

approved the parties' stipulation on March 22, 2021. Given the disposition of *Barron*, the parties will confer and submit a proposal to the Court.

In addition, the parties' stipulation regarding motions in limine did not address Atrium's Motion in Limine No. 5 in *Barron* (*Barron* Dkts. 167 & 226), because it had not been ruled on by the Court before the stipulation was agreed to. The parties will also confer regarding a proposal to the Court regarding submission of a comparable motion to the Court in *Luna*.

III. Outstanding Depositions

The parties agreed to reserve depositions of family members (other than spouses who are making claims) until such time as they are designated as trial witnesses.

IV. Alternative Dispute Resolution

The parties have continued to engage in good faith and productive dialogue.

V. Outstanding Meet and Confer Issues

The parties continue to meet and confer regarding various other matters, but none has reached an impasse requiring court intervention.

Dated: July 1, 2021

Respectfully submitted,

/s/ Paul LaFata

Mark S. Cheffo

Katherine Armstrong

Paul LaFata

DECHERT LLP

Three Bryant Park

1095 Sixth Avenue

New York, NY 10036

Tel: (212) 698-3500

Fax: (212) 698-3599

mark.cheffo@dechert.com

katherine.armstrong@dechert.com

paul.lafata@dechert.com

Pierre A. Chabot – NHBA # 17606

DEVINE MILLIMET

111 Amherst Street

Manchester, NH 03101

Tel: (603) 695-8780

pchabot@devinemillimet.com

Attorneys for Defendant,

Atrium Medical Corporation

CERTIFICATE OF SERVICE

I hereby certify that on July 1, 2021, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of Notice of Electronic Filing to all counsel of record.

/s/ Paul LaFata

Paul LaFata