

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK DIVISION**

<p>IN RE: PROTON-PUMP INHIBITOR PRODUCTS LIABILITY LITIGATION (NO. II)</p> <p>This Document Relates to: ALL ACTIONS</p>	<p>2:17-md-2789 (CCC)(MF) (MDL 2789)</p> <p>JUNE 12, 2018 STATUS CONFERENCE JOINT STATUS REPORT AND PROPOSED AGENDA</p>
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Pursuant to Case Management Order No. 15 (Dkt. No. 209), the parties hereby submit their Joint Status Report and Proposed Agenda in advance of the June 12, 2018 Status Conference.

I. STATUS REPORT

Since the last status conference, the parties have submitted the parties' proposed Case Management Order: No. 13 (Science Day); No. 14 (Management of Timekeeping and Related Common Benefit Issues); and No. 15 (on the May 1, 2018 Status Conference). Pursuant to CMO No. 15, the parties have conferred on a tolling agreement and are diligently working towards being able to provide the Court with a proposed agreement at the next conference. Additionally, the parties have continued to confer on a Defense Fact Sheet, 30(b)(6) Depositions, and a Scheduling Order and Document Production Schedule that include "soft caps" on document productions and depositions. The parties will be prepared to discuss the status of these discussions at the next conference. With respect to outstanding issues related to the Scheduling Order and Document Production Schedule, the parties have made separate submissions to the Court explaining their respective positions.

At the time of this filing, approximately 4493 potentially related actions with 5011 plaintiffs are pending in federal court.

Currently, approximately 91 potentially related state court actions with 91 plaintiffs are pending in the Delaware Superior Court, New Castle County, before Judge John A. Parkins, and one related state court action with 3 plaintiffs is pending in the Missouri Circuit Court, Twenty-Second Judicial Circuit (City of St. Louis) before Judge Michael K. Mullen. There is a single plaintiff appellate case pending before the Ninth Circuit Court of Appeals. (*Bekins v. AstraZeneca Pharmaceuticals LP, et al.*, No.16-02732 (S.D. Cal. Mar. 7, 2017), *appeal docketed*, No. 17-55461 (9th Cir. Apr. 5, 2017).

There are approximately 65 new potentially related state court cases involving approximately 169 plaintiffs filed in the last few months, which include the following, all of which the parties have agreed to include on the Tolling Agreement:

California:

Los Angeles County – 1 case with 1 plaintiff

Orange County – 1 case with 1 plaintiff

San Diego County – 1 case with 13 plaintiffs

Illinois:

Cook County – 1 case with 65 plaintiffs

St. Clair County – 1 case with 29 plaintiffs

New Jersey:

Bergen County – 36 cases each with 1 plaintiff

Camden County – 1 case with 1 plaintiff

New York:

New York County – 18 cases each with 1 plaintiff

Ohio:

Clinton County – 1 case with 1 plaintiff

Franklin County – 1 case with 1 plaintiff

Pennsylvania:

Philadelphia County – 3 cases each with 1 plaintiff

II. PROPOSED AGENDA FOR 06/12/18 STATUS CONFERENCE

The Parties have met and conferred and propose the following Agenda:

- Update on Tolling Agreement;
- Update on Plaintiff Fact Sheets Deadlines, Extensions, Compliance;
- Providing PFS Reporting to the PSC in Advance of Status Conferences;
- Scheduling Order, Document Production Schedule, and proposed discovery limits for the AstraZeneca and Takeda Defendants;
- Update on Defense Fact Sheet;
- Update on search term negotiations;
- Status of scheduling for 30(b)(6) depositions; and
- Conference Dates for Future 2018 PPI Case Management Conferences.

III. TELEPHONIC MONITORING OF THE CASE MANAGEMENT CONFERENCE

As instructed by the Court, counsel has arranged for a telephonic conference line so interested attorneys can monitor the proceedings. Dial-in information is as follows:

Dial In: 800-747-5150

Participant Code: 1875000

Chairperson Code: 1602 (To be utilized by the Court only)

Note that the status conference is scheduled to begin at 1 p.m. eastern.

Dated: June 8, 2018