

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**KURIAN DAVID, et al.
Plaintiffs**

CIVIL ACTION

VERSUS

No. 08-1220

**SIGNAL INTERNATIONAL, LLC, et al.,
Defendants**

SECTION "E"

**EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,
Plaintiff**

CIVIL ACTION

VERSUS

No. 12-557

**SIGNAL INTERNATIONAL, LLC, et al.,
Defendants**

SECTION "E"

**LAKSHMANAN PONNAYAN ACHARI, et al.,
Plaintiffs**

CIVIL ACTION

VERSUS

**No. 13-6218
(c/w 13-6219, 13-6220,
13-6221, 14-732, 14-
1818)**

**SIGNAL INTERNATIONAL, LLC, et al.,
Defendants**

SECTION "E"

**Applies To:
Achari v. Signal
(No. 13-6218 c/w 13-6219, 13-6220, 13-6221, 14-732, 14-1818)**

ORDER

At Signal's request, the Court will extend the deadline for Signal to conduct plaintiff depositions in the *Chakkiyattil, Krishnakutty, Singh, and Devassy* Cases (the "Plaintiff Depositions"). At Plaintiffs' request, the Court will extend the deadline in the *Chakkiyattil, Krishnakutty, Singh, and Devassy* Cases for Plaintiffs to depose either Chris Cunningham or Dwight Noble, and Patricia Bollman (subject to objection), John Sanders, Malon Scogin, Rodney Meisetschlaeger, Tom Rigolo, Ravinder Reddy, and Lewis Harkey (the "Signal Depositions"). The Signal Depositions must be conducted before the case-specific deadlines set forth below or they may not be utilized in that particular case. In any event, deponents in the Signal Depositions may not be deposed more than once with respect to the *Chakkiyattil, Krishnakutty, Singh, and Devassy* Cases.

The parties shall adhere to the following deadlines:

<u>All Consolidated Cases</u>	
Status conference	December 17, 2014 at 3:00 p.m
Status conference	February 11, 2015 at 3:00 p.m.
Status conference (via telephone)	April 1, 2015 at 2:00 p.m.
Status conference	September 9, 2015 at 1:00 p.m.
Status conference	November 9, 2015 at 1:00 p.m.

<u>All Consolidated Cases</u> (except 14-1818)	
Exchange of fact witness and exhibit lists	Filed and served by September 19, 2014

Exchange of expert witness list	Filed and served by September 30, 2014
Status Conference	October 30, 2014 at 2:00 p.m.
End of fact discovery, including fact depositions for use at trial, (except as set forth herein)	Completed by November 28, 2014
Depositions of Jomon George and Shajji Veluthalakuzhiyil Nanoo	December 10, 2014
Plaintiffs' expert reports (except experts on attorneys' fees)	Delivered to defense counsel by December 31, 2014
Defendants' expert reports, including rebuttal expert reports (except experts on attorneys' fees)	Delivered to Plaintiffs' counsel by January 30, 2015
Plaintiffs' rebuttal expert reports (except experts on attorneys' fees)	Delivered to defense counsel by February 13, 2015
Expert depositions, including depositions for use at trial	Completed by March 13, 2015
Non-evidentiary pretrial motions and motions <i>in limine</i> regarding the admissibility of expert testimony	Filed and served no later than April 1, 2015
Responses/oppositions to non-evidentiary pretrial motions and motions <i>in limine</i> regarding the admissibility of expert testimony	Filed and served no later than April 16, 2015
Replies to oppositions to non-evidentiary pretrial motions and motions <i>in limine</i> regarding the admissibility of expert testimony	Filed and served no later than April 30, 2015
<u>Achari case</u>	
Deadline to submit list of proposed plaintiffs for second jury trial	January 31, 2015
Dispositive motions	Filed and served no later than April 16,

	2015
Oppositions to dispositive motions	Filed and served no later than April 30, 2015
Replies to oppositions to dispositive motions	Filed and served no later than May 15, 2015
Final witness and exhibit lists	Filed and served no later than May 18, 2015
Pretrial order	Filed by June 10, 2015 at 5:00 p.m.
Joint statement of the case	Filed by June 10, 2015 at 5:00 p.m. See pretrial notice at p. 7.
Joint jury instructions	Filed and emailed to the Court by June 10, 2015 at 5:00 p.m. See pretrial notice at pp. 7-8.
Joint proposed jury verdict form (or if agreement cannot be reached, separate proposed jury verdict forms and a joint memorandum explaining the disagreements between the parties as to the verdict form).	Filed by June 10, 2015 at 5:00 p.m. See pretrial notice at p. 8.
Proposed special voir dire questions	Filed by June 10, 2015 at 5:00 p.m. See pretrial notice at p. 8.
Pretrial conference	June 15, 2015 at 2:00 p.m.
Motions <i>in limine</i> (other than those regarding the admissibility of expert testimony) and memoranda in support	Filed and served no later than June 15, 2015 at 5:00 p.m.
Responses to non-expert motions <i>in limine</i> and memoranda in support	Filed and served no later than June 22, 2015 at 5:00 p.m.
Deadline to exchange deposition excerpts intended to be introduced in lieu of live testimony	Filed and served no later than June 22, 2015 at 5:00 p.m.

<p>Objections to exhibits and supporting memoranda</p> <p>Note: Each objection must identify the relevant objected-to exhibit by the number assigned to the exhibit in the joint bench book(s). See pretrial notice at p. 5.</p>	<p>Filed by June 26, 2015 at 5:00 p.m. See pretrial notice at p. 5.</p>
<p>Two copies of joint bench book(s) of tabbed exhibits, with indices of “objected-to” and “unobjected-to” exhibits, identifying which party will offer each exhibit and which witness will testify regarding the exhibit at trial</p>	<p>Delivered to the Court by June 26, 2015 at 5:00 p.m. See pretrial notice at p. 5.</p>
<p>Objections to deposition testimony and supporting memoranda</p> <p>(Counsel first shall confer to attempt to resolve any such objections, see p. 6 of the pretrial notice.)</p>	<p>Filed by June 26, 2015 at 5:00 p.m. See pretrial notice at p. 6.</p>
<p>Responses to objections to exhibits and supporting memoranda</p>	<p>Filed by June 31, 2015 at 5:00 p.m. See pretrial notice at p. 5.</p>
<p>Responses to objections to deposition testimony and supporting memoranda</p>	<p>Filed by June 31, 2015 at 5:00 p.m. See pretrial notice at p. 6.</p>
<p>If counsel intends to ask questions on cross-examination of an economic expert which require mathematical calculations</p>	<p>The factual elements of such questions shall be submitted to the expert witness by June 31, 2015 at 5:00 p.m. See pretrial notice at p. 7.</p>
<p>List and brief description of any charts, graphs, models, schematic diagrams, and similar objects intended to be used in opening statements or closing arguments</p>	<p>Provided to opposing counsel by June 31, 2015 at 5:00 p.m. See pretrial notice at pp. 6-7.</p>

Objections to any charts, graphs, models, schematic diagrams, and similar objects intended to be used by opposing counsel in opening statements or closing <i>arguments</i>	Filed by July 1, 2015 at 5:00 p.m. See pretrial notice at pp. 6-7.
Jury trial for <u>10 plaintiffs</u>	July 6, 2015 , at 9:00 a.m. (estimated to last 1 month)
Second jury trial	October 31, 2016 , at 9:00 a.m. (estimated to last 1 month)
<i>Chakkiyattil case</i>	
Deadline to submit list of proposed plaintiffs for second jury trial	March 31, 2015
Deadline for Plaintiff Depositions and Signal Depositions	August 1, 2015
Dispositive motions	Filed and served no later than October 19, 2015
Oppositions to dispositive motions	Filed and served no later than October 26, 2015
Replies to oppositions to dispositive motions	Filed and served no later than November 2, 2015
Final witness and exhibit lists (may include deponents in Signal Depositions but <i>only</i> if deposed by deadline above)	Filed and served no later than November 23, 2015
Pretrial order	Filed by December 9, 2015 at 5:00 p.m.
Joint statement of the case	Filed by December 9, 2015 at 5:00 p.m. See pretrial notice at p. 7.
Joint jury instructions	Filed and emailed to the Court by December 9, 2015 at 5:00 p.m. See pretrial notice at pp. 7-8.

Joint proposed jury verdict form (or if agreement cannot be reached, separate proposed jury verdict forms and a joint memorandum explaining the disagreements between the parties as to the verdict form).	Filed by December 9, 2015 at 5:00 p.m. See pretrial notice at p. 8.
Proposed special voir dire questions	Filed by December 9, 2015 at 5:00 p.m. See pretrial notice at p. 8.
Pretrial conference	December 14, 2015 at 2:00 p.m.
Motions <i>in limine</i> (other than those regarding the admissibility of expert testimony) and memoranda in support	Filed and served no later than December 14, 2015 at 5:00 p.m.
Deadline to exchange deposition excerpts intended to be introduced in lieu of live testimony	Filed and served no later than December 21, 2015 at 5:00 p.m.
Responses to non-expert motions <i>in limine</i> and memoranda in support	Filed and served no later than December 21, 2015 at 5:00 p.m.
Objections to exhibits and supporting memoranda Note: Each objection must identify the relevant objected-to exhibit by the number assigned to the exhibit in the joint bench book(s). See pretrial notice at p. 5.	Filed by December 28, 2015 at 5:00 p.m. See pretrial notice at p. 5.
Two copies of joint bench book(s) of tabbed exhibits, with indices of “objected-to” and “unobjected-to” exhibits, identifying which party will offer each exhibit and which witness will testify regarding the exhibit at trial	Delivered to the Court by December 28, 2015 at 5:00 p.m. See pretrial notice at p. 5.
Objections to deposition	Filed by December 28, 2015 at

testimony and supporting memoranda (Counsel first shall confer to attempt to resolve any such objections, see p. 6 of the pretrial notice.)	5:00 p.m. See pretrial notice at p. 6.
Responses to objections to exhibits and supporting memoranda	Filed by December 30, 2015 at 5:00 p.m. See pretrial notice at p. 5.
Responses to objections to deposition testimony and supporting memoranda	Filed by December 30, 2015 at 5:00 p.m. See pretrial notice at p. 6.
If counsel intends to ask questions on cross-examination of an economic expert which require mathematical calculations	The factual elements of such questions shall be submitted to the expert witness by December 30, 2015 at 5:00 p.m. See pretrial notice at p. 7.
List and brief description of any charts, graphs, models, schematic diagrams, and similar objects intended to be used in opening statements or closing arguments	Provided to opposing counsel by December 30, 2015 at 5:00 p.m. See pretrial notice at pp. 6-7.
Objections to any charts, graphs, models, schematic diagrams, and similar objects intended to be used by opposing counsel in opening statements or closing arguments	Filed by December 31, 2015 at 5:00 p.m. See pretrial notice at pp. 6-7.
Jury trial for <u>10 plaintiffs</u>	January 4, 2016 , at 9:00 a.m. (estimated to last 1 month)
Second jury trial	January 9, 2017 at 9:00 a.m. (estimated to last 1 month)
<i>Krishnakutty case and Singh case</i>	
Deadline for Plaintiff Depositions and Signal Depositions	September 1, 2015

Dispositive motions	Filed and served no later than December 7, 2015
Oppositions to dispositive motions	Filed and served no later than December 14, 2015
Replies to oppositions to dispositive motions	Filed and served no later than December 21, 2015
Final witness and exhibit lists (may include deponents in Signal Depositions but <i>only</i> if deposed by deadline above)	Filed and served no later than January 18, 2016
Pretrial order	Filed by February 3, 2016 at 5:00 p.m.
Joint statement of the case	Filed by February 3, 2016 at 5:00 p.m. See pretrial notice at p. 7.
Joint jury instructions	Filed and emailed to the Court by February 3, 2016 at 5:00 p.m. See pretrial notice at pp. 7-8.
Joint proposed jury verdict form (or if agreement cannot be reached, separate proposed jury verdict forms and a joint memorandum explaining the disagreements between the parties as to the verdict form).	Filed by February 3, 2016 at 5:00 p.m. See pretrial notice at p. 8.
Proposed special voir dire questions	Filed by February 3, 2016 at 5:00 p.m. See pretrial notice at p. 8.
Pretrial conference	February 8, 2016 at 2:00 p.m.
Motions <i>in limine</i> (other than those regarding the admissibility of expert testimony) and memoranda in support	Filed and served no later than February 8, 2016 at 5:00 p.m.
Deadline to exchange deposition excerpts intended to be introduced in lieu of live testimony	Filed and served no later than February 15, 2016 at 5:00 p.m.
Responses to non-expert motions	Filed and served no later than February

<i>in limine</i> and memoranda in support	15, 2016 at 5:00 p.m.
Objections to exhibits and supporting memoranda Note: Each objection must identify the relevant objected-to exhibit by the number assigned to the exhibit in the joint bench book(s). See pretrial notice at p. 5.	Filed by February 22, 2016 at 5:00 p.m. See pretrial notice at p. 5.
Two copies of joint bench book(s) of tabbed exhibits, with indices of “objected-to” and “unobjected-to” exhibits, identifying which party will offer each exhibit and which witness will testify regarding the exhibit at trial	Delivered to the Court by February 22, 2016 at 5:00 p.m. See pretrial notice at p. 5.
Objections to deposition testimony and supporting memoranda (Counsel first shall confer to attempt to resolve any such objections, see p. 6 of the pretrial notice.)	Filed by February 22, 2016 at 5:00 p.m. See pretrial notice at p. 6.
Responses to objections to exhibits and supporting memoranda	Filed by February 24, 2016 at 5:00 p.m. See pretrial notice at p. 5.
Responses to objections to deposition testimony and supporting memoranda	Filed by February 24, 2016 at 5:00 p.m. See pretrial notice at p. 6.
If counsel intends to ask questions on cross-examination of an economic expert which require mathematical calculations	The factual elements of such questions shall be submitted to the expert witness by February 24, 2016 at 5:00 p.m. See pretrial notice at p. 7.
List and brief description of any charts, graphs, models, schematic diagrams, and similar objects	Provided to opposing counsel by February 24, 2016 at 5:00 p.m. See pretrial notice

intended to be used in opening statements or closing arguments	at pp. 6-7.
Objections to any charts, graphs, models, schematic diagrams, and similar objects intended to be used by opposing counsel in opening statements or closing <i>arguments</i>	Filed by February 25, 2016 at 5:00 p.m. See pretrial notice at pp. 6-7.
Jury trial	February 29, 2016 , at 9:00 a.m. (estimated to last 1 month)
<u>Devassy case</u>	
Deadline for Plaintiff Depositions and Signal Depositions	November 1, 2015
Dispositive motions	Filed and served no later than February 22, 2016
Oppositions to dispositive motions	Filed and served no later than February 29, 2016
Replies to oppositions to dispositive motions	Filed and served no later than March 7, 2016
Final witness and exhibit lists (may include deponents in Signal Depositions but <i>only</i> if deposed by deadline above)	Filed and served no later than March 21, 2016
Pretrial order	Filed by April 6, 2016 at 5:00 p.m.
Joint statement of the case	Filed by April 6, 2016 at 5:00 p.m. See pretrial notice at p. 7.
Joint jury instructions	Filed and emailed to the Court by April 6, 2016 at 5:00 p.m. See pretrial notice at pp. 7-8.

Joint proposed jury verdict form (or if agreement cannot be reached, separate proposed jury verdict forms and a joint memorandum explaining the disagreements between the parties as to the verdict form).	Filed by April 6, 2016 at 5:00 p.m. See pretrial notice at p. 8.
Proposed special voir dire questions	Filed by April 6, 2016 at 5:00 p.m. See pretrial notice at p. 8.
Pretrial conference	April 11, 2016 at 2:00 p.m.
Motions <i>in limine</i> (other than those regarding the admissibility of expert testimony) and memoranda in support	Filed and served no later than April 11, 2016 at 5:00 p.m.
Deadline to exchange deposition excerpts intended to be introduced in lieu of live testimony	Filed and served no later than April 18, 2016 at 5:00 p.m.
Responses to non-expert motions <i>in limine</i> and memoranda in support	Filed and served no later than April 18, 2016 at 5:00 p.m.
Objections to exhibits and supporting memoranda Note: Each objection must identify the relevant objected-to exhibit by the number assigned to the exhibit in the joint bench book(s). See pretrial notice at p. 5.	Filed by April 25, 2016 at 5:00 p.m. See pretrial notice at p. 5.
Two copies of joint bench book(s) of tabbed exhibits, with indices of “objected-to” and “unobjected-to” exhibits, identifying which party will offer each exhibit and which witness will testify regarding the exhibit at trial	Delivered to the Court by April 25, 2016 at 5:00 p.m. See pretrial notice at p. 5.
Objections to deposition	Filed by April 25, 2016 at 5:00 p.m. See

testimony and supporting memoranda (Counsel first shall confer to attempt to resolve any such objections, <i>see</i> p. 6 of the pretrial notice.)	pretrial notice at p. 6.
Responses to objections to exhibits and supporting memoranda	Filed by April 27, 2016 at 5:00 p.m. <i>See</i> pretrial notice at p. 5.
Responses to objections to deposition testimony and supporting memoranda	Filed by April 27, 2016 at 5:00 p.m. <i>See</i> pretrial notice at p. 6.
If counsel intends to ask questions on cross-examination of an economic expert which require mathematical calculations	The factual elements of such questions shall be submitted to the expert witness by April 27, 2016 at 5:00 p.m. <i>See</i> pretrial notice at p. 7.
List and brief description of any charts, graphs, models, schematic diagrams, and similar objects intended to be used in opening statements or closing arguments	Provided to opposing counsel by April 27, 2016 at 5:00 p.m. <i>See</i> pretrial notice at pp. 6-7.
Objections to any charts, graphs, models, schematic diagrams, and similar objects intended to be used by opposing counsel in opening statements or closing <i>arguments</i>	Filed by April 28, 2016 at 5:00 p.m. <i>See</i> pretrial notice at pp. 6-7.
Jury trial	May 2, 2016 , at 9:00 a.m. (estimated to last two weeks)

<i>Thomas case</i>	
Deadline to submit list of proposed plaintiffs for first jury trial	December 31, 2014

Exchange of expert witness lists	Filed and served by November 16, 2015
Depositions of Signal employees	Completed by December 18, 2015
End of fact discovery, including fact depositions for use at trial	Completed by January 7, 2016
Exchange of exhibit lists	Filed and served by February 15, 2016
Plaintiffs' expert reports (except experts on attorneys' fees)	Delivered to defense counsel by March 14, 2016
Defendants' expert reports (except experts on attorneys' fees)	Delivered to plaintiffs' counsel by March 28, 2016
Plaintiffs' rebuttal expert reports (except experts on attorneys' fees)	Delivered to defense counsel by April 6, 2016
Expert depositions, including depositions for use at trial	Completed by May 6, 2016
Non-evidentiary pretrial motions and motions <i>in limine</i> regarding the admissibility of expert testimony	Filed and served no later than May 13, 2016
Dispositive motions	Filed and served no later than May 20, 2016
Responses/oppositions to non-evidentiary pretrial motions and motions <i>in limine</i> regarding the admissibility of expert testimony	Filed and served no later than May 27, 2016
Replies to oppositions to non-evidentiary pretrial motions and motions <i>in limine</i> regarding the admissibility of expert testimony	Filed and served no later than June 1, 2016
Oppositions to dispositive motions	Filed and served no later than June 3, 2016
Replies to oppositions to dispositive motions	Filed and served no later than June 8, 2016
Final witness and exhibit lists	Filed and served no later than June 8, 2016

Pretrial order	Filed by June 13, 2016 at 5:00 p.m.
Joint statement of the case	Filed by June 13, 2016 at 5:00 p.m. See pretrial notice at p. 7.
Joint jury instructions	Filed and emailed to the Court by June 13, 2016 at 5:00 p.m. See pretrial notice at pp. 7-8.
Joint proposed jury verdict form (or if agreement cannot be reached, separate proposed jury verdict forms and a joint memorandum explaining the disagreements between the parties as to the verdict form).	Filed by June 13, 2016 at 5:00 p.m. See pretrial notice at p. 8.
Proposed special voir dire questions	Filed by June 13, 2016 at 5:00 p.m. See pretrial notice at p. 8.
Pretrial conference	June 16, 2016, at 2:00 p.m
Motions <i>in limine</i> (other than those regarding the admissibility of expert testimony) and memoranda in support	Filed and served no later than June 22, 2016 at 5:00 p.m.
Responses to non-expert motions <i>in limine</i> and memoranda in support	Filed and served no later than June 29, 2016 at 5:00 p.m.
Deadline to exchange deposition excerpts intended to be introduced in lieu of live testimony	June 29, 2016 at 5:00 p.m.
Objections to exhibits and supporting memoranda Note: Each objection must identify the relevant objected-to exhibit by the number assigned to the exhibit in the joint bench book(s). See pretrial notice at p. 5.	Filed by July 1, 2016 at 5:00 p.m. See pretrial notice at p. 5.

Two copies of joint bench book(s) of tabbed exhibits, with indices of "objected-to" and "unobjected-to" exhibits, identifying which party will offer each exhibit and which witness will testify regarding the exhibit at trial	Delivered to the Court by July 1, 2016 at 5:00 p.m. See pretrial notice at p. 5.
Objections to deposition testimony and supporting memoranda (Counsel first shall confer to attempt to resolve any such objections, see p. 6 of the pretrial notice.)	Filed by July 1, 2016 at 5:00 p.m. See pretrial notice at p. 6.
Responses to objections to exhibits and supporting memoranda	Filed by July 6, 2016 at 5:00 p.m. See pretrial notice at p. 5.
Responses to objections to deposition testimony and supporting memoranda	Filed by July 6, 2016 at 5:00 p.m. See pretrial notice at p. 6.
If counsel intends to ask questions on cross-examination of an economic expert which require mathematical calculations	The factual elements of such questions shall be submitted to the expert witness by July 6, 2016 at 5:00 p.m. See pretrial notice at p. 7.
List and brief description of any charts, graphs, models, schematic diagrams, and similar objects intended to be used in opening statements or closing <i>arguments</i>	Provided to opposing counsel by July 6, 2016 at 5:00 p.m. See pretrial notice at pp. 6-7.
Objections to any charts, graphs, models, schematic diagrams, and similar objects intended to be used by opposing counsel in opening statements or closing arguments	Filed by July 7, 2016 at 5:00 p.m. See pretrial notice at pp. 6-7.
First jury trial	July 12, 2016 at 9:00 a.m. (estimated to last 1 month)

New Orleans, Louisiana, this 4th day of March, 2015.



SUSIE MORGAN
UNITED STATES DISTRICT JUDGE