

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

---

**IN RE: MI WINDOWS AND DOORS, INC.  
PRODUCTS LIABILITY LITIGATION**

---

**MDL NO: 2333**

**LAKES OF SUMMERVILLE, INC. AND MI WINDOWS AND DOORS, INC. JOINT  
PROPOSED TOPICS FOR SEPTEMBER 19, 2012  
MULTIDISTRICT LITIGATION SCHEDULING CONFERENCE**

In anticipation of the September 19, 2012 Multidistrict Litigation (“MDL”) Scheduling Conference, Plaintiff Lakes of Summerville, Inc. and Defendant MI Windows and Doors, Inc. (“MIWD”), hereby jointly submit the following suggested topics.

**I. GENERAL TOPICS FOR CONSOLIDATED ACTIONS**

1. Case Management Order No. 2
2. Case Management Order No. 3
3. Confidentiality Agreement entered, and entry of Stipulated Clawback Order;
4. Document Depository;
5. Discovery scope and limitations as to merits and class certification;
6. Discovery scope and limitations as to electronically-stored information;
7. Plaintiff Profile Forms;
8. Home Inspections;
9. Joinder of Lakes of Summerville and *Johnson*;
10. Settlement and Alternative Resolutions.

Dated: September 18, 2012

Respectfully submitted,

s/ Catherine H. McElveen  
H. Blair Hahn, Esquire  
Christiaan A. Marcum, Esquire  
Catherine H. McElveen, Esquire  
RICHARDSON, PATRICK,  
WESTBROOK, &  
BRICKMAN, LLC  
1037 Chuck Dawley Blvd., Bldg. A  
Mt. Pleasant, South Carolina 29464  
Telephone: (843) 727-6500

W. H. Bundy, Jr., Esquire  
M. Brent McDonald, Esquire  
SMITH, BUNDY, BYBEE &  
BARNETT, P.C.  
Post Office Box 1542  
Mt. Pleasant, South Carolina 29465-  
1542  
Telephone: (843) 881-1623

**K&L GATES LLP**  
Attorneys for Defendant, MI Windows and Doors, Inc.  
134 Meeting Street, Suite 200  
Charleston, South Carolina 29401  
Telephone: 843.579.5619  
Facsimile: 843.579.5601

By /s/ Carol C. Lumpkin  
Carol C. Lumpkin  
Lead Counsel  
Florida Bar No. 0797448  
carol.lumpkin@klgates.com

By /s/ Richard Farrier, Jr.  
Richard Farrier, Jr.  
Liaison Counsel  
South Carolina Bar No. 772  
richard.farrierjr@klgates.com

Attorneys for Lakes of Summerville, Inc. Attorneys for MI Windows and Doors, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 18th day of September 2012, I electronically filed the foregoing with the United States District Court for South Carolina by using the CM/ECF system, which will send a notice of electronic filing to all counsel or parties of record.

/s/ Carol C. Lumpkin  
Carol C. Lumpkin