

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
Southern Division**

IN RE SILICONE GEL BREAST)	CASE NO. CV 92-P-10000-S
IMPLANTS PRODUCTS LIABILITY)	
LITIGATION (MDL-926))	(This document applies to all cases)
)	

ORDER No. 30E
(Amendment to Appendix B of Order No. 30)

Appendix B to Order 30 is hereby amended by adding to paragraph 4(b) (relating to trial perpetuation depositions of retained experts) the following subparagraphs:

(1) Trial perpetuation depositions of plaintiffs' nationally-retained experts who will be presenting "generic" opinions should be conducted in accordance with the following guidelines (subject to modification by agreement of the parties or through application to this court or to any judicial officer or master presiding over the deposition):

•Direct examination should be conducted by not more than two attorneys selected by the PSC, and should be completed in three hours

•Cross examination should be conducted by not more than three attorneys selected by the defendants, and should be completed in six hours

•Any redirect examination should be conducted by one attorney selected by the PSC, and should be completed in one hour

•Any re-cross examination should be conducted by one attorney selected by the defendants, and should be completed in half the time of any redirect examination

(2) The parties are directed to submit to the court by September 30, 1996, suggestions for appropriate guidelines for trial perpetuation depositions of defendants' nationally-retained experts who will be presenting "generic" opinions.

(3) For all trial perpetuation depositions of nationally-retained experts who will present "generic" opinions, the parties should attempt to reach agreement on a "courtroom setting" in which to conduct the depositions and on designation of a special master to preside at the depositions and rule on such objections as leading questions, non-responsive answers, and claims of privilege. The cost of any such special master will be borne equally by the plaintiffs and the defendants.

This the 20th day of August, 1996.

/s/ Sam C. Pointer, Jr.
United States District Judge