

**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 OCTOBER 10, 2017 CASE MANAGEMENT CONFERENCE**

The Court has set the next Status Conference for this MDL on October 10, 2017 at 4:00 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. Discovery update
 - a. Document production
 - b. Bayer/Merck depositions
 - c. Treater depositions
 - d. Sales representatives
- III. Parties' proposed order to amend PTO 13
- IV. Scheduling of November status conference

Dated: October 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

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 55th Street
New York, NY 10019
Tel: (212) 836-8000
Fax: (212) 836-8689
Arthur.Brown@kayescholer.com
Lori.Leskin@kayescholer.com
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
Cicely.Miltich@faegrebd.com

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