

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

<b>In re:</b>	)	
	)	<b>Case No. 06-10179</b>
<b>OCA, INC., et al,</b>	)	
	)	<b>Chapter 11</b>
<b>Debtors.</b>	)	
	)	
	)	
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**RESPONSE TO PROPOSED TIMELINE  
FOR DOCTOR'S SPECIFIC DISCOVERY**

The debtors' proposed timeline will preclude the doctors -- the very individuals which are named as defendants in these adversary proceedings -- to meaningfully participate in their own defense. The debtors have used the stay issued by this Court to refuse to respond fully to the discovery issued to date. *See in globo* Exhibit "A". Ultimately, the production in this case will be thousands of pages. That volume of information will then need to be handled logistically such that the doctors (who are most often in different states than their counsel before this Court) may be able to review these documents and work with counsel to see what information is missing, what more needs to be gathered, and to prepare for depositions. This process will obviously take some time. And there will obviously be discovery disputes, which will also take time. Despite all of the foregoing, the debtors, for example, propose that they will not even respond to the doctors' discovery until December 4, but that the doctors must begin taking the OCA depositions on November 20, and must complete such depositions by December 15. This would be very unfair.

There is a tremendous amount of information which will be generated through the discovery process in this case. The doctors have an absolute, indeed constitutional, right to

participate meaningfully. The key word here is meaningfully. The proposal of the debtors would deny the doctors this right.

Dr. Halliburton also objects to quad-tracking.

Previously, it was understood that these procedures do not implicate doctors involved in pre-petition litigation in other forums. Debtors are apparently now arguing to the contrary. To the debtors' position in this regard Drs. Packard and Skibell, as litigants in a prior Texas action, object. To the extent that they are found subject to these proceedings, they join in the above response.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing pleading was served on the parties listed below by telecopy this 15th day of November, 2006.

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