

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

**IN RE: SOCLEAN, INC., MARKETING,
SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

This Document Relates to: *All Consumer Cases*

Master Docket: Misc. No. 22-mc-152

MDL No. 3021

PRETRIAL ORDER #26

REGARDING DEADLINES AND LIMITS OF WRITTEN DISCOVERY

Per Pretrial Order #14 [Doc. 118], the Parties set forth the following limits with regard to written discovery.

1. **Requests for Production.** Consumer Plaintiffs have propounded two sets of Requests for Production (RFPs) on Defendant SoClean, Inc. The requests made thus far total sixty-nine. SoClean has provided some responsive documents to the first set of RFPs and the Parties continue to work cooperatively to identify deficiencies and facilitate the exchange of requests and documents.

a) Both Consumer Plaintiffs and Defendant SoClean will each be allowed to make **250** total Requests for Production.

b) By **May 1, 2023**, document productions will be substantially complete.

2. **Interrogatories.**

a) Both Consumer Plaintiffs and Defendant SoClean will each be allowed **50** total interrogatories, including all discrete subparts, directed at each Party. Each individual consumer Plaintiff is considered a separate Party for purposes of this Stipulation.

b) Interrogatories will be answered within thirty (30) days of receipt of the requests, per Fed. R. Civ. P. 33(b)(2).

3. **Requests for Admission.**

a) Both Consumer Plaintiffs and Defendant SoClean will each be allowed **150** total Requests for Admission under Fed. R. Civ. P. 36(a)(1)(A).

b) Consumer Plaintiffs and Defendant SoClean will not be limited in the number of Requests for Admission under Fed. R. Civ. P. 36(a)(1)(B).

c) Each request shall seek a discrete, singular admission and shall not be compound or include subparts.

d) Federal Civil Rule of Procedure 36(a)(3) will govern the time to respond and the effect of not responding.

4. This Addendum does not waive the Parties' rights to stipulate to or request revision of these limits if additional discovery is required.

IT IS SO ORDERED.

Dated: 9/21/2022

/s/ JOY FLOWERS CONTI

Joy Flowers Conti
Senior United States District Judge

SO STIPULATED AND AGREED.

DATED: September 16, 2022

SHARP LAW, LLP

/s/ Ruth Anne French-Hodson

Ruth Anne French-Hodson, KS #28492
Sarah T. Bradshaw, KS #26651
Sharp Law, LLP
4820 W. 75th St.
Prairie Village, KS 66208
Telephone: (913) 901-0505
Facsimile: (913) 901-0419
rafrenchhodson@midwest-law.com
sbradshaw@midwest-law.com

and

MASON, LLP

Gary E. Mason
Danielle L. Perry
5101 Wisconsin Ave., Suite 305
Washington, DC 20016
Tel: 202.429.2290
Fax: 202.429.2294
gmason@masonllp.com
dperry@masonllp.com

Co-lead Counsel for Consumer Plaintiffs

PROSKAUER ROSE LLP

/s/ Colin G. Cabral

Colin G. Cabral (BBO # 670234)
Michael R. Hackett (BBO # 676693)
James A. Anderson (BBO # 693781)
Hena M. Vora (BBO # 704029)
One International Place
Boston, MA 02110
p: 617-526-9600
f: 617-526-9899
ccabral@proskauer.com
mhackett@proskauer.com
jaanderson@proskauer.com
hvora@proskauer.com

Jeffrey H. Warshafsky
Eleven Times Square
New York, NY 10036
p: 212-969-3000
f: 212-969-2900
jwarshafsky@proskauer.com

**MARKS, O'NEILL, O'BRIEN, DOHERTY
& KELLY, P.C.**

Daniel R. Bentz (PA #200772)
Suite 2600 Gulf Tower 707 Grant Street
Pittsburgh, PA 15219
Office: 412-391-6171
Direct: 412-467-2021
Fax: 412-391-8804
dbentz@moodklaw.com

Counsel for SoClean, Inc