

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re Viagra Products Liability Litigation

Case No. 06-MDL-1724

This Order Relates to All Actions

**ORDER DESIGNATING LEAD  
AND LIAISON COUNSEL**

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**A. Plaintiffs' Lead Counsel**

The Court designates the following co-lead counsel to act on behalf of Plaintiffs:

**Daniel E. Becnel, Jr.**

The Law Offices of Daniel E. Becnel, Jr.  
106 West Seventh Street  
P.O. Drawer H  
Reserve, Louisiana 70084  
dbecnel@becnellaw.com  
Phone: 985.536.1186  
Facsimile: 985.651.6101

**Camilo K. Salas III**

Salas & Co. L.C.  
650 Poydras Street  
Suite 1650  
New Orleans, Louisiana 70130  
csalas@salaslaw.com  
Phone: 504.799.3080  
Fax: 504.799.3085

Plaintiffs' co-lead counsel will be responsible for coordinating the activities of Plaintiffs during pretrial proceedings and will:

1. Determine and present to the Court and opposing parties the position of the Plaintiffs on all matters arising during pretrial proceedings;
2. Initiate and coordinate discovery on behalf of Plaintiffs consistent with the requirements of the Federal Rules of Civil Procedure relating to discovery or any other subsequent order of this Court;
3. Conduct settlement negotiations on behalf of Plaintiffs, but not enter binding agreements except to the extent expressly authorized;

4. Delegate specific tasks to other counsel in a manner to ensure that pretrial preparation for Plaintiffs is conducted effectively, efficiently, and economically;
5. Stipulate with opposing counsel on issues relating to the litigation;
6. Prepare and distribute periodic status reports to the parties;
7. Maintain adequate time and disbursement records covering services of designated counsel and establish guidelines for approval by the Court as to the keeping of time records and expenses;
8. Monitor the activities of co-counsel to ensure that schedules are met and unnecessary expenditures of time and funds are avoided;
9. Perform such other duties as may be incidental to proper coordination of Plaintiffs' pretrial activities or authorized by further Order of the Court; and
10. Submit, if appropriate, additional counsel for designation by the Court.

Counsel for Plaintiffs who disagree with co-lead counsel or who have individual or divergent positions may present written and oral arguments, and otherwise act separately on behalf of their client(s) as appropriate, provided that in doing so they do not repeat arguments, questions, or actions of the co-lead counsel.

**B. Plaintiffs' Liaison Counsel**

The Court designates the following counsel as Plaintiffs' liaison counsel:

**Ronald S. Goldser**

Zimmerman Reed  
651 Nicollet Mall  
Suite 501  
Minneapolis, Minnesota 55402-4123  
rsg@zimmreed.com  
Phone: 612.341.0400  
Facsimile: 612.341.0844

**Randy Hopper**

Zimmerman Reed  
651 Nicollet Mall  
Suite 501  
Minneapolis, Minnesota 55402-4123  
rrh@zimmreed.com  
Phone: 612.341.0400  
Facsimile: 612.341.0844

Plaintiffs' liaison counsel will be responsible for the following activities:

1. Maintain and distribute to co-counsel and to Defendants' liaison counsel an up-to-date service list;
2. Receive and distribute to co-counsel Orders from the Court and documents from opposing parties and counsel;
3. Maintain and make available to co-counsel and other Plaintiffs' counsel at reasonable hours a complete file of all documents served by or upon each party;  
and
4. Establish and maintain an electronically accessible document depository no later than May 31, 2006.

**C. Designation of Defendants' Lead Counsel**

To act on behalf of Defendant, the Court designates the following lead counsel:

**Steven Glickstein**  
Kaye Scholer LLP  
425 Park Avenue  
New York, New York 10022  
sglickstein@kayescholer.com  
Phone: 212.836.8000  
Facsimile: 212.836.8689

**Lori B. Leskin**  
Kaye Scholer LLP  
425 Park Avenue  
New York, New York 10022  
lleskin@kayescholer.com  
Phone: 212.836.8000  
Facsimile: 212.836.8689

**D. Defendant's Liaison Counsel**

The Court designates the following counsel as Defendant's liaison counsel:

**William P. Studer**  
Oppenheimer Wolff & Donnelly LLP  
3300 Plaza VII Building  
45 South Seventh Street  
Minneapolis, Minnesota 55402  
wstuder@oppenheimer.com  
Phone: 612.607.7000  
Facsimile: 612.607.7100

**David P. Graham**  
Oppenheimer Wolff & Donnelly LLP  
3300 Plaza VII Building  
45 South Seventh Street  
Minneapolis, Minnesota 55402  
dgraham@oppenheimer.com  
Phone: 612.607.7000  
Facsimile: 612.607.7100

**IT IS SO ORDERED.**

Dated: May 1, 2006

s/ Paul A. Magnuson  
Paul A. Magnuson  
United States District Court Judge