

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**In Re: TAXOTERE (DOCETAXEL)
PRODUCTS LIABILITY
LITIGATION**

**MDL NO. 2740
SECTION “N” (5)**

**THIS DOCUMENT RELATES TO:
ALL CASES**

**JOINT REPORT NO. 6 OF LIAISON COUNSEL
(Status Conference, October 27, 2017)**

NOW INTO COURT come Plaintiffs’ Co-Liaison Counsel (“PLC”) and Defendants’ Liaison Counsel (“DLC”), who respectfully submit this Joint Report No. 6 of Liaison Counsel.

1. REPORT OF CLAIMS AND CASE INVENTORY

On October 4, 2016, the Judicial Panel on Multidistrict Litigation (“JPML”) transferred 28 civil action(s) to the United States District Court for the Eastern District of Louisiana for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. *See In re Taxotere (Docetaxel) Prod. Liab. Litig.*, No. MDL 2740, 2016 WL 5845996 (U.S. Jud. Pan. Mult. Lit. Oct. 4, 2016). Since that time, excluding voluntary dismissals, additional actions have been transferred to the Eastern District of Louisiana pursuant to Conditional Transfer Orders of the JPML. As of October 25, 2017, excluding voluntary dismissals, there are 3,040 cases pending in the MDL before the Honorable Kurt D. Engelhardt.

2. FEDERAL/STATE COORDINATION

Related state court proceedings have been filed in California, Missouri, and Delaware. Most of these state court proceedings were removed to federal court. The Court ruled on remand motions on August 30, 2017. (Rec. Doc. 781). The Court received supplemental briefing on

whether two California multi-plaintiff cases could be severed prior to remand and that issue remains pending before the Court.

The parties continue to coordinate and communicate with all counsel and advise them of the status conference call in number (listen only). The parties also continue to make efforts to identify and alert the relevant state court judge(s) of the MDL and the Court's willingness to cooperate with the state court judges for the purposes of coordinating discovery and other pretrial proceedings and to provide the call-in number for the status conferences, should they wish to join.

3. PRETRIAL ORDERS

A listing of all Pretrial Orders is attached to this Joint Report as Appendix A.6.

The Court has issued the following important Pretrial Orders (sometimes "PTO") since the September 8, 2017 Status Conference:

- a. **Pretrial Order No. 59** (Rec. Doc. 816) entered September 7, 2017 ordering that the submission date on Defendants Sanofi-Aventis U.S. LLC and Sanofi US Services Inc.'s Motion to Dismiss Claims Barred by the Applicable Statutes of Limitations (Rec. Doc. 494) be continued until Wednesday, November 8, 2017.
- b. **Pretrial Order No. 60**, (Rec. Doc. 819) entered September 7, 2017 ordering the collection of data of potential claimants by the Plaintiffs' Settlement Committee.
- c. **Pretrial Order No. 60A** (Rec. Doc. 870) entered September 15, 2017 amending and superseding Pretrial Order No. 60 (Rec. Doc. 819) and ordering the collection of data of potential claimants by the Plaintiffs' Settlement Committee.
- d. **Pretrial Order No. 61** (Rec. Doc. 877) entered September 27, 2017 dismissing Counts Two and Eight of Plaintiffs' First Amended Master Long Form Complaint and granting individual Plaintiffs fourteen (14) days to amend their Short Form Complaint to allege analogous state law claims that may be viable on an individual basis.
- e. **Pretrial Order No. 62** (Rec. Doc. 878) entered September 27, 2017, ordering that the Master Answer deadline for each Defendant is Monday, October 16, 2017.
- f. **Pretrial Order No. 63** (Rec. Doc. 879) entered September 27, 2017, setting the next meeting of liaison counsel for Friday, October 6, 2017, at 9:30 a.m.

- g. **Pretrial Order No. 64** (Rec. Doc. 941) entered October 12, 2017 clarifying the Court's ruling on Plaintiffs' Motion to Remand (Rec. Doc. 469).
- h. **Pretrial Order No. 65** (Rec. Doc. 959) entered on October 16, 2017 setting the procedure for severance of multi-plaintiff cases.
- i. **Pretrial Order No. 66** (Rec. Doc. 1018) entered October 25, 2017- Order Clarifying this Court's Ruling on Delaware Motion To Remand (Rec. Doc. 784).
- j. **Pretrial Order No. 67** (Rec. Doc. 1032) entered October 27, 2017 – Order setting the next liaison counsel meeting for November 17, 2017, at 9:30 AM, and setting the next General Status Conference for December 15, 2017, at 10:00 AM.

4. **CASE MANAGEMENT ORDERS**

A listing of all Case Management Orders is attached to this Joint Report as Appendix B.6.

The Court has issued the following Case Management Orders since the July 7, 2017

Status Conference:

- a. **Case Management Order No. 7** (Rec Doc. 915) entered October 10, 2017 establishing the general discovery protocol applicable to the 505(b)(2) Defendants.
- b. **Case Management Order No. 8** (Rec. Doc. 935) entered on October 11, 2017 setting the trial scheduling order for the second bellwether trial.

The parties will meet and confer and submit Case Management Orders for the third, fourth and fifth trial dates in 2019.

5. **COUNSEL CONTACT INFORMATION FORM**

All counsel in the MDL are required to complete the Counsel Contact Information Form (available as a fillable PDF on the Court's MDL 2740 website) attached to PTO No. 7 (Rec. Doc. 155), and forward it to Plaintiffs' Co-Liaison Counsel at dwhite@bkc-law.com. This information must be kept current by each counsel and will be relied upon throughout the litigation. Co-Liaison Counsel provides a copy of all Counsel Contact Forms to Jacob Woody at BrownGreer.

BrownGreer will rely on the information included in the Counsel Contact Form to serve all pleadings.

6. MASTER COMPLAINT AND SHORT FORM COMPLAINT

The Master Long Form Complaint was filed on March 31, 2017. (Rec. Doc. 312). PTO 41 (Rec. Doc 331) provides the Court-approved amended Exemplar Short Form Complaint, which supersedes PTO 37 (Rec. Doc. 318). Some counsel have continued to serve Short Form Complaints using the obsolete, original form. Counsel should use the Court-approved, amended Short Form Complaint. Counsel are advised to make reference to the Master Long Form Complaint when completing the Short Form Complaint.

Due to issues with the proper names of some Defendants, the parties filed a Stipulation Concerning Amendments to Plaintiffs' Master Long Form Complaint, Exemplar Short Form Complaint and Plaintiff Fact Sheet (Rec. Doc. 642), which the Court adopted in PTO 55. (Rec. Doc. 688). Plaintiffs filed their First Amended Master Long Form Complaint and Demand for Jury Trial (Rec. Doc. 689) pursuant to PTO 55 (Rec. Doc. 688).

Plaintiffs' counsel need not file any amending complaint or amending Plaintiffs' Fact Sheet in order to effectuate the aforementioned naming corrections, but they must re-serve Sun Pharmaceuticals, Inc. f/k/a Caraco Laboratories Ltd. PTO No. 53 (Rec. Doc. 664) if service was previously effectuated on the improperly named Sun Pharma entity.

Additionally, should any Plaintiff's counsel use the Short Form Complaint as an amending complaint, and not include all Defendants named in the original complaint, the Clerk's office will close that Plaintiff's claims against the Defendant(s) who is (are) not named.

If any case was docketed in the MDL prior to April 1, 2017, a Short Form Complaint may be filed as an amended complaint in the Plaintiff's individual case, not in the master MDL docket.

If the case is filed in or transferred to the MDL from April 1, 2017, forward, the Plaintiff must file a Short Form Complaint. The relevant PTOs are PTO No. 15 (Rec. Doc. 230), PTO No. 37 (Rec. Doc. 318), and PTO 41 (Rec. Doc. 331).

Should any Plaintiff wish to file an Amended Complaint, the Court's Local Rule 7.6¹ requires that before filing any motion to amend pleadings, the Plaintiff must attempt to obtain the consent for the filing and granting of the motion from all parties having an interest to oppose. Plaintiffs' counsel must email each request² for consent to Co-Defendants' Liaison Counsel, Douglas Moore, dmoore@irwinllc.com, and John Olinde, Olinde@chaffe.com, who will forward the request to the appropriate attorneys for a response. If consent is obtained, the motion need not be assigned a submission date, but must be accompanied by a proposed order and include a certification by counsel for Plaintiff of the consent of opposing counsel. If consent is not granted, the motion for leave to amend the pleadings must be filed as an opposed motion.

Moreover, attention must be paid to amendments entailing voluntary dismissal of the entire case. Under PTO 54 (Rec. Doc. 671), entered on July 21, 2017, Plaintiffs cannot "notice" a voluntary dismissal of all Defendants without prejudice. They must either move to dismiss, get stipulation to dismiss, or dismiss with prejudice. In any case, several procedural requirements must also be met and counsel should review the requirements of PTO 54. All voluntary dismissals without prejudice that would result in the dismissal of an entire action against all named Defendants require leave of Court by (i) motion or (ii) with stipulation of all served Defendants. With either a motion or stipulation, a Plaintiff must serve a completed Plaintiff Fact Sheet and accompanying disclosures. In addition, with a motion, the Plaintiff must provide 14 days prior

¹ http://www.laed.uscourts.gov/sites/default/files/local_rules/LAEDLocalCivilRules_4.pdf

² The request should include the proposed motion, order and amending pleading, as well as documentation supporting product identification (if available).

written notice to PLC and DLC and include a certification indicating either: (1) Defendants' consent or no intended opposition to the motion, or (2) that the motion is opposed and the grounds for such opposition.

7. PLAINTIFF AND DEFENDANT FACT SHEETS

Counsel should note the rules of the Plaintiff Fact Sheets ("PFS") in several Pretrial Orders:

- a. Amended PTO 22 (Rec. Doc. 325) sets forth service of PFSs and Defendant Fact Sheets ("DFS");
- b. PTO 23 (Rec. Doc. 280) amends Exhibit A which are the authorizations to PFS (Rec. Doc. 280);
- c. PTO 24 (Rec. Doc. 279) provides additional details on the service of fact sheets and authorizations through MDL Centrality and the PLC Distribution of Orders and Notices per PTO 1; and
- d. PTO 55 (Rec. Doc. 688) grants the filing of an Amended PFS. See Rec. Doc. 236-1.

Amended PTO 22 (Rec. Doc. 325) provides the timeframe for service of completed PFS and DFS forms; however, the Court has determined that the term "date of this order" in the Orders refers to the date of the initial PTO 22 (i.e., March 10, 2017). The timeframe for service of completed PFS and DFS is shortened for the ten Trial Plaintiffs. CMO No. 4 (Rec. Doc. 670).

As October 25, 2017, Plaintiffs have served 1,409 PFSs, and 636 PFSs are in progress. Based on the PFSs received as of October 25, 2017, they divide among Defendants as follows: 719 sanofi, 99 Hospira, 30 Sandoz, 23 Accord, 275 Unknown, 101 Blank, 162 Other/Miscellaneous. The parties continue to confer on the status of photographic evidence submitted with fact sheets with Plaintiffs' Liaison Counsel advising all Plaintiffs' counsel of the Court's statements on this issue, the descriptions of Plaintiffs' injuries in the Short Form complaints, the Deficiency Notices issued, and the status of product identification in multi-defendant cases. Many PFSs were due under the provisions of Amended PTO 22 (Rec. Doc. 325) September 22, 2017.

Under Amended PTO 22 ¶ 5, sanofi identifies the approximately 117 cases attached hereto as Appendix C.6 as matters where no PFS, authorizations, or responsive documents have been submitted in violation of the Order. Sanofi accordingly requests that the Court issue a show cause order with notice pursuant to Amended PTO 22. *Id.*

Subject to the same provisions, Sanofi identifies the approximately five cases attached hereto as Appendix D.6 where Defendants issued deficiency notices on Plaintiffs' PFSs and Plaintiffs have failed to respond in any manner for thirty (30) days or more. Sanofi accordingly requests that the Court issue a show cause order with notice pursuant to Amended PTO 22. *Id.*

Subject to the same provisions, Sanofi also identifies the approximately 18 cases attached hereto as Appendix E.6 where Plaintiffs have failed to cure deficiencies related to the three categories of information needed to make the PFSs "substantially complete" as defined in Amended PTO 22. Sanofi accordingly requests that the Court issue a show cause order with notice pursuant to Amended PTO 22.

Under PTO 22 ¶ 5, the 505(b)(2) Defendants identify the approximately 50 cases attached hereto as Appendix F.6 as matters where no PFS, authorizations, or responsive documents have been submitted in violation of the Order. The 505(b)(2) Defendants accordingly request that the Court issue a show cause order with notice pursuant to Amended PTO 22. *Id.*

Subject to the same provisions, the 505(b)(2) Defendants identify the approximately 25 cases attached hereto as Appendix G.6 where the 505(b)(2) Defendants issued deficiency notices on Plaintiffs' PFSs and Plaintiffs have failed to respond in any manner for thirty (30) days or more. The 505(b)(2) Defendants accordingly requests that the Court issue a show cause order with notice pursuant to Amended PTO 22. *Id.*

Subject to the same provisions, the 505(b)(2) Defendants also identify the approximately 77 cases attached hereto as Appendix H.6 where Plaintiffs have failed to cure deficiencies related to the three categories of information needed to make the PFSs “substantially complete” as defined in Amended PTO 22. The 505(b)(2) Defendants accordingly request that the Court issue a show cause order with notice pursuant to Amended PTO 22.

In the Joint Report submitted by liaison counsel in conjunction with the September 8, 2017 status conference, pursuant to Amended PTO 22, sanofi identified cases where either no PFS was submitted, or a noticed deficiency had not been cured. *See* (Rec. Doc. 325). As of October 31, 2017, the approximately five cases identified in Appendix I.6 have still failed to either file a PFS or to remedy the noticed deficiencies. Consequently, Amended PTO 22 requires these Plaintiffs to show cause why their Complaints should not be dismissed with prejudice. Failure to timely comply may result in a dismissal of Plaintiff’s claim.

8. MDL CENTRALITY

Fillable versions of the Plaintiff Fact Sheet and Defense Fact Sheet are on the Court’s website under the tab “Forms,” as well as on the BrownGreer website.

9. SERVICE ON DEFENDANTS

Counsel for sanofi and the Plaintiffs’ Steering Committee (PSC) have agreed to a streamlined service procedure set forth in PTO 9 (Rec. Doc. 160) for service of complaints on the domestic sanofi entity. As a result of PTO 9, Plaintiffs are not required to effectuate service on the foreign sanofi entities unless otherwise ordered by the Court.

Counsel for several Defendants have also agreed to streamlined service procedures: for Accord Healthcare, Inc., a streamlined service procedure is in PTO 29 (Rec. Doc. 303); for Sandoz Inc. in PTO 30 (Rec. Doc. 304); for Actavis Pharma, Inc. in PTO 32A (Rec. Doc. 710); for

McKesson Corporation in PTO 33 (Rec. Doc. 308); for Sun Pharma, Inc. in PTO 39A (Rec. Doc. 711); and for Hospira Worldwide, LLC in PTO 40A (Rec. Doc. 509) that amends and supersedes PTO 40 (Rec. Doc. 328).

10. DISMISSAL OF DEFENDANTS

Three entities, who were originally named as Defendants, have been dismissed in all cases pending in the MDL. One entity (Apotex, Inc.) submitted proof by affidavit that it did not manufacture Docetaxel. The other entities, Northstar RX, LLC and Eagle Pharmaceuticals, Inc., submitted proof that they did not manufacture Docetaxel until after the date of infusions alleged in the individual Complaints. The referenced documents are as follows: Northstar RX LLC (Rec. Docs. 320, 324, 333, 335), Eagle Pharmaceuticals, Inc. (Rec. Doc. 319, 332, 336), and Apotex, Inc. (Rec. Docs. 219, 224, 225).

The Defendants have communicated with Plaintiffs and Plaintiffs' Liaison Counsel seeking dismissal in cases where (i) a Plaintiff's PFS identified a different manufacturer of Taxotere/docetaxel, (ii) Plaintiffs' records reflect treatment only with Taxotere/docetaxel manufactured by a different Defendant, and/or (iii) Plaintiffs' records indicate treatment dates prior to the availability of the Defendant's product on the market. Plaintiffs and Defendants are meeting and conferring regarding these requests for dismissal. The PSC and all Defendants agree to make a concerted effort to ensure that only the proper Defendants are named. The PSC and all Defendants are meeting and conferring on a proposed PTO to ensure that the proper Defendant manufacturers are named in a complaint once the Plaintiff attorney receives or obtains information that identifies the product used by the Plaintiff. The parties are prepared to discuss this issue at the status conference.

11. PRESERVATION ORDER

Counsel are reminded to familiarize themselves with the terms of PTO 1 (Rec. Doc. 4, ¶12) regarding preservation of evidence. The parties will meet and confer if it becomes appropriate to modify, amend or supplement PTO No. 1 regarding Preservation Order. (Rec. Doc. No. 4). Pursuant to negotiations with the U.S. sanofi Defendants, Plaintiffs' Liaison Counsel circulated an additional letter on preservation to all Plaintiffs' counsel known at the time.

12. PROTECTIVE ORDER

Magistrate Judge North entered the Protective Order on July 5, 2017, as PTO 50 (Rec. Docs. 612-1, 613).

13. ELECTRONICALLY STORED INFORMATION (ESI) DISCOVERY

Magistrate Judge North entered the Electronically Stored Information Protocol on July 5, 2017 as PTO 49 (Rec. Docs. 611-1, 613).

14. DISCOVERY OF DEFENDANTS

Plaintiffs have served jurisdictional discovery and foreign merits discovery and the Sanofi Defendants have responded. This discovery now is moot, as Plaintiffs and the Sanofi Defendants have reached an agreement to resolve the French sanofi motion to dismiss for lack of jurisdiction (Rec. Doc. 346), French sanofi motion for protective order (Rec. Doc. 542), Plaintiffs' motion to compel jurisdictional discovery (Rec. Doc. 626), and sanofi's motion for disclosure of non-party interested entities or persons (Rec. Doc. 559). Plaintiffs and Sanofi intend to submit a stipulation to the Court this week that sets forth the terms of this agreement.

Plaintiffs have served merits discovery on Sanofi, and the Sanofi Defendants have begun the process of producing responsive documents. The parties have met and conferred multiple

times about this discovery served by the Plaintiffs. The parties are generally addressing discovery disputes with Magistrate Judge North.

15. MOTION PRACTICE

- a. On May 26, 2017, sanofi filed a Motion to Dismiss Claims Barred by the Applicable Statutes of Limitations. (Rec. Doc. 494). Plaintiffs opposed that motion on July 20, 2017. (Rec. Doc. 663). Sanofi replied in support of the motion on August 25, 2017. (Rec. Doc. 771). The Court denied the Motion without Prejudice on October 26, 2017. (Rec. Doc. No. 1034).
- b. On October 3, 2017, Defendants filed a Motion for the entry of a case substitution protocol (Rec. Doc. 888). Plaintiffs opposed this Motion on October 17, 2017. (Rec. Doc. 975). Defendants submitted a reply memorandum on October 20, 2017, which was subsequently entered into the docket on October 27, 2017. (Rec. Doc 1027).
- c. On October 5, 2017, sanofi filed a Motion to permit written discovery on the Trial Pool Plaintiffs. (Rec. Doc. 905). Plaintiffs opposed that motion on October 20, 2017. (Rec. Doc. 1002). Sanofi filed a reply memorandum on October 23, 2017. (Rec. Doc. 1007).
- d. On October 10, 2017, sanofi filed a Motion for entry of a physician contact protocol. (Rec. Doc. 917). Plaintiffs opposed this Motion on October 17, 2017. (Rec. Doc. 976). Sanofi submitted a reply memorandum on October 20, 2017, which was subsequently entered into the docket on October 27, 2017. (Rec. Doc. 1029).
- e. On October 10, 2017, sanofi filed a Motion to compel electronically stored information. (Rec. Doc. 918). Plaintiffs opposed this Motion on October 17, 2017. (Rec. Doc. 977). Sanofi submitted a reply memorandum on October 20, 2017. (Rec. Doc. 1001). This

motion was set for oral argument before Magistrate Judge North on October 26, 2017, and, on the same date, was withdrawn by counsel for sanofi.

16. CLASS CERTIFICATION BRIEFING

Class Certification of a putative Louisiana class of Plaintiffs was denied by the Court on July 17, 2017. (Rec. Doc. 647).

17. SETTLEMENT COMMITTEES

Pursuant to PTO 6 (Rec. Doc. 133), the Court appointed representatives to a Plaintiff's Settlement Committee and to a sanofi Settlement Committee. Settlement Committees are tasked with maintaining a continuing, collaborative discussion of the elements and characteristics of a framework for potential resolution of cases. Pursuant to PTO 44 (Rec. Doc. 371), the Court appointed a separate Settlement Committee for the non-sanofi Defendants, referred to as the 505(b)(2) Defendants. The chairpersons for each Settlement Committee recently met in person to discuss relevant issues and a process for identifying unfiled cases.

18. SPECIAL MASTER FOR PLAINTIFFS' TIME AND EXPENSES

In PTO 20 (Rec. Doc. 265) the Court appointed Kenneth W. DeJean as Special Master for the Plaintiffs to review the time and expenses submitted as common benefit during the course of the MDL. The Special Master is working in the time and expense reporting system, having begun his first review of the time and expenses submitted.

19. NEXT STATUS CONFERENCE

The Court has announced that the next general status conference will be held on December 15, 2017, at 10:00 a.m. in Judge Engelhardt's courtroom, with the meeting of Liaison Counsel at 8:30 a.m. in Chambers, and the meeting of the PSC and the defendants' Lead Counsel at 9 a.m. The Court has set up a telephone conference line for the status conference that begins at 10:00 a.m.

To join the status conference by telephone at 10:00 a.m., please use the call-in information on the Court's website under the tab "Upcoming Events."

Dated: November 1, 2017

Respectfully submitted:

/s/Dawn M. Barrios

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Defendants' Liaison Counsel

CERTIFICATE OF SERVICE

I hereby certify that on November 1, 2017, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record who are CM/ECF participants.

/s/ Douglas J. Moore

APPENDIX A.6

PRETRIAL ORDERS

Pretrial Order No. 1 (Rec. Doc. 4) entered October 13, 2016 – Setting initial conference.

Pretrial Order No. 2 (Rec. Doc. 104) entered November 17, 2016 – Appointing Plaintiffs’ Liaison Counsel, Plaintiffs’ Steering Committee, and Defendants’ Liaison Counsel.

Pretrial Order No. 3 (Rec. Doc. 115) entered November 30, 2016 – Filing Requests for Summons and Summons Returns.

Pretrial Order No. 4 (Rec. Doc. 122) entered December 9, 2016 – Procedures for Direct Filing into the MDL [**superseded by PTO 5**].

Pretrial Order No. 5 (Rec. Doc. 131) entered December 13, 2016 – Amended Procedures for Direct Filing into the MDL.

Pretrial Order No. 6 (Rec. Doc. 133) entered December 13, 2016 – Appointing Settlement Committees.

Pretrial Order No. 7 (Rec. Doc. 155) entered December 28, 2016 – Approving and attaching Counsel Contact Information Form.

Pretrial Order No. 8 (Rec. Doc. 156) entered December 30, 2016 – Federal-State Coordination and Cooperation.

Pretrial Order No. 9 (Rec. Doc. 160) entered January 3, 2017 – Streamlined Service on sanofi-Aventis U.S. LLC.

Pretrial Order No. 10 (Rec. Doc. 169) entered January 11, 2017 – JPML Clarification on Scope of MDL.

Pretrial Order No. 11 (Rec. Doc. 170) entered January 11, 2017 – Extending Deadline to Submit Proposed PFS and DFS.

Pretrial Order No. 12 (Rec. Doc. 191) entered January 20, 2017 – Directing that Service of Process shall be made on all known, non-sanofi Defendants by February 15, 2017; Directing Liaison Counsel to Provide Proposed Deadlines for Close of Pleadings.

Pretrial Order No. 13 (Rec. Doc. 209) entered January 31, 2017 – Appointing Brian S. Rudick to the Settlement Committee.

Pretrial Order No. 14 (Rec. Doc. 216) entered February 3, 2017 – Order from January 27, 2017 Status Conference.

Pretrial Order No. 15 (Rec. Doc. 230) entered February 10, 2017 – Order setting deadlines for Master and Short Form Complaint, Motions to Dismiss and Master Answer.

Pretrial Order No. 16 (Rec. Doc. 234) entered February 13, 2017 – Intention to Enter Common Benefit, Time and Expense Rules, Appointment of CPA, Holdback, Assessments, and Related Issues.

Pretrial Order No. 17 (Rec. Doc. 235) entered February 13, 2017 – Intention to Appoint Kenneth W. DeJean as Special Master.

Pretrial Order No. 18 (Rec. Doc. 236) entered February 14, 2017 – Ordering the use of the attached Plaintiff Fact Sheets and Defense Fact Sheets. See also R.Doc. 236-1.

Pretrial Order No. 19 (Rec. Doc. 262) entered February 23, 2017 – Adopting the proposed Common Benefit Order submitted by Liaison Counsel and the Plaintiffs' Steering Committee.

Pretrial Order No. 20 (Rec. Doc. 265) entered February 24, 2017 – Appointing Kenneth W. DeJean as Special Master.

Pretrial Order No. 21 (Rec. Doc. 276) entered March 7, 2017 – Setting Deadlines following March 6, 2017 meeting with liaison counsel.

Pretrial Order No. 22 (Rec. Doc. 279) entered March 10, 2017 – Implementation of Deadlines for Service of Fact Sheets and Deficiencies.

Pretrial Order No. 23 (Rec. Doc. 280) entered March 10, 2017 – Amending Exhibit A to Pretrial Order No. 18 (R. Doc. 236-1) to include the authorizations approved by the Court.

Pretrial Order No. 24 (R. Doc. 286) entered March 16, 2017 – Guidelines for service of Fact Sheets through MDL Centrality and Plaintiff Liaison Counsel Distribution of Orders and Notices per Pretrial Order No. 1.

Pretrial Order No. 25 (R. Doc. 287) entered March 16, 2017 – Appointing John F. Olinde to serve as Liaison Counsel for the non-Sanofi defendants.

Pretrial Order No. 26 (Rec. Doc. 289) entered March 17, 2017 – Designating Defense Counsel to Attend Plaintiffs' Steering Committee Meetings

Pretrial Order No. 26A (Rec. Doc. 598) entered June 28, 2017 – Modification to Designation of Defense Counsel to Attend Plaintiffs' Steering Committee Meetings

Pretrial Order No. 27 (Rec. Doc. 298) entered March 24, 2017 – Order from March 17, 2017 Status Conference

Pretrial Order No. 28 (Rec. Doc. 302) entered March 27, 2017 – Setting a Meeting with Liaison Counsel

Pretrial Order No. 29 (Rec. Doc. 303) entered March 27, 2017 – Streamlined Service on Accord Healthcare, Inc.

Pretrial Order No. 30 (Rec. Doc. 304) entered March 27, 2017 – Streamlined Service on Sandoz, Inc.

Pretrial Order No. 31 (Rec. Doc. 305) entered March 27, 2017 – Amended Task Codes for Common Benefit Order

Pretrial Order No. 32 (Rec. Doc. 307) entered March 31, 2017 – Streamlined Service on Actavis Pharma, Inc.

Pretrial Order No. 33 (Rec. Doc. 308) entered March 31, 2017 – Streamlined Service on McKesson Corporation

Pretrial Order No. 34 (Rec. Doc. 309) entered March 31, 2017 – Extending the Deadline to Submit Proposed Orders for Streamlined Service as to Eagle Pharmaceuticals, Inc. and NorthStar Rx LLC

Pretrial Order No. 35 (Rec. Doc. 310) entered March 31, 2017 – Scheduling Meetings between the Court and the Settlement Committees

Pretrial Order No. 36 (Rec. Doc. 317) entered April 6, 2017 – Withdrawal of Deadline to Submit Proposed Orders Regarding Streamlined Service as to Eagle Pharmaceuticals, Inc. and NorthStar Rx LLC

Pretrial Orders No. 37 and 41 (Rec. Docs. 318 and 331) entered April 6, 2017 and April 17, 2017 – Exemplar Short Form Complaint and superseding and amending Exemplar Short Form Complaint.

Pretrial Order No. 38 (Rec. Doc. 326) entered on April 12, 2017- Amending PFS and DFS

Pretrial Order No. 39 (Rec. Doc. 327) entered on April 11, 2017- Streamlined Service on Sun Pharma Global, Inc.

Pretrial Order No. 40 (Rec. Doc. 328) entered on April 12, 2017- Streamlined Service on Hospira Worldwide, LLC and Pfizer Inc.

Pretrial Order No. 40A (Rec. Doc. 509) entered June 1, 2017 – Amending Pretrial Order No. 40 regarding Streamlined Service on Hospira Worldwide, LLC and Pfizer, Inc.

Pretrial Order No. 42 (Rec. Doc. 348) entered on April 26, 2017- Responsive Pleadings to Short Form Complaints Reserved

Pretrial Order No. 43 (Rec. Doc. 349) entered April 27, 2017- Regarding July 7, 2017 Status Conference, 505(b)(2) Defendant Settlement Committee, “Science Day,” Remand Motions and Discovery Schedule

Pretrial Order No. 44 (Rec. Doc. 371) entered May 11, 2017 – Order Appointing 505(b)(2) Defendants’ Settlement Committee

Pretrial Order No. 45 (Rec. Doc. 458) entered May 12, 2017 – Setting the Briefing Schedule for the Omnibus Motions to Remand

Pretrial Order No. 46 (Rec. Doc. 462) entered May 16, 2017 – Order from May 12, 2017 Status Conference

Pretrial Order No. 47 (Rec. Doc. 534) entered June 13, 2017 – Granting Requests for Oral Argument on Omnibus Motions to Remand

Pretrial Order No. 48 (Rec. Doc. 566) entered June 28, 2017 – Resetting Oral Argument on Omnibus Motions To Remand

Pretrial Order No. 49 (Rec. Docs. 611, 613) entered July 5, 2017 – Electronically Stored Information Protocol

Pretrial Order No. 50 (Rec. Docs. 612, 613) entered July 5, 2017 – Protective Order

Pretrial Order No. 51 (Rec. Doc. 660) entered July 18, 2017- Order from July 7, 2017 Status Conference

Pretrial Order No. 52 (Rec. Doc. 661) entered July 18, 2017- Amended Deadlines Regarding Personal Jurisdiction and Potential Discovery Protocols

Pretrial Order No. 53 (Rec. Doc. 664) entered July 20, 2017- Amendments to Plaintiffs' Master Long Form Complaint, Exemplar Short Form Complaint and Plaintiffs' Fact Sheet

Pretrial Order No. 54 (Rec. Doc. 671) entered July 21, 2017- Docket Control Order- Voluntary Dismissals

Pretrial Order No. 55 (Rec. Doc. 688) entered July 25, 2017- Order Regarding the Filing of the Amended Master Long Form Complaint and Substitution of the Amended Exemplar Short Form Complaint and Amended Plaintiff Fact Sheet

Pretrial Order No. 56 (Rec. Doc. 712) entered August 2, 2017- Issuance of Summons with Corrected Defendants' Names

Pretrial Order No. 57 (Rec. Doc. 718) entered August 3, 2017- Setting a Meeting with Liaison Counsel

Pretrial Order No. 58 (Rec. Doc. 744) entered August 18, 2017- Granting Request for Oral Argument on Defendants' Motion to Dismiss Plaintiffs' Master Long Form Complaint (Rec. Doc. 489)

Pretrial Order No. 59 (Rec. Doc. 816) entered September 7, 2017- Resetting the Submission Date on Defendants' Motion to Dismiss Claims Barred by the Applicable Statutes of Limitations (Rec. Doc. No. 494)

Pretrial Order No. 60 (Rec. Doc. 819) entered September 7, 2017- Ordering Collection of Data of Potential Claimants by the Plaintiffs' Settlement Committee.

Pretrial Order No. 60A (Rec. Doc. 870) entered September 15, 2017- Amending and Superseding Order Regarding Collection of Data of Potential Claimants by the Plaintiffs' Settlement Committee.

Pretrial Order No. 61 (Rec. Doc. 877) entered September 27, 2017- Ordering the Dismissal of Count Two and Count Eight of the Master Long Form Complaint (Rec. Doc. 489).

Pretrial Order No. 62 (Rec. Doc. 878) entered September 27, 2017- Ordering that the deadline for each Defendant to file their Master Answer be set for Monday, October 16, 2017.

Pretrial Order No. 63 (Rec. Doc. 879) entered September 27, 2017- Ordering that the meeting of liaison counsel with the Court take place on Friday, October 6, 2017, at 9:30 a.m.

Pretrial Order No. 64 (Rec. Doc. 941) entered October 13, 2017- Ordering Clarifying the Court's Ruling (Rec. Doc. 784) on California Plaintiffs' Motion to Remand.

Pretrial Order No. 65 (Rec. Doc. 959) entered October 16, 2017- Ordering Severance of Multi-Plaintiff Cases.

Pretrial Order No. 66 (Rec. Doc. 1018) entered October 25, 2017- Order Clarifying this Court's Ruling on Delaware Motion to Remand (Rec. Doc. 784).

Pretrial Order No. 67 (Rec. Doc. 1032) entered October 27, 2017 – Order setting the next liaison counsel meeting for November 17, 2017, at 9:30 AM, and setting the next General Status Conference for December 15, 2017, at 10:00 AM.

APPENDIX B.6

Case Management Orders

Case Management Order No. 1 (Rec. Doc. 465) entered May 18, 2017- Personal Jurisdiction Discovery

Case Management Order No. 2 (Rec. Doc. 474) entered May 23, 2017- Discovery on French Sanofi Entities

Case Management Order No. 3 (Rec. Doc. 669) entered July 21, 2017- Trial Scheduling Order

Case Management Order No. 4 (Rec. Doc. 670) entered July 21, 2017- Protocol for Initial Phase of Case-Specific Discovery for Cases Identified in Case Management Order No. 3

Case Management Order No. 5 (Rec. Doc. 762) entered August 23, 2017- General Discovery Protocol- Sanofi Defendants

Case Management Order No. 6 (Rec. Doc. 780) entered August 29, 2017- Setting Four Bellwether Trial Dates in 2019

Case Management Order No. 7 (Rec. Doc. 915) entered October 10, 2017- General Discovery Protocol – 505(b)(2) Defendants

Case Management Order No. 8 (Rec. Doc. 935) entered October 11, 2017- Trial Scheduling Order for MDL Trial No. 2

Appendix C.6

Missing PFS (Sanofi Defendants)

Matter Name	MDL Docket No.
Adams, Lynette v. Sanofi SA, et al.	2:16-cv-17499
Adduci, Linda G. v. Sanofi SA, et al.	2:17-cv-06916
Albus, Cindy v. Sanofi SA, et al.	2:17-cv-07447
Allen, Sophie L. v. Sanofi SA, et al.	2:17-cv-07463
Basford, Patricia v. Sanofi SA, et al.	2:17-cv-06609
Beeler, Sandra M. v. Sanofi SA, et al.	2:17-cv-05830
Belue, Deborah v. Sanofi SA, et al.	2:16-cv-17063
Bingham, Leslie v. Sanofi SA, et al.	2:16-cv-17502
Black, Alice v. Sanofi SA, et al.	2:16-cv-17206
Blair, Linda v. Sanofi SA, et al.	2:16-cv-17427
Blanks, Willie J. v. Sanofi SA, et al.	2:17-cv-06723
Bluestein, Helaine v. Sanofi SA, et al.	2:17-cv-06646
Brooks, Alnita v. Sanofi SA, et al.	2:16-cv-17433
Broussard, Tammy v. Sanofi SA, et al.	2:16-cv-15394
Brown, Ada v. Sanofi SA, et al.	2:16-cv-17142
Brown, Annie v. Sanofi SA, et al.	2:16-cv-15437
Buford, Gloria v. Sanofi SA, et al.	2:16-cv-17069
Burns, Betty v. Sanofi SA, et al.	2:16-cv-16778
Carter, Trinette v. Sanofi SA, et al.	2:16-cv-17073
Chapman, Joyce v. Sanofi SA, et al.	2:16-cv-17217
Clark, Linda v. Sanofi SA, et al.	2:16-cv-17164
Clements, Carole v. Sanofi SA, et al.	2:16-cv-17029
Clemons, Geneva v. Sanofi SA, et al.	2:16-cv-17059
Cole, Belinda v. Sanofi SA, et al.	2:16-cv-17945
Conley, Martha and Craig v. Sanofi SA, et al.	2:16-cv-17394
Curtis, Darlene C. v. Sanofi SA, et al.	2:17-cv-06918
Davis-Sims, Lisa v. Sanofi SA, et al.	2:16-cv-17426
Diggs, Rena v. Sanofi SA, et al.	2:16-cv-17944
Dodd, Donna and Allen v. Sanofi SA, et al.	2:16-cv-17411
Drummond, Kimberly v. Sanofi SA, et al.	2:16-cv-16942
Dumesnil, Denise v. Sanofi SA, et al.	2:17-cv-06920
Dupree, Monica v. Sanofi SA, et al.	2:16-cv-16632
Encalarde, Mary v. Sanofi SA, et al.	2:16-cv-15863
Fields, Sherry v. Sanofi SA, et al.	2:16-cv-17247

Matter Name	MDL Docket No.
Flauss, Joann v. Sanofi SA, et al.	2:16-cv-15401
Franklin, Patricia v. Sanofi SA, et al.	2:16-cv-15843
Freeman, Kapreshia v. Sanofi SA, et al.	2:16-cv-17226
Giambelluca, Denise v. Sanofi SA, et al.	2:16-cv-17251
Gillum, Lacy v. Sanofi SA, et al.	2:16-cv-17170
Gomez, Sharloett v. Sanofi SA, et al.	2:17-cv-06915
Grant, Cynthia v. Sanofi SA, et al.	2:17-cv-05013
Guy, Joe Ann and Louise Guy v. Sanofi SA, et al.	2:16-cv-17669
Hammond, Wendy and Matt v. Sanofi SA, et al.	2:16-cv-17388
Harris, Gina L. v. Sanofi SA, et al.	2:17-cv-05976
Hatchett, Angela v. Sanofi SA, et al.	2:17-cv-01673
Hayden, Cynthia A. v. Sanofi SA, et al.	2:17-cv-06921
Hernandez, Doris v. Sanofi SA, et al.	2:16-cv-15600
Higgins, Brenda v. Sanofi SA, et al.	2:16-cv-15605
Hiler, Tammy v. Sanofi SA, et al.	2:17-cv-07268
Hilliard, Shirley v. Sanofi SA, et al.	2:16-cv-16933
Hodge, Christine v. Sanofi SA, et al.	2:17-cv-07257
Holloway, Angela v. Sanofi SA, et al.	2:16-cv-17178
Hoskin-Hudson, Mary v. Sanofi SA, et al.	2:16-cv-17026
Howard, Alberta v. Sanofi SA, et al.	2:17-cv-06016
Hughes, Kristie and David v. Sanofi SA, et al.	2:16-cv-17396
Hughes, Mary v. Sanofi SA, et al.	2:16-cv-17205
Hylton, Lela v. Sanofi SA, et al.	2:16-cv-17574
Ingram, Nicole v. Sanofi SA, et al.	2:17-cv-06224
James, Marilyn v. Sanofi SA, et al.	2:17-cv-06719
Johnson, Anna v. Sanofi SA, et al.	2:16-cv-17028
Kanemaru, Emily v. Sanofi SA, et al.	2:17-cv-06031
Kennedy, Cynthia v. Sanofi SA, et al.	2:16-cv-17196
King, Tammy v. Sanofi SA, et al.	2:16-cv-17418
Klapper, Maryann Walsh v. Sanofi SA et al.	2:17-cv-00484
Kyles, Pearlie v. Sanofi SA, et al.	2:16-cv-17055
Lee, Felicia v. Sanofi SA, et al.	2:17-cv-06826
Linton, Vanessa v. Sanofi SA, et al.	2:16-cv-15679
Madison, Daniele v. Sanofi SA, et al.	2:16-cv-17391
Mahon, Melissa and Gary v. Sanofi SA, et al.	2:16-cv-17378
Matthews, Rose v. Sanofi SA, et al.	2:17-cv-06623
Mazon, Yolanda T. v. Sanofi SA, et al.	2:17-cv-05650
McCaleb, Katherine v. Sanofi SA, et al.	2:16-cv-17189

Matter Name	MDL Docket No.
McCormick, Susan v. Sanofi SA, et al.	2:17-cv-06158
Milynda, Lady Tammy and Mark v. Sanofi SA, et al.	2:16-cv-17347
Nelson, Asha v. Sanofi SA, et al.	2:16-cv-17225
Noe, Judith v. Sanofi SA, et al.	2:16-cv-17219
North, Cacita v. Sanofi SA, et al.	2:17-cv-07464
Ormsby, Joan v. Sanofi SA, et al.	2:17-cv-06139
Parker, Anjanette Lynn v. Sanofi SA, et al.	2:16-cv-16144
Parker, Linda F. v. Sanofi SA, et al.	2:16-cv-17506
Penn, Lydia v. Sanofi SA, et al.	2:16-cv-15681
Pickett, Doris v. Sanofi SA, et al.	2:16-cv-17180
Poore, Jimmie v. Sanofi SA, et al.	2:16-cv-17505
Pope, Charlotte v. Sanofi SA, et al.	2:16-cv-17416
Powell, Dorothy v. Sanofi SA, et al.	2:16-cv-17974
Powell, Tawonna v. Sanofi SA, et al.	2:16-cv-17509
Purdue, Carolyn v. Sanofi SA, et al.	2:16-cv-17230
Quick, Tracy Lynn v. Sanofi SA, et al.	2:16-cv-17582
Reed, Audrey and Elliott v. Sanofi SA, et al.	2:17-cv-04946
Robbins, Sylvania v. Sanofi SA, et al.	2:16-cv-17430
Robinson, Mildred v. Sanofi SA, et al.	2:17-cv-05986
Roebuck, Julieann and John v. Sanofi SA, et al.	2:16-cv-17720
Scott, Angela v. Sanofi SA, et al.	2:16-cv-17233
Semeniuk, Connie E. v. Sanofi SA, et al.	2:16-cv-17512
Shields, Christy and Brian v. Sanofi SA, et al.	2:16-cv-17752
Small, Shirley v. Sanofi SA, et al.	2:16-cv-17224
Smith, Judith v. Sanofi SA, et al.	2:17-cv-06888
Smith, Lauri v. Sanofi SA, et al.	2:17-cv-06293
Smith, Lee A. v. Sanofi SA, et al.	2:16-cv-17489
Soto, Maria D. v. Sanofi SA, et al.	2:17-cv-06913
Starkey, Diane v. Sanofi SA, et al.	2:16-cv-15505
Stewart, Connalita v. Sanofi SA, et al.	2:17-cv-06860
Strong, Frances A. v. Sanofi SA, et al.	2:17-cv-06908
Strunk, Rhonda v. Sanofi SA, et al.	2:16-cv-17234
Sullivan, Therese A. v. Sanofi SA, et al.	2:17-cv-06894
Talber, Virginia v. Sanofi SA, et al.	2:16-cv-17236
Truehill, Vanessa v. Sanofi SA, et al.	2:16-cv-17182
Valencia, Sonia v. Sanofi SA, et al.	2:16-cv-15497
Ward, Delores v. Sanofi SA, et al.	2:17-cv-06917
West, Annette v. Sanofi SA, et al.	2:16-cv-16062

Matter Name	MDL Docket No.
Whitelow, Shirley v. Sanofi SA, et al.	2:16-cv-17412
Williams, Cynthia v. Sanofi SA, et al.	2:16-cv-17222
Williamson, Cathy and Micah v. Sanofi SA, et al.	2:16-cv-17352
Wilson, Estoria v. Sanofi SA, et al.	2:16-cv-15676
Wilson, Frankie v. Sanofi SA, et al.	2:17-cv-06721
Yoder, Dana v. Sanofi SA, et al.	2:17-cv-06230
Young, Ellen v. Sanofi SA, et al.	2:17-cv-05993

Appendix D.6

No Deficiency Response (Sanofi Defendants)

Matter Name	MDL Docket No.
Ferguson, Sharon v. Sanofi SA, et al.	2:17-cv-03743
Ford, Marilyn v. Sanofi SA, et al.	2:17-cv-03743
Little, Evangeline v. Sanofi SA, et al.	2:17-cv-03105
Turner, Dinah v. Sanofi SA, et al.	2:16-cv-17022
Williams, Dannell v. Sanofi SA, et al.	2:17-cv-02194

Appendix E.6

PFS Not Substantially Complete (Sanofi Defendants)

Matter Name	MDL Docket No.
August, Judith v. Sanofi SA, et al.	2:16-cv-16231
Autrv, Vicki v. Sanofi SA, et al.	2:17-cv-02361
Bice, Barbara v. Sanofi SA, et al.	2:17-cv-00751
Bosch, Maria B. v. Sanofi SA, et al.	2:16-cv-17490
Boyland, Joanne v. Sanofi SA, et al.	2:17-cv-01073
Brown, Patricia v. Sanofi SA, et al.	2:16-cv-17359
Carolyn, Brasell B. v. Sanofi SA, et al.	2:16-cv-17581
Chandler, Faye v. Sanofi SA, et al.	2:16-cv-16147
Dawson, Dianne v. Sanofi SA, et al.	2:16-cv-17302
Fulcher, Jody v. Sanofi SA, et al.	2:16-cv-15855
Hays, Patsy v. Sanofi SA, et al.	2:16-cv-17540
Merchant, Valeria F. v. Sanofi SA, et al.	2:16-cv-16252
Reyes Flores, Maria v. Sanofi SA, et al.	2:16-cv-17952
Secrease, Johnnie v. Sanofi SA, et al.	2:16-cv-17959
Solomon, Paulette v. Sanofi SA, et al.	2:17-cv-10844
Stamper, Wanda v. Sanofi SA, et al.	2:16-cv-17381
Summers, Charlotte v. Sanofi SA, et al.	2:16-cv-16805
Young, Denise v. Sanofi SA, et al.	2:16-cv-16800

APPENDIX F.6

Missing PFS (505(b)(2) Defendants

Matter Name	MDL Docket No.
Adams v. Sanofi S.A., et al.	2:16-cv-17499
Allen v. Sanofi S.A., et al.	2:17-cv-07463
Arseneaux v. Sandoz Inc., et al.	2:17-cv-05757
Ashmore v. Sandoz Inc.	2:17-cv-07269
Beeler v. Sanofi S.A., et al.	2:17-cv-05830
Beller v. Sanofi S.A., et al.	2:17-cv-05830
Bingham v. Sanofi S.A., et al.	2:16-cv-17502
Blair v. Sanofi S.A., et al.	2:16-cv-17427
Brown v. Sanofi S.A., et al.	2:17-cv-06126
Clemons v. Sanofi S.A., et al.	2:16-cv-17059
Davis-Sims v. Sanofi S.A., et al.	2:16-cv-17426
Elphage v. Sandoz Inc., et al.	2:17-cv-05762
Freeman v. Sanofi S.A., et al.	2:16-cv-17226
Freeman, et al. v. Sanofi U.S. Services Inc., et al.	2:17-cv-04019
Garcia-Crump v. Sanofi S.A., et al.	2:17-cv-02789
Grace v. Sandoz Inc., et al.	2:17-cv-03716
Grant v. Sanofi S.A., et al.	2:17-cv-05013
Gullette v. Sanofi S.A., et al.	2:17-cv-02756
Guy et al v. Sanofi S.A., et al.	2:16-cv-17669
Harvick v. Sanofi S.A., et al.	2:17-cv-07578
Hollis v. Sanofi S.A., et al.	2:17-cv-02354
Holloway v. Sandoz Inc., et al.	2:17-cv-05794
Howard v. Sanofi S.A., et al.	2:17-cv-06016
Ingram v. Sanofi S.A., et al.	2:17-cv-06224
Ison v. Sanofi S.A., et al.	2:17-cv-06922
Johnson v. Sandoz Inc., et al.	2:17-cv-05566
King v. Sanofi S.A., et al.	2:16-cv-17418
Madison v. Sanofi S.A., et al.	2:16-cv-17391
Mayhan v. Sanofi S.A., et al.	2:17-cv-06557
Mazon v. Sanofi S.A., et al.	2:17-cv-05650
McCrea, et al. v. Sandoz Inc., et al.	2:17-cv-04817
McKinley v. Sanofi S.A., et al.	2:17-cv-04758
Milynda, et al. v. Sanofi S.A., et al.	2:16-cv-17347
Mobley v. Sanofi S.A., et al.	2:17-cv-05358
Moen v. Sanofi S.A., et al.	2:17-cv-06776
Nash v. Sanofi S.A., et al.	2:17-cv-07661
Nelson v. Sandoz Inc., et al.	2:17-cv-06196
Newton v. Sandoz Inc., et al.	2:17-cv-07354
North v. Sanofi S.A., et al.	2:17-cv-07464
Parks v. Sandoz Inc., et al.	2:17-cv-06141

Matter Name	MDL Docket No.
Pope v. Sanofi S.A., et al.	2:16-cv-17416
Reed, et al. v. Sanofi S.A., et al.	2:17-cv-04946
Roebuck, et al. v. Sanofi S.A., et al.	2:16-cv-17720
Scott v. Sandoz Inc., et al.	2:17-cv-06204
Smith v. Sanofi S.A., et al.	2:17-cv-06293
Sullivan v. Sanofi S.A., et al.	2:17-cv-06894
Turner v. Sandoz Inc., et al.	2:17-cv-07732
White v. Sanofi S.A., et al.	2:16-cv-17485
Whitelow v. Sanofi S.A., et al.	2:16-cv-17412
Zeno v. Sanofi-Aventis U.S. LLC, et al.	2:17-cv-04642

APPENDIX G.6

Deficiency – No Response (505(b)(2) Defendants)

Matter Name	MDL Docket No.
Adams v. Sanofi S.A., et al.	2:16-cv-16299
Autry v. Sanofi S.A., et al.	2:17-cv-02361
Baxter v. Sanofi-Aventis U.S. LLC, et al.	2:17-cv-01502
Bice v. Sanofi S.A., et al.	2:17-cv-00751
Carbino, et al. v. Sanofi-Aventis US, LLC, et al.	2:17-cv-00539
Cook v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-17980
Dickerson, et al. v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16776
Garner v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16803
Georgalos v. Sanofi S.A., et al.	2:16-cv-17314
Hammitt v. Sanofi S.A., et al.	2:17-cv-00319
Harrell v. Sanofi S.A., et al.	2:17-cv-00792
Jackson v. Sanofi S.A., et al.	2:17-cv-00381
Jackson, et al. v. Sanofi S.A., et al.	2:16-cv-16796
Long v. Sanofi S.A., et al.	2:17-cv-01166
Long v. Sanofi S.A., et al.	2:16-cv-16781
Lonzo v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16793
Lyles v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16773
Manser v. Sanofi S.A., et al.	2:17-cv-02072
Nixon v. Sanofi U.S. Services Inc., et al.	2:17-cv-03978
Prince v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-17801
Renaud v. Sanofi S.A., et al.	2:17-cv-01209
Steinbeiser v. Sanofi S.A., et al.	2:17-cv-03403
Tabron v. Sanofi S.A., et al.	2:17-cv-01729
Thomas v. Sanofi S.A., et al.	2:17-cv-01732
Woodgett, et al. v. Sanofi S.A., et al.	2:16-cv-15491

APPENDIX H.6

Not Substantially Complete (505(b)(2) Defendants)

Matter Name	MDL Docket No.
Adams v. Sanofi S. A., et al.	2:16-cv-16299
Anknew v. Sanofi S.A., et al.	2:16-cv-17325
Autry v. Sanofi S.A., et al.	2:17-cv-02361
Baxter v. Sanofi-Aventis U.S. LLC, et al.	2:17-cv-01502
Beasley v. Sanofi S.A., et al.	2:17-cv-06824
Bice v. Sanofi S.A., et al	2:17-cv-00751
Blevins v. Sanofi S.A., et al.	2:17-cv-05528
Blumlo, et al v. Sanofi S.A., et al.	2:16-cv-17972
Boyland v. Sanofi S.A., et al.	2:17-cv-00793
Brewer v. Sanofi S.A., et al.	2:16-cv-17313
Brown v. Sanofi S.A., et al.	2:16-cv-17359
Brown v. Sanofi-Aventis LLC, Sandoz Inc.	2:16-cv-17928
Browne v. Sanofi S.A., et al.	2:17-cv-03129
Burks v. Sanofi S.A., et al	2:17-cv-01738
Burns et al. v. Sanofi S.A., et al.	2:16-cv-17358
Carbino, et al. v. Sanofi-Aventis U.S. LLC, et al.	2:17-cv-00539
Cook v. Sanofi-Aventis U.S. LLC	2:16-cv-17980
Crayton v. Sanofi, S.A., et. al.	2:17-cv-05923
Daniels v. Sanofi S.A., et al.	2:17-cv-05275
Dickerson, et al. v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16776
Edwards-Woodard, et al. v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16799
Floyd v. Sanofi, S.A., et al.	2:16-cv-17023
Garner v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16803
Gidcomb, et al. v. Accord Healthcare, Inc., et al.	2:17-cv-04972
Green v. Sanofi-Aventis U. S. LLC, et al.	2:17-cv-10752
Harrell v. Sanofi S.A., et al.	2:17-cv-00792
Hartso v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-17984
Hawkins v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16790
Hershey v. Sanofi S.A., et al.	2:17-cv-01170
Hogan v Sanofi S.A., et al.	2:16-cv-17431
Honore v. Sandoz, Inc., et al.	2:17-cv-05053
Hyter v. Sanofi S.A., et al.	2:16-cv-17326
Jackson v. Sanofi S.A., et al.	2:17-cv-00381
Jackson v. Sanofi S.A., et al.	2:17-cv-07056
Jackson, et al v. Sanofi, S.A., et al.	2:16-cv-16796
Janjanin v. Sanofi S.A., et al.	2:17-cv-00885
Johnson v. Hospira, Inc., et al.	2:17-cv-06699
Johnson v. Sanofi S.A., et al.	2:17-cv-06274
Johnson v. Sanofi-Aventis U.S. LLC et al.	2:16-cv-15296
Jordan v. Sanofi S.A., et al.	2:17-cv-02340
LaMartina v. Sanofi S.A., et al.	2:17-cv-05924

Matter Name	MDL Docket No.
Lee v. Sanofi S.A., et al.	2:17-cv-03394
Lee v. Sanofi S.A., et al.	2:17-cv-05927
Liles v. SANOFI S.A., et al.	2:16-cv-15575
Long v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16781
Lonzo v. Sanofi-Aventis U.S. LLC	2:16-cv-16793
Lyles v. Sanofi-Aventis U.S. LLC, et al.	2:16-cv-16773
Manser v. Sanofi S.A., et al.	2:17-cv-02072
McConnell v. Sanofi Aventis, et al.	2:17-cv-02338
McNeese v. Sanofi S.A., et al.	2:16-cv-17769
Mendoza v. Sanofi S.A., et al.	2:17-cv-03397
Mills v. Sanofi S.A., et al.	2:17-cv-02689
Montague v. Sanofi S.A., et al.	2:17-cv-05979
Morrison v. Sanofi S.A., et al.	2:16-cv-17312
Parkinson v. Sanofi S.A., et al.	2:17-cv-00960
Pickens v. Sanofi S.A., et al.	2:17-cv-05898
Porter v. Sanofi Aventis, et al.	2:17-cv-05665
Rasussen v. Sanofi S.A., et al.	2:17-cv-04840
Rivera and Maria Reyes Flores v. Sanofi S.A., et al.	2:16-cv-16751
Rivers v. Sanofi S.A., et al.	2:17-cv-00862
Sanders v. Sanofi Aventis, et al.	2:17-cv-05669
Schlotterbeck v. Sanofi Aventis, et al.	2:17-cv-05673
Secrease v. Sanofi, S.A., et al.	2:16-cv-17959
Smith v. Sanofi S.A., et al.	2:17-cv-03126
Steinbeiser v. Sanofi S.A., et al.	2:17-cv-03403
Stevens v. Sanofi S.A., et al.	2:17-cv-05918
Stewart v. Sanofi, S.A., et al.	2:17-cv-00375
Stuckey v. Sanofi Aventis S.A., et al.	2:17-cv-05603
Tabron v. Sanofi-Aventis U.S., LLC, et al.	2:17-cv-01729
Thomas v. Sanofi-Aventis U.S. LLC, et al.	2:17-cv-01732
Turner v. Sandoz Inc.	2:17-cv-04827
Turner v. Sanofi S.A., et al.	2:17-cv-05481
Walker v. Sanofi S.A., et al.	2:17-cv-05084
Warren v. Sanofi S.A., et al.	2:17-cv-06262
Warren v. Sanofi S.A., et al.	2:17-cv-06833
Woodgett, et al. v. Sanofi S.A., et al.	2:16-cv-15491
Zienka v. Sanofi S.A., et al.	2:17-cv-04173

Appendix I.6

Missing PFS (Sanofi Defendants)

Matter Name	MDL Docket No.
Brown, Tammy v. Sanofi SA, et al.	2:17-cv-05427
Gullette, Regina v. Sanofi SA, et al.	2:17-cv-02756
Yoho, Julie v. Sanofi SA, et al.	2:17-cv-04125

No Deficiency Response (Sanofi Defendants)

Matter Name	MDL Docket No.
Dunn, Brenda v. Sanofi SA, et al.	2:17-cv-00912
Sims, Brenda v. Sanofi SA, et al.	2:16-cv-16257