

VIRGINIA:

IN THE CIRCUIT COURT OF SURRY COUNTY

SANDRA L. WYATT, et al.)	
)	
Plaintiffs,)	
)	Case No. CL06000069-00
v.)	
)	
SUSSEX SURRY, LLC, et al.)	
)	
Defendants.)	

[Defendants’ Proposed] ORDER ON EXPERT DISCOVERY

THIS MATTER is before the Court on the motion of Defendants Synagro Central, Inc. and Sussex Surry, LLC (collectively, Defendants), to compel the Plaintiffs Sandra Wyatt, Willis E. Wyatt, Jr., Robert Wyatt, Eva S. Gregory, Leverette B. Gregory, Jr., and Teresa E. Gregory (collectively, Plaintiffs) to produce expert evidence of causation in the above-captioned matter. Having carefully considered Defendants’ Motion, Plaintiffs’ Opposition, and the record of this case, it is hereby ORDERED that Defendants’ Motion is GRANTED. It is further ORDERED as follows:

1. Plaintiffs shall serve on Defendants, within ninety (90) days of this order, the names and complete reports of the experts that Plaintiffs will rely upon at trial to establish that the Defendants caused their injuries;
2. Plaintiffs shall serve on Defendants, within one hundred (100) days of this order, all evidence, documents, and other materials of any kind relied upon by the experts in forming their opinions and writing their reports; and

3. Defendants shall, within sixty (60) days following the receipt of the names and reports of the experts produced by Plaintiffs pursuant to paragraph one, conduct and complete depositions of Plaintiffs' experts.

It is further ORDERED that the following schedule is established for motions regarding the admissibility of Plaintiffs' experts:

1. Defendants shall file any motions and supporting memoranda regarding the admissibility of testimony of Plaintiffs' experts within thirty (30) days of the completion of depositions of Plaintiffs proffered experts.

2. Plaintiffs shall file any memoranda in opposition to any motions by Defendants regarding the admissibility of Plaintiffs experts no later than twenty (21) days following the service of any motions or memoranda of Defendants on the admissibility of Plaintiffs' experts.

3. Defendants shall file any replies to any opposition memoranda filed by Plaintiffs no later than fifteen (15) days following the service of any opposition memoranda from the Plaintiffs.

4. This Court shall, if it is necessary, set a date for a hearing on this matter at its discretion.

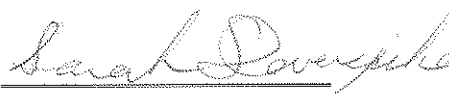
IT IS SO ORDERED.

Dated: _____

Circuit Judge

CERTIFICATE OF SERVICE

I hereby certify on July 12, 2007, prior to filing, true and correct copies of the foregoing *Defendants' Motion To Compel Plaintiffs' Evidence Supporting Causation* and the accompanying *Defendants' Proposed Order on Expert Discovery* were served by electronic mail on counsel for Plaintiffs, H. Bishop Dansby, 4060 Walnut Hill Dr., Keezletown, VA 22832, and Christopher Nidel, 1111 14th St., Suite 777 Washington, DC 20005, and on counsel for Defendant Sussex Surry LLC, Stewart Leeth, McGuire Woods, One James Center, Richmond Virginia 23219.



Sarah S. Doverspike
Counsel for Defendant Synagro Central, Inc.