

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: FLUOROQUINOLONE PRODUCTS LIABILITY LITIGATION	MDL No. 2642
This Document Relates to All Cases	Master Docket Case No. 0:15-md-02642 Hon. Judge John R. Tunheim

**PROPOSED JOINT AGENDA
FOR THE MARCH 28, 2017 CASE MANAGEMENT CONFERENCE**

The Court has set the next Status Conference for this MDL on March 28, 2017 at 2:00 p.m. The PSC and the Bayer Defendants have conferred and hereby submit the following proposed agenda:

- I. Status of litigation:
 - a. Federal and state court filing update; and
 - b. Update on Philadelphia state court peripheral neuropathy litigation and potential bellwether proposal
- II. Update on plaintiff fact sheet deficiencies and Order to Show Cause
- III. Status of meet and confer discussions regarding service of Bayer Pharma AG
- IV. Status of written discovery served on Plaintiffs/PSC
- V. Proposed briefing schedule for ESI dispute
- VI. Status of Bayer Defendant depositions

- VII. Update on bellwether discovery, including dispute regarding deposition protocol
- VIII. Scheduling of April and May conferences

Dated: March 27, 2017

Respectfully submitted,

s/ Bill Robins III

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