

MDL NOS. 13-0123, 13-0130 and 13-0418

IN RE MARCH 29, 2012 AND APRIL 20, §
2012 HAIL STORM LITIGATION §

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IN THE DISTRICT COURT

HIDALGO COUNTY, TEXAS

206TH JUDICIAL DISTRICT

**RECOMMENDATION NO. 5 OF SPECIAL MASTER REGARDING REVISED
MASTER DISCOVERY FOR RESIDENTIAL CASES**

Pursuant to my appointment as Special Master in the above-referenced MDL proceedings, I hereby recommend that the following sets of written discovery, attached hereto as Exhibits 1 through 9, be released as Revised Master Discovery for Residential Cases to be utilized in these proceedings:

- Exhibit 1 Discovery to Plaintiffs, including Interrogatories and Requests for Production of Documents;
- Exhibit 2 Claim Specific Requests for Production of Documents to Defendant Insurer;
- Exhibit 3 Claim Specific Interrogatories to Defendant Insurer;
- Exhibit 4 Institutional Requests for Production of Documents to Defendant Insurer;
- Exhibit 5 Institutional Interrogatories to Defendant Insurer;
- Exhibit 6 Requests for Production of Documents to Defendant Adjusting Company;
- Exhibit 7 Interrogatories to Defendant Adjusting Company;
- Exhibit 8 Requests for Production of Documents to Individual Defendant;
- Exhibit 9 Interrogatories to Individual Defendant.

This revised set has been adopted in order to address typographical errors and an omission. It is expressly understood and agreed that all parties shall retain the right to object in response to the Revised Master Discovery for Residential Cases after being served with the

discovery, following completion of early mediation as required by Section VI of Case Management Order No. 1. The parties further agree that responses and objections shall be served in accordance with the time and manner required by the TEXAS RULES OF CIVIL PROCEDURE.

IT IS SO RECOMMENDED.

SIGNED this date 1/14/24.



ROBERTO L. RAMIREZ
Special Master