

Clerk's Notice of Decision Document Sent to Parties

on 04/04/2025

STATE OF NEW HAMPSHIRE

SUPERIOR COURT

ROCKINGHAM, ss.
4-3-2024 This motion shall
be scheduled for a hearing.
The schedule needs to also
take account of plaintiff's
represented by other
counsel.

CASE NO. 217-2020-CV-00026
and all consolidated YDC and YDSU CASES
DAVID MEEHAN

v.

Honorable Andrew R. Schulman STATE OF NEW HAMPSHIRE,
April 3, 2025 DEPARTMENT OF HEALTH AND HUMAN SERVICES, et al.



**(IN RE YDC AND YDSU LITIGATION)
(JUDGE SCHULMAN ASSIGNED CASES)**

****This Motion Applies to More than Five Plaintiffs***
This Motion does Not Apply to Contractor Defendants*

**PLAINTIFFS' MOTION FOR ENTRY OF SECOND AMENDMENT TO CASE
STRUCTURING ORDER OF AUGUST 15, 2024**

Pursuant to the Court's direction at the status conference on January 27, 2025, the YDC/YDSU plaintiffs represented by Rilee & Associates, PLLC and Nixon Peabody LLP submit the following proposal to amend the case structuring order setting trial dates and associated deadlines for the cases assigned to Judge Schulman, stating in support as follows:

I. Introduction

1. At the hearing conducted on January 27, 2025, the Court (Schulman, J.) inquired regarding the trial schedule and the parties' agreements with respect to upcoming trial plaintiffs. The Court directed the parties to meet and confer on a proposal for trial plaintiffs to fill out the trial schedule set forth in the Court's August 15, 2024, Case Structuring Order, as amended December 9, 2024 ("August 2024 CSO"). That order provided a schedule for nine trials between March 2025 and October 2026, including a consolidated multi-plaintiff trial starting on September 29, 2025.

2. Important to this task is sorting out the plaintiffs who have or soon will elect to file a claim in the YDC Claims Administration and Settlement Fund (“Settlement Fund”) before it stops accepting new claims after June 30, 2025. Undersigned counsel has been conferring with their clients to determine which plaintiffs would choose to forgo the Settlement Fund in favor of pursuing their claims in court. While this enormous task remains ongoing, we have confirmed more than enough trial plaintiffs to fill out the Court’s trial calendar through 2026.

3. Having identified a sufficient pool of trial plaintiffs, Plaintiffs’ counsel drafted a proposed Second Amendment to Case Structuring Order of August 15, 2024 (“Amended CSO”) that sets forth a trial schedule for plaintiffs who have opted out of the Settlement Fund and attempts, to the greatest extent possible, to arrange their trials in order of seniority, with the earlier filed cases getting priority ahead of later filed cases. Plaintiffs’ proposed Amended CSO also accounts for the goal, shared by both Plaintiffs and the Court, to speed up the process for trials, including by scheduling back-up plaintiffs for each trial date and scheduling several consolidated multi-plaintiff trials.

4. Plaintiffs’ counsel shared their proposed Amended CSO with counsel for the State and the parties thereafter conferred. The State agrees (or at least does not object) to certain aspects of the proposal, but objects to several other aspects, as is discussed in the forthcoming description of the proposal.

II. Explanation of Plaintiffs’ Proposed Trial Plan

5. Plaintiffs’ proposed Amended CSO, attached as Exhibit A, describes the process proposed by Plaintiffs, and the addendum attached thereto sets forth a detailed proposed trial schedule, which identifies the specific plaintiffs proposed.

6. To start with, the proposed Amended CSO incorporates the August 2024 CSO and the December 9, 2024, amendment, utilizing the same trial dates and the same standard case scheduling deadlines (e.g., deadlines for motions, disclosures, discovery, etc.) as set forth on page 19 of the August 2024 CSO.

7. Plaintiffs' proposed trial schedule assigns a pool of 17 plaintiffs to eight trial slots between May 2025 and October 2026. The first five trial periods would all be single plaintiff trials (with a pool of plaintiffs available for each trial period). Consolidated trials of up to three plaintiffs for each trial are reserved for the last three trial periods starting in May 2026. Plaintiffs with similar claims of abuse, during overlapping periods, at the same cottages, and involving some of the same abusers, supervisors, and managers, would present their claims jointly in a single trial.

8. The State has informed Plaintiffs' counsel that they will likely object to the scheduling of multi-plaintiff trials as they did previously in 2023. For the reasons discussed below, *see* Section III, and in the Court's previous orders allowing for consolidated multi-plaintiff trials, Plaintiffs anticipate that the Court will overrule the State's objection and will grant consolidated trials. Plaintiffs also anticipate that the State will likely seek an immediate appeal to the New Hampshire Supreme Court. Because the Supreme Court previously accepted the State's Supreme Court Rule 11 appeal of this Court's prior order allowing the consolidation of cases for trial (which was subsequently dismissed as moot), Plaintiffs assume the Supreme Court will be inclined again to accept the State's renewed appeal of this issue. Plaintiffs therefore preemptively inform the Court that they will agree to a Rule 8 interlocutory appeal of this Court's order granting consolidated trials. Should the Court grant Plaintiffs' request for consolidated trials, Plaintiffs respectfully request that the Court promptly approve the State's interlocutory appeal of that ruling so that it may be finally decided by the Supreme Court without delay.

9. The first trial in the YDC cases was David Meehan’s trial in April 2024. The second trial was to be Michael Gilpatrick’s trial, which was scheduled to commence on March 3, 2025. As the Court knows that case settled at mediation in January 2025, subject to approval by the New Hampshire legislature by no later than July 1, 2025.

10. Trial 3 has already been assigned to Natasha Maunsell and jury selection is scheduled to commence May 5, 2025, with a mediation occurring on March 19, 2025. As there are no back-up plaintiffs for this trial date, the trial will be cancelled if Maunsell’s case settles.

11. Trial 4 is scheduled for jury selection on August 4, 2025. Plaintiffs propose that two plaintiffs be prepared to proceed to trial on that date in the following order of priority: Gilpatrick (if the legislature fails to approve his settlement), or John Doe #1 (if Gilpatrick’s settlement is approved). Under Plaintiffs’ proposal, John Doe #1 will continue to follow the scheduling deadlines set forth on page 19 of the August 2024 CSO, running backwards from a jury selection date of August 4, 2025. Under Plaintiffs’ proposal, mediation in John Doe #1’s case will be completed by the end of March 2025, and the Court will schedule a status conference in June or July 2025. At that status conference, depending on what happens with Gilpatrick’s settlement in the legislature, and with John Doe #1’s mediation, the Court will make a final decision as to which plaintiff will proceed to trial on August 4, or will cancel the trial if both cases are settled. If a plaintiff is designated to proceed on August 4, the Court will schedule a trial management conference (“TMC”), and all the pretrial deadlines that are linked to the TMC (i.e., the deadlines set forth on page 20 of the August 2024 CSO) will attach to that trial.

12. Under Plaintiffs’ proposal, Trial 5, scheduled for jury selection on September 29, 2025, will proceed similarly except that more plaintiffs are added to the pool. Plaintiffs propose the following order of priority for Trial 5: John Doe #1 (if Gilpatrick used the Trial 4 trial period),

or John Doe #2 (if both Gilpatrick and John Doe #1 settled), or John Doe #6 (if John Doe #2 also settled), or Jane Doe #4 (if John Doe #6 also settled). As noted above, John Doe #1's case will have already been prepared under the case scheduling deadlines set for Trial 4. John Doe #2, John Doe #6, and Jane Doe #4 will follow the case scheduling deadlines working backwards from Trial 5's September 29, 2025, jury selection and they will each complete their respective mediations by May 2025. At the status conference in June or July 2025, the Court will make the final designation as to which plaintiff will proceed to trial on this date and will schedule a TMC for that trial. The Court will select the plaintiff with the highest priority who has not settled, if any. If all plaintiffs prepared for Trial 5 have settled, the Court will cancel Trial 5.

13. Under Plaintiffs' proposal, this process repeats again for Trial 6, commencing with jury selection on January 5, 2026, and Trial 7, commencing with jury selection on March 2, 2026. For Trial 6, a new plaintiff is added to the pool—John Doe #30. That plaintiff will prepare for trial under the Trial 6 case scheduling deadlines. All the other plaintiffs will proceed under the prior deadlines noted above. For Trial 7, John Doe #4 will be added to the pool and he will prepare for trial under the Trial 7 case scheduling deadlines. John Doe #30 will complete mediation by August 2025, and John Doe #4 will complete mediation by October 2025. Status conferences will be conducted approximately two or three months before the jury selection dates for each trial, at which time the Court will make a final trial plaintiff designation and schedule the TMC for each trial.

14. The first potential consolidated trial, Trial 8, is not proposed until May 4, 2026. It is hoped that will provide sufficient time for the State's anticipated interlocutory appeal to be decided by the Supreme Court. Case deadlines in all three cases are linked to jury selection on May 4, 2026. All three plaintiffs will have mediations no later than January 2026. At the status

conference in March 2025, the Court will schedule a TMC for a trial with any of the three plaintiffs who have not settled.

15. Two alternatives are proposed for Trial 9. If any of the first 11 plaintiffs listed in this schedule have neither settled their case nor had a trial, the highest priority remaining plaintiff shall be designated for trial on this date. If all the previous cases have been tried and/or otherwise resolved, then the schedule alternatively provides for a second consolidated trial for three designated plaintiffs, following the same procedure as the Trial 8 consolidated trial. A third consolidated trial with another three plaintiffs is set forth for Trial 10. To the extent that the State prevails on its appeal challenging consolidated trials, these consolidated trials will be severed, and the plaintiffs will proceed in order of priority.

16. In general, the trial plaintiffs in Plaintiffs' proposal are scheduled for trial in accordance with the Court's default rule that, absent agreement otherwise, trials are schedule in the order of case filing. The first two exceptions to this default rule are John Doe #4 and John Doe #30, both of whom are prioritized lower than their filing seniority. The reason for their de-prioritization is that both are incarcerated in out-of-state federal prisons. John Doe #4 is incarcerated at FCI Miami (Florida) and has a projected release date of January 22, 2026, and John Doe #30 is incarcerated at FCI Berkley (West Virginia) and has a projected release date of September 3, 2025. Due to the logistical difficulties occasioned by their incarceration, the State has agreed to trial dates for them after their release dates.

17. The other exceptions are the consolidated trials proposed for Trial 8, Trial 9, and Trial 10. In those cases, Plaintiffs' goal was to consolidate plaintiffs with similar claims, based on overlapping time periods, facilities, and abusers. In making selections based on those parameters, it is simply not possible to strictly comply with the Court's seniority default rule.

18. While Plaintiffs’ proposal is intended to be as comprehensive as possible, it cannot foresee all contingencies. It is inevitable that further amendments will be required as the litigation proceeds. For example, if the mediations are successful in resolving cases, it may be necessary to add plaintiffs to the pool of plaintiffs scheduled for trial in 2025 and 2026. At present, additional plaintiffs are available to substitute into the 2025-2026 trial schedule, if necessary. These plaintiffs are further down in the order of priority. The total pool of plaintiffs seeking trial will become even more clear after the Settlement Fund closes on June 30, 2025.

19. On the other hand, if the mediations are unsuccessful and depending on the circumstances of particular plaintiffs, the parties may wish to reshuffle the order of trials. The timing and nature of the Supreme Court’s ruling on consolidated trials could also impact the schedule in ways that necessitate further amendment. Nevertheless, Plaintiffs’ proposal is intended to provide both parties and the Court with some measure of clarity for organizational and preparation purposes.

III. Argument in Support of Consolidated Trials and Multi-Plaintiff Trial Tracks

20. The State intends to object to Plaintiffs’ proposal for consolidated multi-plaintiff trials, arguing, as they have unsuccessfully argued before, that they are unduly prejudicial. The State also intends to object to the concept of preparing for more than one plaintiff’s trial at a time, arguing that it is unduly burdensome to do so. Respectfully, the Court has previously rejected both arguments, and it should do so again here.

21. Part I, Article 14 of the New Hampshire Constitution guarantees a right to “prompt justice, without delay.” The right to tort recovery is “an important substantive right,” and its infringement by the government is subject to intermediate scrutiny, with the government carrying

the burden of proof. *Petition of New Hampshire Division for Children, Youth and Families*, 175 N.H. 596 (2023) (citing *Opinion of the Justices*, 126 N.H. 554, 559 (1985)).

22. Pursuant to these principles, in 2023, Plaintiffs sought to consolidate several cases into one joint trial to improve efficiency and avoid unnecessary delays caused by trying cases individually. *See Richardson v. Marsh*, 481 U.S. 200 (1987) (observing that joint trials are often “essential” and play a “vital role” in the efficiency and fairness of the justice system). At an April 18, 2023, status conference, this Court voiced support for consolidation of trials, particularly where the facts related to liability—such as time period, location, or named abusers—overlapped significantly between cases. On November 9, 2023, the Court granted Plaintiffs’ motion to schedule what was referred to as “Trial #2,” in which six plaintiffs’ trials were to be consolidated. *See* Margin Order, dated Nov. 9, 2023 (granting Plaintiffs’ August 14, 2023, motion and scheduling consolidated “Trial #2”).

23. While the State’s Rule 11 appeal of that ruling was later dismissed as moot, the issue remains important to the efficient resolution of these cases. Although many YDC plaintiffs are opting to give the Settlement Fund a try, we currently believe that tens of plaintiffs, perhaps exceeding 100 plaintiffs, will not enter the Settlement Fund. On top of that, we expect that some plaintiffs will either withdraw from the Settlement Fund or will reject the Administrator’s settlement offer and will thereafter return to the Court intent upon proceeding to trial. Therefore, it remains imperative that the Court create a process that allows for efficient trials over a period of years, rather than decades.

24. Accordingly, Plaintiffs urge the Court to again exercise its broad discretion to allow consolidated trials as outlined in Plaintiffs’ proposed Amended CSO, just as the Court did for the “Trial #2” plaintiffs. Motions to consolidate are “addressed to the trial court’s discretion” and “will

generally be granted if the cases involve common issues of material fact or if they turn on the same principles of law, and the court can see that the trial of [the] cases will be simplified and shortened” by consolidation. Gordon J. MacDonald, *Wiebusch on New Hampshire Civil Practice and Procedure* § 41.06 (5th ed. 2024); *see also* N.H. Super. Ct. 12(b) (courts may order consolidation “as justice and convenience require”). Such motions “will usually be granted unless the party opposing can show demonstrable prejudice.” *Seguro de Servicio de Puerto Rico v. McAuto Sys. Grp., Inc.*, 878 F.2d 5, 8 (1st Cir. 1989).¹

25. Consolidated trials featuring common time periods, cottages, and/or abusers would serve to avoid wasteful delay and duplication of efforts caused by trying similar cases one at a time. As the Court has previously observed, if these cases were to proceed individually at their current pace, Plaintiffs may be denied justice for decades. Such an avoidable delay would stand in direct conflict with Plaintiffs’ important substantive right to prompt justice enshrined in Part I, Article 14, and would burden the courts with additional, unnecessary trials for years to come. For these reasons, and those articulated above, “justice and convenience” require consolidation.

26. Additionally, even as to Plaintiffs’ proposal for single-plaintiff trial dates, the same promptness and efficiency concerns are present. The State’s objection that it is burdensome to prepare for more than one trial for any single trial date should not outweigh the plaintiffs’ constitutional rights to prompt justice. In a mass litigation like this, it is also grossly inefficient to prepare for a single trial at a time. For example, under the State’s counterproposal, the Court would schedule only Maunsell, Gilpatrick, and John Doe #1 for single-plaintiff trials in 2025. If the

¹ Plaintiffs incorporate herein its prior motions and briefs in support of consolidated trials, as well as the Court’s prior ruling, including Plaintiffs’ August 14, 2023, Motion (Index #454) and Plaintiffs’ September 5, 2023, Reply to the State’s Objection (Index #490).

legislature approves the Gilpatrick settlement and the parties subsequently settle Maunsell's case and John Doe #1's case, no YDC case would go to trial in 2025.

27. Such a grindingly slow pace of resolution is not acceptable or constitutional. This Court has already recognized as much in its August 2024 CSO, wherein it scheduled multiple back-up plaintiffs for each trial date. *See* August 2024 CSO at 1-8, 22-25. The Court should do the same now by approving Plaintiffs' proposal, which contemplates a pool of multiple potential plaintiffs who can be prepared in time for each of the trial dates in 2025 and 2026. No doubt, the parties and the Court will be kept very busy in preparing these cases for trial. But as this Court previously observed, "the best way to avoid trying cases is to try cases." August 2024 CSO at 7 (quoting an unnamed judge). By pushing forward on an aggressive schedule, the parties will be properly incentivized to settle the cases that can settle, and promptly and efficiently try the cases that cannot.

IV. Conclusion

For the foregoing reasons, Plaintiffs respectfully request that the Court grant this motion, enter Plaintiffs' proposed Second Amendment to Case Structuring Order of August 15, 2024, attached hereto as Exhibit A, and grant such other relief as the Court deems necessary and just.

Respectfully submitted,

PLAINTIFFS

By and through counsel,

Dated: March 5, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2025, a true and accurate copy of this Motion has been served electronically through the Court's e-service system on all attorneys and all other parties who have entered electronic service contacts (e-mail addresses) in this case.

/s/ W. Daniel Deane
W. Daniel Deane, Esq.

EXHIBIT A

STATE OF NEW HAMPSHIRE

ROCKINGHAM, ss.

SUPERIOR COURT

CASE NO. 217-2020-CV-00026
and all consolidated YDC and YDSU CASES
DAVID MEEHAN

v.

STATE OF NEW HAMPSHIRE,
DEPARTMENT OF HEALTH AND HUMAN SERVICES, et al.

(IN RE YDC AND YDSU LITIGATION)
(JUDGE SCHULMAN ASSIGNED CASES)

(This Order Applies Only to Cases Without Contractor Defendants
That Are Assigned to Judge Schulman)

[PROPOSED] SECOND AMENDMENT TO CASE STRUCTURING ORDER
OF AUGUST 15, 2024

Having reviewed the parties' proposals regarding case scheduling and trials for 2025 and 2026, the Court enters the following second amendment to the August 15, 2024, Case Structuring Order ("August 2024 CSO"):

1. The Court's August 2024 CSO and the Court's December 9, 2024, Amendment to the CSO are herein incorporated and remain in full force and effect, except as modified herein.
2. The trial schedule set forth in on pages 23-25 of the August 2024 CSO is superseded and replaced by the trial schedule set forth in the Addendum to this Order.
3. This schedule assigns 17 plaintiffs to eight trial slots between May 2025 and October 2026. It assumes some claims will settle before trial and includes as many as three consolidated trials (Trial 8, Trial 9, and Trial 10) wherein up to three plaintiffs with similar claims of abuse, during overlapping periods, at the same cottages, and involving some of the same

abusers, supervisors, and managers, will be permitted to present their claims jointly in a single trial.

4. Because the Court anticipates the State will appeal this Order granting consolidated trials, the first potential consolidated trial is not proposed until May 4, 2026. It is hoped that will provide sufficient time for the State's anticipated appeal to be decided by the Supreme Court. Because the Supreme Court previously accepted the State's Supreme Court Rule 11 appeal of a prior order consolidating cases for trial (which was subsequently dismissed as moot), in the interest of efficiency, this Court will promptly approve a request for interlocutory appeal of this issue.

5. Trials 3 through 7 will all be single-plaintiff trials.

6. The first trial on this schedule is Trial 3. As no other case is ready for trial by May 5, 2025, Natasha Maunsell is the only plaintiff that can go forward on this date.

7. From Trial 4 to Trial 7, the Court will select plaintiffs for single-plaintiff trials in the order of priority listed in the Addendum. As set forth in the August 2024 CSO, the default order of priority for trial is the order of case filing. This order of priority, however, is subject to exceptions by agreement of the parties or for good cause. For example, after Maunsell, Michael Gilpatrick has the next highest priority followed by John Does #1 and #2, and so on. At Plaintiffs' request, however, John Doe #4 and John #30 have dropped in priority due to their present status in federal custody. The trial schedule sets trial dates for them after their projected release dates.

8. Because only Mr. Gilpatrick and John Doe #1 could be ready for a trial by August 4, 2025, those are the only possible plaintiffs listed for Trial 4. Because Mr. Gilpatrick's case should be finally settled or tried before September 2025, the highest priority plaintiff for Trial 5 is John Doe #1 (unless his case settles before September 2025). This convention for single plaintiff trials continues through Trial 7.

9. For case scheduling purposes (motion deadlines, disclosure deadlines, discovery deadlines, etc.) each plaintiff is assigned to a trial track. For example, although only one plaintiff may proceed to trial in the Trial 4 slot, John Doe #1 shall proceed under the case deadlines set forth on page 19 of the August 2024 CSO, tracking backwards from a jury selection date of August 4, 2025, with Mr. Gilpatrick's case having already been prepared under the case deadlines for a March 2025 trial. John Doe #2, John Doe #6, and Jane Doe #4 shall all proceed under the same case deadlines tracking to a jury selection date of September 29, 2025, John Doe #1's case having already been prepared in accordance with the Trial 4 deadlines.

10. Status conferences will be scheduled at least two months before jury selection for each trial (except for Trial 4, where a conference must be held only one month before). At each status conference, the Court and the parties will discuss the upcoming trial dates, and the Court will assign one trial plaintiff for the next trial date (or dates). For example, at the status conference in June or July 2025, the Court will assign the trial plaintiff for Trial 4 as well as the trial plaintiff for Trial 5. At the status conference in October 2025, the Court will assign the trial plaintiff for Trial 6, and so on.

11. At each status conference the Court will also schedule the trial management conference ("TMC") for any case (or cases) designated for trial at that conference. All pretrial deadlines triggered by the scheduling of the TMC (*see* Sup. Ct. R. 35 and page 20 of the August 2024 CSO) will apply from that point forward for each case designated for trial. Additionally, as stated in the August 2024 CSO, all depositions, including expert depositions, shall be completed prior to the TMC in each case designated for trial, with possible exceptions for good cause.

12. Mediation deadlines are set for each plaintiff and are scheduled to occur more than 120 days before jury selection for the trial track to which they are assigned. The parties are strongly

urged to comply with this schedule as it will facilitate the Court's effort to select definitive trial plaintiffs at each status conference. The schedule is designed so that mediations for "on deck" cases will be completed before the status conferences for those cases. The parties are also ordered to report any settlements to the Court within one week of the settlement. As trial notices are sent to the juror pool approximately 60 days before jury selection, the Court would appreciate timely notification of all settlements.

13. Trial 8 is designated as a consolidated trial with three plaintiffs proceeding together. Case deadlines in all three cases are linked to jury selection on May 4, 2026. All three plaintiffs will have mediations no later than January 2026. At the status conference in March 2025, the Court will schedule a TMC for a trial with any of the three plaintiffs who have not settled.

14. Two alternatives are proposed for Trial 9. If any of the first 11 plaintiffs listed in this schedule have neither settled their case nor had a trial, the highest priority remaining plaintiff shall be designated for trial on this date. If all the previous cases have been tried and/or otherwise resolved, then the schedule alternatively provides for a second consolidated trial for three designated plaintiffs, following the same procedure as the Trial 8 consolidated trial. A third consolidated trial with another three plaintiffs is set forth for Trial 10. To the extent that the State prevails on its appeal challenging consolidated trials, these consolidated trials will be severed, and the plaintiffs will proceed in order of priority.

15. While this second amendment to the August 2024 CSO is intended to be as comprehensive as possible, it cannot foresee all contingencies. It is inevitable that further amendments will be required as the litigation proceeds. For example, if the mediations are wildly successful in resolving cases, it may be necessary to add plaintiffs to the roster of plaintiffs scheduled for trial in 2025 and 2026. Plaintiffs' counsel have informed this Court that further

plaintiffs are available to substitute into the 2025-2026 trial schedule, if necessary. On the other hand, if the mediations are wildly unsuccessful, the parties may wish to reshuffle the order of trials. The timing and nature of the Supreme Court's ruling on consolidated trials could also impact the schedule in ways that necessitate further amendment. Nevertheless, for the time being, this schedule provides the parties with some measure of clarity for organizational and preparation purposes.

SO ORDERED.

Date: _____

Andrew R. Schulman,
Presiding Justice

ADDENDUM				
Trial #	Jury Selection	Status Conference	Mediation Deadlines	Plaintiffs (in order of priority)
3	May 5, 2025	N/A	Mar. 19, 2025	1) 217-2021-CV-00500 (Maunsell) *Apply case deadlines based on Trial 3 jury selection
4	Aug. 4, 2025	June/July 2025	John Doe #1 by end of March 2025	2) 217-2021-CV-00479 (Gilpatrick) 3) 217-2021-CV-00483 (John Doe #1) *John Doe #1 applies case deadlines based on Trial 4 jury selection
5	Sept. 29, 2025	June/July 2025	John Does #2, #6, and Jane Doe #4 by May 2025	3) 217-2021-CV-00483 (John Doe #1) 4) 217-2021-CV-00517 (John Doe #2) 5) 217-2021-CV-00521 (John Doe #6) 6) 217-2021-CV-00576 (Jane Doe #4) *John Does #2 and #6, and Jane Doe #4 apply case deadlines based on Trial 5 jury selection
6	Jan. 5, 2026	October 2025	John Doe #30 by August 2025	4) 217-2021-CV-00517 (John Doe #2) 5) 217-2021-CV-00521 (John Doe #6) 6) 217-2021-CV-00576 (Jane Doe #4) 7) 217-2021-CV-00568 (John Doe #30) *John Doe #30 applies case deadlines based on Trial 6 jury selection
7	Mar. 2, 2026	December 2025	John Doe #4 by October 2025	5) 217-2021-CV-00521 (John Doe #6) 6) 217-2021-CV-00576 (Jane Doe #4) 7) 217-2021-CV-00568 (John Doe #30) 8) 217-2021-CV-00519 (John Doe #4) *John Doe #4 applies case deadlines based on Trial 7 jury selection
8	May 4, 2026	March 2025	All three Trial 8 plaintiffs by January 2026	Consolidated trial: 9) 217-2022-CV-00039 (John Doe #115) 10) 217-2022-CV-00100 (John Doe #166) 11) 217-2022-CV-00186 (John Doe #274) *All three Trial 8 plaintiffs apply Trial 8 case deadlines
*9	Aug. 3, 2026	June 2026	N/A	To the extent any of the first 11 listed plaintiffs have not either settled or had a trial, the highest priority remaining plaintiff takes this trial date. If not, the apply the alternative Trial 9 as provided immediately below.
*9	Aug. 3, 2026	June 2026	All three Trial 9 plaintiffs by April 2026	Alternative consolidated trial: 12) 217-2021-CV-00573 (Jane Doe #3) 13) 217-2022-CV-00190 (Jane Doe #26) 14) 217-2022-CV-00279 (Jane Doe #36) *All three Trial 9 plaintiffs apply the Trial 9 case deadlines
10	Oct. 5, 2026	August 2026	All three Trial 10 plaintiffs by June 2026	Consolidated trial: 15) 217-2022-CV-00293 (John Doe #317) 16) 217-2022-CV-00327 (John Doe #359) 17) 217-2022-CV-00924 (John Doe #407) *All three Trial 10 plaintiffs apply the Trial 10 case deadlines