

NURSING HOME LITIGATION
CASE MANAGEMENT ORDER NO. 2

AND NOW, this 3/24 day of August, 2009, it is hereby

ORDERED:

1. Simplified discovery motions shall be filed electronically with the Court. Simplified discovery motions shall be simultaneously submitted via e-mail, in Word format, to the Discovery Master at gkramer@gildakramer.com with a copy to rjohnston@gildakramer.com. Attachments may be in pdf format.

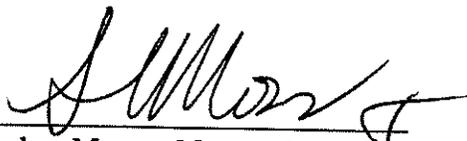
2. The simplified discovery motion shall contain the following information:

- a. Caption
- b. Name of motion
- c. Parties
- d. Service list with each counsel's name, address, telephone number, fax number, and e-mail address.
- e. Name of nursing home
- f. Dates:
 - i. Complaint filed
 - ii. Discovery deadline
 - iii. Residency dates
 - iv. Specific injury dates
- g. Summary of injuries claimed by plaintiff

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- h. Succinct statement of discovery issues
 - i. Statement of personal contacts of counsel to resolve dispute.
3. Counsel shall attach to the simplified discovery motion copies of the specific disputed discovery requests and responses, but shall not include interrogatories, document requests, or other discovery that is not in dispute.
4. Counsel shall attach to the simplified discovery motion a proposed order.
5. Within ten days, or as soon thereafter as practical after receipt of a simplified discovery motion, the Discovery Master shall, if needed, hold a telephone discovery conference.
6. The responding party may, but is not required to, submit an e-mail or letter response to the motion before the telephone discovery conference.
7. Counsel shall not send copies of their correspondence to one another about discovery issues to the Discovery Master.
8. All documents produced in discovery after the date of this order shall be Bates-stamped.

BY THE COURT:


Sandra Mazer Moss, J.