

**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 AUGUST 10, 2017 CASE MANAGEMENT CONFERENCE**

The Court has set the next Status Conference for this MDL on August 10, 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 filing update; and
  - b. Philadelphia state court peripheral neuropathy litigation
- II. Update on PFS/SFC deficiencies
- III. Discovery update
  - a. Document production
  - b. Bayer/Merck depositions
  - c. Treater depositions
  - d. Sales representatives
- IV. Plaintiffs' motion to limit treater depositions
- V. Plaintiffs' motion to amend protective order

- VI. Agreed order regarding common benefit account
- VII. Scheduling of September status conference

Dated: August 9, 2017

Respectfully submitted,

s/ Bill Robins III

Bill Robins III  
**ROBINS CLOUD LLP**  
404 Wilshire Blvd., Suite 450  
Santa Monica, CA 90401  
Tel: (310) 929-4200  
Fax: (310) 566-5900  
robins@robinscloud.com

*Plaintiffs' Counsel*

Russell Budd  
**BARON & BUDD, PC**  
3102 Oak Lawn Ave Suite 1100  
Dallas, TX 75219  
Tel: (214) 521-3605  
Fax: (214) 520-1181  
[rbudd@baronbudd.com](mailto:rbudd@baronbudd.com)

*Plaintiffs' Counsel*

Yvonne M. Flaherty  
**LOCKRIDGE, GRINDAL, NAUEN, P.L.L.P.**  
100 Washington Avenue South, Suite 2200  
Minneapolis, MN 55401  
Tel: 612-339-6900  
Fax: 612-339-0981  
ymflaherty@locklaw.com

*Plaintiffs' Counsel*

Arthur E. Brown  
Lori B. Leskin  
Andrew K. Solow  
**KAYE SCHOLER LLP**  
250 West 55<sup>th</sup> Street  
New York, NY 10019  
Tel: (212) 836-8000  
Fax: (212) 836-8689  
[Arthur.Brown@kayescholer.com](mailto:Arthur.Brown@kayescholer.com)  
[Lori.Leskin@kayescholer.com](mailto:Lori.Leskin@kayescholer.com)  
[Andrew.Solow@kayescholer.com](mailto:Andrew.Solow@kayescholer.com)

*Attorneys for Defendants Bayer Corporation, Bayer HealthCare Pharmaceuticals Inc., and Merck & Co., Inc.*

Joseph M. Price  
Cicely R. Miltich  
**FAEGRE BAKER DANIELS LLP**  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis MN 55402-3901  
Tel: (612) 766-8617  
Fax: (612) 766-1600  
[Joseph.Price@faegrebd.com](mailto:Joseph.Price@faegrebd.com)  
[Cicely.Miltich@faegrebd.com](mailto:Cicely.Miltich@faegrebd.com)

*Attorneys for Bayer Corporation, Bayer HealthCare Pharmaceuticals Inc., and Merck & Co., Inc.*