

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In Re: Levaquin Products)	
Liability Litigation,)	File No. 08-md-1943
)	(JRT/AJB)
)	
)	
)	Minneapolis, Minnesota
)	November 10, 2009
)	1:45 P.M.
)	

BEFORE THE HONORABLE **JOHN R. TUNHEIM**
UNITED STATES DISTRICT COURT JUDGE
(**STATUS CONFERENCE VIA TELEPHONE**)

APPEARANCES

For the Plaintiffs:	RONALD S. GOLDSER, ESQ.
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	TROY GIATRAS, ESQ.
	WILLIAM BROSS, ESQ.
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	RICHARD SCHULTE, ESQ.
For the Defendant:	JOHN DAMES, ESQ.
	WILLIAM ESSIG, ESQ.
	WILLIAM H. ROBINSON, JR., ESQ.
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Proceedings recorded by mechanical stenography;
transcript produced by computer.

1 1:45 P.M.

2 (In chambers.)

3 THE COURT: Good afternoon, everyone. This is
4 for the record MDL number 08-1943, In Re: Levaquin
5 Products Liability Litigation. We have a status conference
6 scheduled this afternoon by teleconference. Let's have
7 counsel note their appearances beginning with the
8 plaintiff.

9 MR. GOLDSER: Good afternoon, Your Honor. Ron
10 Goldser for plaintiff.

11 MR. SAUL: Good afternoon, Your Honor. Lewis
12 Saul and Kevin Fitzgerald for plaintiffs.

13 MR. CIALKOWSKI: Good afternoon, Your Honor.
14 David Cialkowski with Zimmerman Reed for the plaintiffs.

15 MS. FLAHERTY: Good afternoon, Your Honor.
16 Yvonne Flaherty with Lockridge Grindel Nauen for
17 plaintiffs.

18 MR. GIATRAS: Good afternoon, Your Honor. Troy
19 Giatras here in West Virginia.

20 MR. SCHULTE: Good afternoon, Your Honor.
21 Richard Schulte from Dayton, Ohio.

22 MR. BROSS: Good afternoon, Your Honor. Bill
23 Bross with Heninger Garrison Davis for plaintiffs.

24 THE COURT: Okay. For the defense?

25 MR. DAMES: John Dames, Your Honor, and Bill

1 Essig.

2 MR. ROBINSON: Bill Robinson, Your Honor.

3 MS. VAN STEENBURGH: Tracy Van Steenburgh, Your
4 Honor.

5 THE COURT: Okay. Very well. We have an amended
6 suggested agenda for today.

7 Mr. Goldser, do you want to get us started?

8 MR. GOLDSER: I would be happy to, Your Honor.

9 Let me start by saying that when the notion of this status
10 conference came around, I had a brief exchange with my
11 friends, defense counsel, and told them, and I will tell
12 the Court, that we do not have a lot to talk about today
13 because there are a number of things that are out there and
14 pending that will have a substantial bearing on what
15 direction we go and how we can respond to some of the
16 issues.

17 So while I'm happy to take the lead and tick them
18 off, I have a feeling to a great extent you're going to be
19 hearing from my friends on the defense side of the aisle
20 more than us, although I'm sure we have something to say
21 about each of the agenda items.

22 So, for example, the number of cases pending,
23 both in MDL and in state courts, that's a report that I
24 believe Mr. Dames always gives us.

25 THE COURT: Go ahead, Mr. Dames.

1 MR. DAMES: Yes. Right now, Your Honor, we have
2 the total number of MDL cases served are 240. There are
3 five cases pending transfer -- that are pending that are
4 subject to transfer to the MDL. So all together, that's
5 245. The total number of state court cases served is now
6 at 76.

7 THE COURT: And those are all in New Jersey?

8 MR. DAMES: No. Predominantly, there are over 60
9 in New Jersey, but we have now a little clump of cases.
10 I'm sure it's the first time you've heard of cases
11 described as a clump, but they are in Madison County,
12 Illinois.

13 THE COURT: Okay.

14 MR. GOLDSER: And, Your Honor, Ron Goldser again.
15 I believe there are some cases also in California that
16 Mr. Dames didn't address.

17 MR. DAMES: I am sorry. There is one case in
18 California.

19 MR. GOLDSER: With multiple plaintiffs, I
20 believe?

21 MR. DAMES: Yes.

22 MR. GOLDSER: Okay. And I thought I had heard
23 some talk about getting a consolidated proceeding going in
24 California. I don't know if they can do that with just the
25 one case.

1 MR. DAMES: It might be difficult.

2 THE COURT: Okay. Anything else on the number of
3 cases, then? Anything on the status of the 60 plus cases
4 in New Jersey?

5 MR. GOLDSER: From plaintiffs' perspective, Your
6 Honor, what we know is that documents have been disclosed
7 by the defense. I believe that deposition transcripts from
8 the MDL have been acquired by counsel in New Jersey. I am
9 not aware that anything beyond that level of discovery has
10 occurred at this stage of the game.

11 There are interrogatories and requests for
12 documents that are outstanding. I'm not aware that those
13 have been answered. I'm not aware that there are any
14 depositions scheduled. I'm not aware that there has been a
15 trial date set of any kind in New Jersey. The next status
16 conference that I'm aware of is December 4th.

17 Mr. Dames, can you shed any further light on
18 those?

19 MR. DAMES: No. That's correct, Your Honor. The
20 discovery has not yet been completed, the written
21 discovery, and submitted to the plaintiffs. We still have
22 a bit of time on that, and the next status is on December
23 4th. We have no depositions that have been taken, and some
24 documents have been transmitted, but other than that, we
25 are still very much in the infancy, I believe, in New

1 Jersey.

2 MR. GOLDSER: And, Your Honor, I know that Judge
3 Higbee had indicated in the last status conference that she
4 was inclined to get in touch with you, just as you had
5 previously indicated that you were inclined to get in touch
6 with her.

7 I don't know if that connection has yet been
8 made.

9 THE COURT: It hasn't been made yet, but we will
10 get that done soon here. I have been traveling a little
11 bit too much recently, so I will get it done.

12 MR. GOLDSER: Okay. I appreciate that. The next
13 item on the list is the status on the case selection
14 process. The status of that is that both sides engaged in
15 some conversations about what cases should be included,
16 what cases should not be.

17 You'll recall we discussed that issue at the
18 motion to compel on October 2nd. We really haven't made
19 any further progress on that issue since that time. Your
20 Honor is aware that we had filed a motion. We had talked
21 about filing that motion on October 2nd.

22 The gist of the motion was for consolidation of
23 cases for trial, but we also added to that the idea that
24 the Court should help us select the cases to be prepared
25 for trial because we have been unable to agree. That

1 motion is presently scheduled for hearing, as I recall, on
2 Monday, November 23rd, at 10:30 in the morning.

3 I understand that the Court's travel schedule may
4 preclude us from having the hearing that day. Obviously,
5 we hope we can, and we hope it fits with the Court's
6 schedule. From plaintiffs' perspective, that's one of the
7 big issues that has us held up in trying to move the case
8 forward.

9 While we very much want to hold onto the August
10 trial date, there is a substantial difference between
11 preparing three cases as we proposed for trial, and quite
12 honestly, I'm not sure how many defendants are proposing to
13 be prepared for trial at this stage of the game. I didn't
14 pick up on that in their response brief on the pending
15 motion.

16 So the motion is important to us to select the
17 cases. It's scheduled for hearing on November 23rd. I
18 hope we can have that hearing on November 23rd, and until
19 we figure out what cases are going to be prepared on the
20 plaintiffs' side, we feel like we can't make a whole lot of
21 progress on a lot of other things.

22 THE COURT: I think we will be able to go forward
23 with that hearing. That's the plan right now.

24 MR. DAMES: Your Honor, I feel compelled to, part
25 of the reason why this was an agenda item that the

1 defendants requested be placed on there is that part of the
2 thing we have been grappling with, and it has been elusive
3 to try to reach a resolution on it, and it should not have
4 been, in my opinion.

5 We asked for the plaintiffs to -- we tried to
6 arrange for an agreement in which we would both, of course,
7 select cases so that we would then submit a list of cases
8 to the Court. We ended up ultimately and after some
9 prolonged back and forth that plaintiffs suggested five
10 cases they wanted to select, and we -- trying to reach a
11 manageable number of cases for the final consideration by
12 the Court, however they would be selected for trial.

13 We suggested that we would have two cases of our
14 own if plaintiffs would remove one of the five, so we would
15 have a grand total of six cases. We thought that would be
16 more than accommodating since it gave plaintiffs the
17 majority of cases to select, and we -- that was ultimately
18 rejected, and of course, the motion for consolidation was
19 filed.

20 We thought that was quite fair, and we thought it
21 would ultimately end up with a number that could certainly
22 more than adequately be prepared for selection, ultimately
23 one of the six for trial in August and then to proceed with
24 the others.

25 I don't fully understand why that wasn't

1 acceptable to the other side, but I do think it was
2 something that was workable.

3 MR. SAUL: Lewis Saul here, Your Honor. I think
4 we're having the bellwether argument right now, and I
5 thought it was going to be argued on November 23rd after
6 submission of briefs, which has occurred.

7 THE COURT: It's always nice to get a preview,
8 Mr. Saul. Go ahead.

9 MR. SAUL: I'm sorry.

10 THE COURT: I just said, it's always nice to get
11 a little preview, so go ahead, Mr. Saul.

12 MR. SAUL: The Court did not hear me?

13 THE COURT: No. Go ahead.

14 MR. SAUL: Oh, I'm sorry. I was just saying,
15 Your Honor, that I thought that the bellwether selection
16 process was going to be argued at the November 23rd
17 hearing, and it sounds like it was just argued today by
18 defendants.

19 MR. DAMES: If I may interpret something for
20 Lewis, Your Honor, I apologize, but it is -- I interpreted
21 Judge Tunheim's remarks, Lewis, to suggest that I was
22 previewing the argument, and I suspect there was a smile
23 about that.

24 THE COURT: It's okay. Anything you would like
25 to say about it, Mr. Saul?

1 MR. SAUL: Not at this time, but we would like to
2 argue our motion for consolidation at the hearing on the
3 23rd, which we think is the appropriate way to approach the
4 trial of these cases.

5 THE COURT: That sounds good. We'll move on to
6 the next item, then.

7 MR. DAMES: This again is a defense item, Your
8 Honor. We have submitted to plaintiffs a proposed order on
9 a schedule for case-specific discovery in the Phase I cases
10 to complete the case-specific discovery in that group of
11 cases.

12 We have not received a response to that as to
13 whether that was an agreeable order or not. We think it's
14 appropriate to get that order entered with reasonable
15 dispatch. If we can get that agreement, it would be fine.

16 MR. GOLDSER: And, Your Honor, this is Ron
17 Goldser. That issue is one of the issues that so clearly
18 turns on what cases are selected for trial and that trial
19 preparation. I hadn't -- had not understood that it was an
20 order for discovery on all of the Phase I cases, so much as
21 I had understood it as a proposed schedule for discovery on
22 the cases to be prepared for bellwether trials, which might
23 very well be different.

24 I mean, the full Phase I case list is 14 cases,
25 although I think one or two may go away because plaintiffs

1 died, but, you know, we're talking about preparing three
2 cases and getting them ready completely, front-to-back
3 ready, for trial come next August. That's going to take us
4 plenty to do between now and next August just to get those
5 three cases ready, much less getting the rest of the Phase
6 I cases' work done at the same time.

7 So our position is that we really don't think
8 it's appropriate to move forward on any schedule until we
9 know what cases we're trying and that all the schedules, be
10 they the trial cases or Phase I or Phase II cases, all
11 those schedules can follow once we figure out what we're
12 doing about the trial cases, and that's why the trial issue
13 and the case selection issue is so important to us.

14 MR. ROBINSON: Your Honor, this is Bill Robinson
15 if I could respond very briefly. I had prepared this draft
16 of this discovery order for these cases, and it's
17 essentially driven by the fact that we have in CMO number 4
18 a requirement under paragraph F of that order that
19 dispositive and *Daubert* motions in any of the bellwether
20 cases -- and bellwether cases are defined as the 14, 14
21 less whatever is dismissed -- have to be filed by April 15.

22 So I put together a draft discovery schedule for
23 these cases to get the discovery done in order to comply
24 with that deadline, and maybe this is something we should
25 discuss on the 23rd when we get together, but I do think

1 given those deadlines we need some kind of discovery
2 schedule in order so that parties can get the discovery
3 done to meet that deadline.

4 MR. GOLDSER: And Ron Goldser again, Your Honor.
5 I have been operating under the proposition, and perhaps
6 it's a mistaken one, that the deadlines of April for
7 dispositive motions and *Daubert* and the motion to amend
8 complaints to allege punitive damages will refer to those
9 cases that were selected for trial preparation and not for
10 the full 14. That has been my mindset.

11 Now if that's mistaken, then I'm sure somebody
12 will correct me, but that's where I have been coming from.
13 I think we can have a schedule that works for the trial
14 selected cases. I think we can have a staggered schedule
15 beyond that for the remaining Phase I cases.

16 I think we can have a staggered schedule beyond
17 that even for the Phase II cases, but having them all teed
18 up all at the same time, particularly with an April
19 deadline for dispositive motions, does not make a whole lot
20 of sense to me, and I don't think that's where we were
21 going, but I'm happy to address it further again on the
22 23rd once we work through the case selection issues.

23 MR. DAMES: We agree, Your Honor. We think it
24 should be addressed on the 23rd. We have proposed a draft
25 order as to how it applies. Perhaps the Court could help

1 us with that on the 23rd.

2 THE COURT: Okay. Well, let's take up this along
3 with the case selection issues on the 23rd.

4 MR. GOLDSER: Okay, Your Honor.

5 MR. DAMES: Your Honor, I inadvertently skipped
6 number three, the Karkosa summary judgment motion, which we
7 are prepared to file. We are just awaiting resolution of
8 the hearing date, and we will file a summary judgment
9 motion in the Karkosa matter.

10 MS. VAN STEENBURGH: Your Honor, this is Tracy
11 Van Steenburgh. Holly and I talked about whether we should
12 schedule a hearing, and she wanted to wait, and I don't
13 know if she's had a chance to talk to you, but she wanted
14 to wait until we had this conference to decide if we want
15 to set a hearing now, and then that will tee our briefing
16 schedule off or if you wanted to go ahead and submit it,
17 have it briefed after and then set a hearing date.

18 So I defer to you on that.

19 THE COURT: We can set a date now. When would
20 all the briefing be done under the normal schedules?

21 MR. GOLDSER: Your Honor, I think Mr. Saul may
22 have something to address the Court on this motion before
23 we go much further.

24 MR. SAUL: I thought you were going to do that,
25 Ron, but I am happy to do that. We believe that we will be

1 dismissing this particular case, Karkosa, but we need a
2 final written authorization from our client or direction
3 from our client. So it may become moot in the next few
4 days.

5 THE COURT: What's the timing of that, Mr. Saul?

6 MR. SAUL: I believe we will have that within
7 three or four days.

8 THE COURT: Okay. Well let's, if it's not
9 resolved by the 23rd, on that date we will set a hearing.
10 We'll tee off the summary judgment process then.

11 MR. DAMES: Your Honor, I'm sorry. John Dames
12 again. I would suggest that if that is going to occur that
13 we not file the motion at all.

14 THE COURT: You don't need to file it right now.
15 If we, if we, if there is a final resolution in the, by way
16 of the case being dismissed, obviously there is nothing
17 more for us to do. If nothing has happened by the 23rd, we
18 will talk about the summary judgment motion and timing
19 then.

20 MR. DAMES: Okay, Your Honor.

21 THE COURT: Okay. Phase II discovery.

22 MR. GOLDSER: I think that skips item five, the
23 deposition of the prescribing physician Dr. Baniriah.

24 THE COURT: I am sorry. Now I'm skipping. Okay.

25 MR. GOLDSER: Your Honor, as I understand it,

1 this doctor has been somewhat unresponsive for a while, and
2 her history is that she was previously employed by the Mayo
3 Clinic in Scottsdale. She is now in her own separate
4 practice in Scottsdale having left the Mayo Clinic, if I
5 understand correctly, and either Mr. Saul or Mr. Fitzgerald
6 can correct me. The relevant time frame for Mr. Straka was
7 while Dr. Baniriah was at Mayo.

8 So Mayo has a lot to say about scheduling their
9 doctors, even former doctors, for deposition. So she had,
10 Dr. Baniriah had presented this to the Mayo folks, and the
11 silence that both sides have heard for a long time had to
12 do with Mayo. As I now understand it, we have a contact at
13 Mayo. We are in a position to get that deposition
14 scheduled.

15 I think it may take a conference call to get it
16 done, but I think we are at the point where we have broken
17 the log jam.

18 Lewis, Kevin, do I have that right?

19 MR. FITZGERALD: Yes, you do, Ron.

20 MR. GOLDSER: Thank you.

21 MS. VAN STEENBURGH: And, Your Honor, this is
22 Tracy Van Steenburgh. That is exactly what we needed to
23 hear. We brought this up today because we had served a
24 subpoena. Got nothing back. We were having trouble
25 scheduling it, and we had contacted plaintiffs' counsel to

1 ask for their assistance and cooperation, and it sounds
2 like they are moving this ahead so that we can work
3 together to get her deposition now.

4 THE COURT: Okay. Sounds good. Number six?

5 MR. GOLDSER: That's the Phase II discovery that
6 I believe we discussed in the context of the case selection
7 process. I think that's also going to be discussed on the
8 23rd as we get into scheduling issues.

9 MR. DAMES: Your Honor, John Dames again. I'm
10 not certain I see the connection or the need because what
11 we're trying to do with the Phase II cases is commence the
12 discovery that we feel we need, and if we don't get it
13 done, there will be such a backlog considering the cases
14 that are in the pipeline that we would like to at least do
15 focused discovery on the Phase II cases, much the same way
16 as we were quite focused in the Phase I cases.

17 We cut back significant amounts of discovery in
18 the Phase I cases in order to provide us with the amounts
19 we need to identify the cases we wanted to select as
20 bellwethers. So we reached an accommodation, and we
21 limited our deposition taking quite dramatically in order
22 to get that accomplished.

23 We think the same should be done in Phase II
24 cases, otherwise it will become totally unmanageable down
25 the road.

1 MR. SAUL: Your Honor, Lewis Saul. And our
2 position is that we should concentrate our efforts, both
3 plaintiffs and defendants, on these bellwether plaintiffs.
4 I have jotted down a few numbers here, and it looks like
5 for each bellwether plaintiff, there will be probably four
6 sales reps and two, three, four doctors.

7 So if there were seven, if there were seven
8 depositions per bellwether and there were, say, nine
9 bellwethers, that would be 63 depositions. Plus there is
10 approximately 14 experts, two days of depositions each.
11 That's, well, I think there is more than 14, but I came up
12 with 36 days of deposition.

13 So in adding them up, that's 100 days of
14 deposition in addition to all the other work that we would
15 have -- that we have to do to get these bellwethers
16 organized. What happened in Phase I cases, as you'll
17 recall, the defendant wanted us to do Phase I discovery of
18 nonMinnesota plaintiffs.

19 So we were flying all over the country and taking
20 doctors' depositions and plaintiffs' depositions, but now
21 at the bellwether selection process, they have said no, we
22 don't want to. We don't want to include those in the
23 bellwether selection. So we really need to focus our
24 efforts now on the bellwether cases and then move on to
25 other cases as we go forward.

1 THE COURT: Okay. Well, I think, I don't see a
2 problem with discussing this on the 23rd. I mean I think
3 we should start mapping this out as we go forward, but I
4 agree that figuring out the details on the bellwether cases
5 here is, come first.

6 So let's return to this subject at least briefly
7 on the 23rd.

8 MR. DAMES: Okay, Your Honor.

9 THE COURT: Anything on number seven? Obviously
10 we have the motion to compel discovery here. Anything else
11 that we need to talk about here?

12 MR. GOLDSER: Judge, Ron Goldser again. I have
13 this on the list so that at the very least we have a record
14 as of this point of the things that from plaintiffs' side
15 that are outstanding and that are important to us to
16 complete so that a lot of other pieces fall into place.

17 You've heard a lot about the motion to
18 consolidate, the motion to select cases for bellwether
19 trials and how scheduling of further Phase I cases and
20 further Phase II cases follows from that. Not terribly
21 dissimilar is the whole notion of the motion to compel
22 discovery. That's a large motion, as Your Honor knows.
23 There are various pieces to it.

24 One of the things that we have found is that with
25 the defendant fact sheets having been answered in the way

1 they were, we've had what we felt were shortcomings in our
2 ability to depose prescribing doctors, and it's really
3 important to us to get good, complete defendant fact sheet
4 information.

5 And so we feel it's very important to get through
6 the order on the motion to compel in order to help us
7 figure out where we're going to go in discovery in some of
8 these other cases, what do we have available to us, how
9 much more information is going to be produced. The Floxin
10 NDA, for example, hamstring our warnings expert to a great
11 extent with the ability to complete her report.

12 So all of these things are now at the point where
13 they're starting to hold us up to be able to be really
14 ready and fully satisfied that we're ready for trial in
15 August. So Your Honor has the motion to compel. We still
16 have the motion dealing with Aventis documents and
17 depositions that's still pending in New Jersey.

18 We've not heard from the court out there, and I
19 just wanted to highlight the fact that our warnings experts
20 on both sides, those reports have not been exchanged yet,
21 primarily because our warnings expert would really much
22 prefer to have the Floxin NDA in hand before she goes
23 forward and issues her report, otherwise she will feel like
24 she's doing a job that is incomplete.

25 So these are record items, but you can see how

1 from our perspective we're getting a little bit stymied in
2 meeting some of the deadlines that are on the scheduling
3 order. We want to meet those deadlines. They're there for
4 a reason. We set them for a reason, but we want to do it
5 swiftly, but we also want to do it well, and we want to
6 represent our clients the way they deserve to be
7 represented.

8 MR. DAMES: Can I just ask a question, Your
9 Honor, on the, on this subsection B?

10 THE COURT: Yes.

11 MR. DAMES: We don't know what is going on
12 ourselves. The defendants do not know what is going on
13 with the Aventis motion in New Jersey, and I must admit to
14 some curiosity as to what that is right now and where it
15 stands.

16 MR. GOLDSER: John, there was a subpoena served
17 on Aventis quite some time ago. Aventis moved to quash.
18 We moved to compel. That was heard. The filings were done
19 August 24th. It was deemed submitted September 5th. We're
20 now 60 plus days from that time where the Court has had the
21 motion under advisement.

22 My understanding from my colleagues on the PFC,
23 and I think Troy Giatras may have been involved in this a
24 little bit, was that copies of those materials were given
25 to you, and you were given an opportunity to participate in

1 that motion, but you didn't.

2 That's my understanding, and you can again tell
3 me if I'm wrong.

4 MR. DAMES: No. I'm sorry. I just didn't -- I
5 was not aware of what the procedural posture was of that
6 motion as to whether a ruling was imminent or what, Ron.

7 MR. GOLDSER: It's as imminent as it can be.
8 It's been under advisement for 60 days.

9 MR. DAMES: Okay.

10 MR. GOLDSER: What that means for that particular
11 court, I don't know, John.

12 MR. DAMES: Okay.

13 THE COURT: Okay. Anything else we should go
14 over today?

15 MR. GOLDSER: Not from plaintiffs' perspective,
16 Your Honor.

17 MR. DAMES: No, Your Honor. I believe that's it.

18 THE COURT: Okay.

19 MR. DAMES: I must admit, Your Honor, I hope the
20 Court found this somewhat useful. The defendants did
21 because I think it's helpful to have a status even though
22 there are things that remain to be resolved. So I
23 apologize if there was any feeling that this was
24 unnecessary.

25 THE COURT: No. I think this is helpful. I do

1 think we need a regular conference, very regular, and I'm
2 happy to do as many of them as we can by telephone, which I
3 know saves a lot of time and cost in moving around, but
4 when we don't have a specific motion to argue or something
5 like that and not a lengthy agenda, it's certainly fine to
6 have a teleconference like this, and I find it very
7 helpful.

8 MR. DAMES: Thank you, Your Honor. We're doing
9 our best to give you as many previews as possible.

10 THE COURT: That's good. I will take a preview
11 anytime. Okay. Well, we will look forward to seeing
12 everyone on the 23rd. That's still on. I think that's
13 going to be a go. I think I can be back in time for that.
14 So we will look forward to seeing everyone on the 23rd.

15 MR. GOLDSER: Thank you, Your Honor.

16 MR. DAMES: Thank you, Your Honor.

17 THE COURT: Okay. Thank you.

18 **(Court was adjourned.)**

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1 I, Kristine Mousseau, certify that the foregoing
2 is a correct transcript from the record of proceedings in
3 the above-entitled matter.
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7 Certified by: s/ Kristine Mousseau, CRR-RPR
8 Kristine Mousseau, CRR-RPR
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