



19TH JUDICIAL DISTRICT COURT
PARISH OF EAST BATON ROUGE
STATE OF LOUISIANA
300 NORTH BLVD
BATON ROUGE, LA 70801

30TH DAY OF SEPTEMBER, 2021

TO: J. E. CULLENS JR.
WALTERS, PAPILLION, THOMAS, CULLENS, LLC
12345 PERKINS ROAD, BUILDING ONE
BATON ROUGE, LA 70810

JAMES J DONELON, COMMISSIONER OF INSURANCE FOR THE STATE OF
LOUISIANA VS TERRY S SHILLING, ET AL

CASE NUMBER: C-651069

JUDGE: HON. TIMOTHY E KELLEY

DIVISION: 22

YOU ARE HEREBY NOTIFIED OF THE FOLLOWING ACTION FOR THE

AFOREMENTIONED CASE: ATTACHED YOU WILL FIND A COPY OF A CASE
MANAGEMENT SCHEDULE SIGNED ON SEPTEMBER 30, 2021 BY JUDGE TIMOTHY
KELLEY.

DEPUTY CLERK FOR DOUG WELBORN

NOTIFIED:

A SIMONE MANUEL
A'DAIR FLYNT
ADAM D WHITWORTH
ALEXANDER N BRECKINRIDGE V
ANDREE MATHERNE CULLENS
C AUSTIN HOLLIDAY
CATHARINE LUO
DAVID R GODOFSKY
FREDERIC THEODORE LE CLERCQ
GEORGE DAVIDSON FAGAN
HARRY ALLAN ROSENBERG
HENRY D H OLINDE JR
J. E. CULLENS JR.
JAMES ALCEE BROWN
JENA W SMITH
JENNIFER W MOROUX
JOHN ASHLEY MOORE
JOHN WILLIAM HITE III
JUSTIN J MAROCCO
JUSTIN KATTAN
JUSTINE N. MARGOLIS
KARL H SCHMID
MATTHEW JOSEPH FARLEY

MICHAEL A BALASCIO
MIRAIS M HOLDEN
MONICA M. VELA-VICK
REID ASHINOFF
RICHARD E BAUDOUIN
ROBERT B BIECK JR
ROBERT J DAVID JR
ROBERT W BARTON
RYAN K FRENCH
SETH A SCHMEECKLE
THOMAS M MCEACHIN
W BRETT MASON

JAMES J. DONELON, COMMISSIONER
OF INSURANCE FOR THE STATE OF
LOUISIANA, IN HIS CAPACITY AS
REHABILITATOR OF LOUISIANA
HEALTH COOPERATIVE, INC.

versus

MILLIMAN, INC.

SUIT NO.: 651,069 SECTION: 22

19TH JUDICIAL DISTRICT COURT

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

SUPERSEDING CASE MANAGEMENT SCHEDULE

BY ORDER OF THIS COURT, the following Case Management Schedule shall control this case. No variance of this Order shall be allowed without written approval of this Court:

- Parties shall work together to exchange, search, and manage all ESI data. To the extent they have not already done so, the parties shall serve written responses and objections to any outstanding written discovery requests on or before September 30, 2020, and substantially complete production of responsive, non-privileged documents to such requests on or before March 1, 2021.
- Parties shall reciprocally exchange preliminary witness lists on or before March 15, 2021.
- Joinder of parties and amendment of pleadings must be completed on or before April 1, 2021.
- Parties shall supplement their fact witness list on or before May 14, 2021.
- Final fact discovery cutoff is set for April 1, 2022. All discovery motions and motions for protective orders pertaining to fact discovery must be filed no later than 30 days after this date.
- The parties have agreed to set aside the following dates for depositions:

October 2021: 26, 27, 28	January 2022: 18, 19, 20, 27, 28
November 2021: 2, 3, 16, 17, 18	February 2022: 10, 11, 17, 18
December 2021: 7, 8, 9, 14, 15	March 2022: 10, 11, 14, 15, 16, 24, 25, 28, 29, 30, 31

Absent prior consent and agreement of all parties, depositions shall not be scheduled on any date not listed herein.

The parties have agreed to take depositions either in-person and/or via Zoom, depending upon the circumstances surrounding the subject deposition, and pursuant to a mutually agreeable protocol.

- Expert witness testimony is required:
 - Plaintiff shall disclose to defendant(s) the names of all testifying experts and the subject matter of their testimony on or before March 15, 2022. All Plaintiff's expert reports shall be produced to defendant(s) on or before April 15, 2022.
 - Defendant shall disclose to plaintiff the names of all testifying experts and the subject matter of their testimony on or before May 16, 2022. All Defendant(s) expert reports shall be produced to plaintiff on or before June 15, 2022.
- All expert discovery, including depositions of all experts, shall be completed on or before August 15, 2022. All discovery motions and motions for protective orders pertaining to expert discovery shall be filed no later than 30 days after this date.

9. Parties shall exchange pretrial inserts on or before September 16, 2022.

10. Parties shall file all pre-trial motions (with the exception of non-Daubert, evidentiary, motions in limine), including any dispositive motion or exception, any Daubert motion or other motion challenging the admissibility of any expert testimony (in whole or in part), and/or any discovery motion, on or before October 3, 2022.

11. The pretrial order shall be prepared, signed by all parties, and filed by plaintiff counsel with the court on October 31, 2022.

12. It is the intent and desire of the parties, subject to the discretion and Order of this Court, that the trial of this matter shall be set in the spring of 2023 or summer of 2023.

The foregoing Case Management Schedule is adopted as an Order of this Court this September 30 2021
day of September, 2021.



Judge Timothy E. Kelley

RULE 9.5(b) CERTIFICATE

I certify that I first circulated this proposed superseding CASE MANAGEMENT SCHEDULE to counsel for all parties by email on July 29, 2021, and that after numerous edits and revisions suggested by all counsel were made, all counsel agreed to the form of this proposed CASE MANAGEMENT SCHEDULE prior to filing this date.

Certified this 29th day of SEPTEMBER, 2021.



J. E. Cullens, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been furnished via e-mail to all counsel of record as follows, this 29th day of SEPTEMBER, 2021, in Baton Rouge, Louisiana.

Harry Rosenberg
Phelps Dunbar
365 Canal Street
Suite 2000
New Orleans, LA 70130

Reid L. Ashinoff
Justin N. Kattan
Justine N. Margolis
Catharine Luo
Dentons US, LLP
1221 Avenue of the Americas
New York, NY 10020



J. E. Cullens, Jr.

**COPY SENT TO ALL
COR ON OCTOBER 1, 2021.**