

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re: STRYKER REJUVENATE AND  
ABG II HIP IMPLANT PRODUCTS  
LIABILITY LITIGATION

MDL No. 13-2441 (DWF/FLN)

**PRETRIAL ORDER NO. 11**

This Document Relates to All Actions

In the interests of efficiency and judicial economy, and to safeguard personally identifiable and protected health information as required under HIPAA, Defendants have agreed to accept service via secure e-mail as set forth below for Plaintiffs' Preliminary Disclosures and Fact Sheets in actions filed in or transferred to MDL No. 13-2441 (DWF/FLN), as required by Pretrial Order No. 8. Based thereon, **IT IS HEREBY ORDERED** that:

1. Plaintiffs must serve Defendants by electronically serving their Preliminary Disclosures and Fact Sheets upon counsel for Defendants, Sedgwick LLP, via secure e-mail, as follows:

a. Plaintiffs must e-mail encrypted/password-protected PDFs of their Preliminary Disclosures to **REJABG\_Disclosures@sedgwicklaw.com**. The password for the file should be sent in a separate e-mail to **REJABG\_Disclosures@sedgwicklaw.com**. Under no circumstances

should the password be sent in the same e-mail with the encrypted/password protected PDF.

b. Plaintiffs must e-mail encrypted/password-protected PDFs of their Fact Sheets to **REJABG\_PFS@sedgwicklaw.com**. The password for the file should be sent in a separate e-mail to **REJABG\_Disclosures@sedgwicklaw.com**. Under no circumstances should the password be sent in the same e-mail with the encrypted/password protected PDF.

c. Counsel for Plaintiffs are urged to use the Client Portal provided on the MDL Plaintiffs' Counsel-only website ([www.stryker-mdl.com](http://www.stryker-mdl.com)) for the submission of both Preliminary Disclosure Forms and Plaintiff Fact Sheets. When submitted via the Client Portal, Plaintiffs' Liaison Counsel to the District Court assumes responsibility for electronic service of the Preliminary Disclosure Forms and Plaintiff Fact Sheets as described above, and the submitting Plaintiff's counsel has no further obligation with respect to service.

d. In the event that a Plaintiff's counsel does not utilize the Client Portal to submit both the Preliminary Disclosure Form and Plaintiff Fact Sheet, a courtesy hard copy of both documents must be provided to Plaintiffs' Liaison Counsel at:

Anthony J. Nemo  
Meshbesh & Spence, Ltd.  
1616 Park Avenue  
Minneapolis, MN 55404

2. The Sedgwick LLP mail system will generate an automated response to the sender upon receipt of an e-mail to these designated addresses. This automated response will confirm receipt of the e-mail, and shall constitute proof of service to the extent the proper documents have been included with the e-mail. The automated response shall not contain any personally identifiable and protected health information.

3. Defendants will not otherwise respond to the above-described e-mails and/or any inquiries or requests for confirmation of receipt. Specific questions or issues should be directed to Defendants' Lead Counsel, to the attention of Karen Woodward (karen.woodward@sedgwicklaw.com) at Sedgwick LLP.

Dated: February 25, 2014

s/Donovan W. Frank  
DONOVAN W. FRANK  
United States District Judge