witnesses in each of the Related Actions and future consumer actions based on the acceleration defect in Defendants' vehicles. *See In re Cuisinart Food Processor Antitrust Litig.*, 506 F. Supp. 651, 655 (J.P.M.L. 1981) (stating that transfer under § 1407 would "effectuate a significant overall savings of cost and a minimum of inconvenience to all concerned with the pretrial activities"). Coordination or consolidation will eliminate the possibility of duplicative discovery by enabling a single judge to formulate a pretrial program to coordinate discovery in these actions. *See In re A.H. Robins Co., Inc., "Dalkon Shield" IUD Prods. Liab. Litig.*, 406 F. Supp. 540, 542 (J.P.M.L. 1975) (stating that transfer under § 1407 was "necessary in order to prevent duplication of discovery"); *In re Nat'l Airlines, Inc. Maternity Leave Practices & Flight Attendant Weight Program Litig.*, 399 F. Supp. 1405, 1406-07 (J.P.M.L. 1975) (stating that "transfer under § 1407 is clearly necessary in order to prevent duplicative discovery" that would result from common factual issues).

3. *Coordination or Consolidation of These Actions Will Promote the Just and Efficient Conduct of These Actions.*

The various pretrial disputes likely to arise in these overlapping and parallel actions will be virtually identical, including issues concerning the sufficiency of the pleadings, the nature and scope of discovery, and questions regarding privilege. The Panel has long recognized that overlapping and parallel actions asserting similar claims and based upon similar complex factual questions are particularly well-suited for consolidation or coordination pursuant to § 1407 due to the potential for conflicting pretrial rulings on common questions of fact and duplicative pretrial proceedings in the absence of consolidation or coordination. *See, e.g., In re First Nat'l Bank, Havener, Okla. (First Mortgage Revenue Bonds) Sec. Litig.*, 451 F. Supp. 995, 997 (J.P.M.L. 1978) (holding that transfer under § 1407 was "necessary, even though only two actions [were] involved, in order to prevent duplicative pretrial proceedings and eliminate the possibility of