

**THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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|--|---|------------------------------|
| <b>IN RE: SOCLEAN, INC.</b>                    | ) |                              |
| <b>MARKETING, SALES PRACTICES</b>              | ) | Master Docket: No. 22-mc-152 |
| <b>AND PRODUCTS LIABILITY</b>                  | ) |                              |
| <b>LITIGATION</b>                              | ) | MDL No. 3021                 |
|  | ) |                              |
| This document relates to: <i>SoClean, Inc.</i> | ) |                              |
| <i>v. Koninklijke Philips N.V. et al.</i> ,    | ) |                              |
| 2:22-cv-00542                                  | ) |                              |

**PRETRIAL ORDER #12**  
**COORDINATED PARTIAL DISCOVERY PLAN**

The following coordinated partial discovery plan, which has been approved for this matter by the Discovery Special Master, is entered in the above-captioned MDL:

1. Protective Order. By June 29, 2022, the parties will submit a proposed protective order concerning confidential information, together with any remaining disputes regarding provisions of the same, to the Special Master.
2. ESI Order. By June 29, 2022, the parties will submit a proposed order regarding the discovery of documents and electronically stored information (“ESI”), together with any remaining disputes regarding provisions of the same, to the Special Master.
3. Privilege Log Protocol. By June 29, 2022, the parties will submit a proposed order governing a privilege log protocol, together with any remaining disputes regarding provisions of the same, to the Special Master.
4. Initial Identification of Custodians, Search Terms and Non-Custodial Sources of Data. On or by June 29, 2022, the parties shall identify their initial list of custodial and non-custodial sources reasonably believed to contain potentially relevant information. By July 22, 2022, the parties shall identify their initial list of search terms. The parties’ identifications shall be consistent with the W.D. Pa. ESI checklist concerning scope of custodial and non-custodial productions, protocols and processes. The parties’ identification of an initial list of custodians is without prejudice to any party later identifying further custodians after review of the pleadings or after receiving discovery requests from another party. The identification of custodial and non-custodial sources shall be supplemented, if necessary, in accordance with Fed. R. Civ. P. 26(e). The parties shall meet and confer concerning reasonable requests for additional information on custodial and non-custodial sources, as well as any assertion by a party that the search of any particular source would be unduly burdensome, cumulative, overbroad, and/or disproportional. The selection of custodial and

non-custodial sources for production shall be governed by the order regarding the discovery of documents and electronically stored information discussed in Paragraph 2 above, and such other orders as may be entered by the Court hereafter, or agreement of the parties.

5. Deposition Protocol. By August 15, 2022, the parties will submit a proposed order governing depositions, together with any remaining disputes regarding provisions of the same, to the Special Master. In the event that one of the parties seeks to take a deposition prior to that date, the parties will work cooperatively to agree to a process and limits for that deposition or to complete the deposition protocol in advance of such deposition, and bring any disagreements to the Special Master as early as possible.
6. Commencement of Fact Discovery. On August 12, 2022, fact discovery commences pursuant to this discovery plan and any other relevant Court Orders. Subpoenas pursuant to Fed. R. Civ. P. 45 may be served on or after August 12, 2022.
7. Initial Disclosures. The parties have agreed they will make their initial disclosures by August 12, 2022.
8. Deadlines and Limitations on Written Discovery. By September 9, 2022, the parties will submit a proposed order governing deadlines and limits for serving and responding to requests for production, interrogatories, and admissions, together with any remaining disputes regarding provisions of the same, to the Special Master.
9. By November 30, 2022, the parties shall meet and confer regarding a supplemental discovery plan and proposed case management order, including, as appropriate, deadlines for substantial completion of document production and completion of fact discovery, expert disclosure and discovery schedules, *Daubert* briefing schedules, summary judgment, and trial.
10. The parties will continue to participate in regularly scheduled conference calls, videoconferences, and/or meetings with the Special Master to address discovery issues. These regular calls/meetings will be continue as needed and at the discretion and direction of the Special Master.

**IT IS SO ORDERED.**

DATED: June 23, 2022

s/Joy Flowers Conti

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The Honorable Joy Flowers Conti,  
Senior United States District Judge