

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

IN RE: XARELTO (RIVAROXABAN) * 14-MD-2592
PRODUCTS LIABILITY LITIGATION *
* Section L
*
Relates to: All Cases * January 22, 2016
*
* * * * *

STATUS CONFERENCE BEFORE THE
HONORABLE ELDON E. FALLON
UNITED STATES DISTRICT JUDGE

Appearances:

For the Plaintiffs: Gainsburgh Benjamin David Meunier
& Warshauer, LLC
BY: GERALD E. MEUNIER, ESQ.
1100 Poydras Street, Suite 2800
New Orleans, Louisiana 70163

For the Defendants: Irwin Fritchie Urquhart
& Moore, LLC
BY: JAMES B. IRWIN, ESQ.
400 Poydras Street, Suite 2700
New Orleans, Louisiana 70130

Official Court Reporter: Toni Doyle Tusa, CCR, FCRR
500 Poydras Street, Room B-275
New Orleans, Louisiana 70130
(504) 589-7778

Proceedings recorded by mechanical stenography using
computer-aided transcription software.

INDEX

	<u>Page</u>
Pretrial Orders	3
Case Management Orders 2, 3, and 4	4
Bellwether Selections	4
Counsel Contact Information Form	5
Plaintiff and Defendant Fact Sheets	5
Bundling of Pleadings	8
Preservation Order	10
Parties' Interactions with Physicians	10
Discovery	10
Deposition Guidelines	11
Discovery Issued to Third Parties	13
State/Federal Coordination	13

0 9 : 0 8
1 letters in order to make it possible to proceed with the
2 release of the IMS prescription data.

3 **THE COURT:** As you all know and those on the phone
4 know, I put all of these orders on my website. So if you are
5 interested in looking at any of them, you can just go to the
6 website and pull one down.

7 **MR. MEUNIER:** Your Honor, Sections 2 and 3 of the
8 joint report deal with CMOs 2, 3, and 4 and with the selection
9 of bellwether candidates for the discovery pool.

10 We are pleased to report that the MDL Centrality
11 system that you put in place for this litigation has proved to
12 be a very useful tool in this process and that using the data
13 and pursuant to the provisions of the CMOs, we now have a
14 discovery pool of 40 cases selected. The parties will now
15 proceed with merits discovery specific to those cases.

16 The PSC has reached out and made contact with
17 plaintiffs' counsel for the 40 selected cases to educate them
18 about the implications of the selection, educate them about the
19 process set up by the Court, and to most importantly secure
20 their cooperation going forward as the PSC works with them on
21 those cases.

22 **THE COURT:** What we are trying to do, obviously, is
23 select cases that can be tried that are bellwether cases that
24 give the lawyers and the litigants an opportunity to see what
25 juries do and how lawyers handle the various cases.

0 9 : 1 0

1 The problem in the past with selecting
2 bellwether cases is that we didn't drill down on the numbers of
3 cases in order to decide what's a good bellwether case. It was
4 a little bit random. So what we are trying to do now is to
5 pick 40 cases. Hopefully these 40 cases mimic the census of
6 the entire litigation, and we will hear in a moment from Jake
7 Woody on the numbers.

8 It looks like we have cases from every state in
9 the union now, 4,000 or 5,000 cases. We are not going to be
10 able to discover 4,000 or 5,000 cases. So what we are trying
11 to do is select a representative number of those cases, 40
12 cases, and then the parties can drill down on those 40 cases,
13 find out more about those 40 cases, and then make an
14 intelligent selection of a bellwether that represents
15 litigation and things of that sort. That's the aspect of the
16 case we are in now.

17 **MR. MEUNIER:** Section 4 of the joint report, Judge,
18 addresses counsel contact information forms. That system seems
19 to be working pursuant to your PTO 4A, and we appreciate
20 counsel keeping co-liaison for plaintiffs updated on their
21 contact information.

22 Sections 5 and 6 of the joint report deal with
23 plaintiff and defendant fact sheets. Before we hear from Jake
24 Woody on his data report with respect to those fact sheets, let
25 me just mention the process that we have put in place, with the

0 9 : 1 2
1 cooperation of opposing counsel, regarding late and allegedly
2 deficient plaintiff fact sheets.

3 The system basically allows the PSC to be
4 notified of the cases as to which the defendants believe there
5 is lateness or deficiency. We are then given an opportunity to
6 reach out to the plaintiff attorneys in those cases and try to
7 work out or cure whatever problems we can cure with regard to
8 the issues raised.

9 In the event that we are not successful, the
10 names are then placed by the defendant group on a motion and
11 order to show cause for the dismissal of those cases.
12 Realizing how serious that is for the plaintiffs, we obviously
13 rely upon appropriate due process notice safeguards to be in
14 place before Your Honor hears any motion for the dismissal with
15 prejudice.

16 **THE COURT:** I again reinforce the fact that it's
17 important that the plaintiffs fill in the fact sheets, just as
18 it's important that the defendants fill in the fact sheets. In
19 cases of this sort, we try to do it as quickly as possible, so
20 we don't use interrogatories. We use fact sheets in place of
21 interrogatories so that the parties have an opportunity to
22 decide what information they need and then prepare a fact sheet
23 to obtain that information. If the parties can't agree, then I
24 weigh in on it. The fact sheets for the plaintiff, fact sheets
25 for the defendant are sent out, and I expect them to come back.

0 9 : 1 3

1 If the plaintiffs don't fill in the fact sheets, then their
2 case is liable to be dismissed. So it's a significant thing.

3 With regard to the fact sheets, Jake, why don't
4 you come in at this point and give us some statistics, how many
5 you have, and that sort of thing.

6 **MR. WOODY:** Certainly, Your Honor. It's Jake Woody
7 from BrownGreer in Richmond, Virginia. I do have just a brief
8 report on MDL Centrality and the fact sheet process.

9 We have 310 firms registered with MDL Centrality
10 at this point and over 1,000 individual users in the system.
11 To date we have received 3,468 plaintiff fact sheets, and
12 according to the Court's records there are 4,163 separate
13 cases. So we do expect to continue to receive fact sheets into
14 the future.

15 Along with those fact sheets, we have received
16 over 53,000 separate documents: medical records, HIPAA
17 authorizations, things of that nature. We are receiving about
18 500 fact sheets a month. That's our average. It's been the
19 average over the last six months.

20 The defendants themselves have uploaded 2,733
21 defendant fact sheets and have issued 2,405 deficiency notices
22 that will form, I think, the backbone of what Jerry was talking
23 about a few minutes ago.

24 We worked with the parties to comply with CMO 4
25 to select the bellwether cases. That process went very

0 9 : 1 5
1 smoothly. We are happy to report that it was, I think, a good
2 improvement on the bellwether system in MDLs.

3 We do receive on a regular basis inquiries from
4 new firms and new people as to how to use the system and how to
5 register. If anyone on the phone or in the courthouse has any
6 questions about MDL Centrality or needs help, the best way to
7 get ahold of us is to e-mail us at
8 MDLCentrality@BrownGreer.com. We do have people who monitor
9 that inbox and can respond to any questions that come in very
10 quickly.

11 So that's my brief monthly report, Your Honor.
12 If there are any questions, I'm happy to answer.

13 **THE COURT:** Thank you very much.

14 Let's move to the next one.

15 **MR. MEUNIER:** Your Honor, the next section of the
16 report, Section 7, deals with bundled complaints and responsive
17 pleadings.

18 Your Honor has authorized the use of an exemplar
19 joint complaint and then short form complaints for specific
20 information on claims. An issue did arise with respect to the
21 proper citizenship of one of the Bayer entities. The PSC,
22 therefore, has made a correction to reflect that change by
23 providing an updated template for a joint complaint to be
24 posted on the Court's website.

25 Otherwise, what I would mention in this section,

0 9 : 1 6

1 Your Honor, is that there are subject matter jurisdictional
2 questions that we know exist with respect to certain federally
3 filed cases as to which there may not be complete diversity of
4 citizenship. Knowing that, the PSC is simply concerned that we
5 bring to the surface sooner rather than later those
6 jurisdictional issues and challenges so that both sides don't
7 invest a lot of time and resources and money in pursuing cases
8 that are always going to be subject to dismissal on a lack of
9 diversity basis. So I think we are going to be in discussion
10 with opposing counsel about the proper way to expedite the
11 raising of the jurisdictional issues as to cases which are now
12 pending as to which case that there is a diversity question.

13 **THE COURT:** Okay. Also, with the exemplar pleadings,
14 I remind the lawyers who represent these individuals you have
15 to analyze your particular case. If you use an exemplar
16 pleading, be conscious of the fact that it is an exemplar
17 pleading. Some of it may not fit your particular case.

18 The fact that it's an exemplar pleading doesn't
19 get you over the jurisdictional problem or hurdle. You have to
20 analyze your case as to whether or not this exemplar pleading
21 fits your case. If it doesn't, then don't use it. If it does,
22 you're welcome to at least look at it and think about using it.
23 It's your responsibility to make that initial decision.

24 **MR. MEUNIER:** Thank you, Judge.

25 With respect to Section 8, preservation order, I

09:18

1 just wanted to simply call to the attention of plaintiffs'
2 counsel the provisions of PTO 15B, just as I'm sure the
3 defendants have reminded the appropriate people on their side.
4 There is an alternative set forth in that with respect to
5 voicemails, IM or instant messaging, and text imaging, which is
6 that you either refrain from any further use of those means to
7 discuss the issues in this case or, if you don't refrain, that
8 you must preserve under the provisions of 15B.

9 The next section, Your Honor, deals with the
10 pending motion by the defendants regarding contact with
11 physicians on the part of plaintiffs' counsel. This matter has
12 been the subject of some briefing discussions, and the parties
13 have agreed to some briefing deadlines which are set forth in
14 the joint report.

15 We will submit a formal order for the Court to
16 enter, with the Court's agreement, to solidify those dates, but
17 plaintiffs' response to the pending motion is now due
18 February 1 and defendants' reply will be February 10. The
19 matter will be orally argued before Your Honor following the
20 status conference on February 23.

21 As to discovery which is covered in Section 10,
22 Judge, you continue to have with us biweekly discovery
23 conferences. We find the scheduling as well as the conduct of
24 those conferences to be extremely helpful, keeping us focused
25 on matters that we can try to work out without your help or, if

0 9 : 2 0
1 necessary, bring to your attention.

2 **THE COURT:** What we have tried to do is that every
3 two weeks I meet with the parties telephonically, and we
4 discuss any discovery issues at that point and make a decision
5 at that time so that we can move on. Oftentimes with these
6 cases, if you take discovery issues under advisement,
7 everything stops. The train just stops.

8 I want to meet with them every two weeks.
9 Sometimes we won't have much to discuss. Sometimes knowing
10 that we have something to discuss precipitates some discussion
11 between and among the parties, but I think it moves it faster
12 this way. I have given them another series of dates that I
13 will be meeting with them.

14 **MR. MEUNIER:** Your Honor, this section of the report
15 on discovery also references privilege logs. The parties
16 continue to have meet-and-confer discussions about that issue
17 and are hopeful of resolving any and all differences on
18 privilege logs.

19 We also mention in this section the noticing of
20 defendant employee depositions. The first of those is to take
21 place in New Jersey on February 10. I'm pleased to report that
22 there were some differences between the parties that were
23 worked out with respect to the logistics and the dates and
24 locations of those depositions. We appreciate counsel's
25 efforts in resolving those issues without need for the Court to

0 9 : 2 1
1 become involved.

2 **THE COURT:** As I understand it, the plaintiffs have
3 agreed not to subpoena the individual employees at their home
4 but to tell the defendant counsel so that they can make
5 arrangements to have the people there.

6 **MR. MEUNIER:** Correct, Your Honor. Yes. We only
7 regarded that to be a necessity when we did not have agreement,
8 but we now have agreement.

9 Finally, Judge, in the discovery section we
10 reference the third request for production of documents that
11 the PSC has propounded to the defendants. Following the
12 defendants' response, we felt it necessary to file a motion to
13 compel. That motion is now filed and set for oral argument by
14 telephone with Your Honor on February 3 at 3:30 p.m. We do not
15 yet have the defendants' opposition brief, but under the local
16 rules I think there's agreement that the defendants' memo in
17 opposition will be filed no later than January 26, which is
18 next Tuesday, I believe.

19 The next section of the report, Section 11,
20 deals with deposition protocol and guidelines. The parties
21 have, I think, worked diligently to resolve a number of issues
22 concerning the deposition protocol in this case. Of course, as
23 I mentioned, we have the first deposition taking place
24 February 10, so we know there's a time urgency in resolving
25 these problems.

0 9 : 2 3

1 We have been able to resolve a number of
2 problems, but some remain unresolved. As we told the Court in
3 chambers this morning, our hope is to continue to work on
4 resolving a lot of those issues. We know today, though, that
5 there are certain issues which will require oral argument
6 before the Court today. So following the conference, on those
7 issues as to which we do not expect to be able to make an
8 agreement, Your Honor will hear oral argument from both sides.

9 As to the remaining issues, where we think there
10 is still the chance of working matters out, we will continue to
11 work with opposing counsel. We would ask the Court to allow us
12 on the February 3 telephone hearing on the motion to compel, to
13 add some additional time after that for oral argument on
14 whatever we can't work out with respect to the deposition
15 protocol.

16 Your Honor, third-party discovery is essentially
17 continuing as a process with respect to both the FDA and the
18 Duke Clinical Research Institute. With respect to Duke, as
19 Mr. Davis reported to you earlier in chambers, the effort has
20 been to streamline the production of documents. We have
21 discussed search term narrowing for that purpose, and we are
22 hopeful that Duke will continue to work with us and we will
23 have a complete return on what we need from that source.

24 The next section is state/federal coordination,
25 and Ms. Barrios is here to report on that.

0 9 : 2 4
1 **MS. BARRIOS:** Thank you, Mr. Meunier.

2 Good morning, Your Honor. Dawn Barrios for the
3 federal/state committee.

4 Based upon the information that the defendants
5 kindly send to me every month, I have prepared a state court
6 status chart I have provided to the parties and to your law
7 clerk.

8 Just as the numbers of the cases continue to
9 mount in the MDL, we have substantial changes in the state
10 courts. If Your Honor would look at the last page, we have a
11 total.

12 There are 572 cases filed outside of the MDL,
13 but 527 of them are filed in Pennsylvania. Since the last
14 status conference, there have been 37 additional cases filed
15 around the country. In those 37 cases, there are 41 actual
16 Xarelto users. I would like to count those users as the
17 plaintiffs instead of the number of cases.

18 Your Honor, both co-lead counsel from
19 Pennsylvania are here in case you have a question, Mr. Gallucci
20 and Mr. Weinkowitz. They report to me that everything is going
21 smoothly and there's no trial date set. If you have any
22 questions, they are happy to answer them.

23 **THE COURT:** No. I just want to express my
24 appreciation for them coming.

25 I think it's very helpful for you all. If you

0 9 : 2 6
1 need anything from the MDL, I will make sure you get it. So
2 keep in touch and participate in it. Whatever suggestions or
3 information you have, I'm very responsive to it so that we can
4 coordinate this matter. I think it's for everybody's benefit,
5 and particularly the benefit of the claimants and to the
6 defendants also.

7 **MS. BARRIOS:** Your Honor, I forgot to report one
8 thing. There have been no new judges added since the last
9 couple of conferences, so you don't have to worry about sending
10 out your letter.

11 **THE COURT:** Okay. Fine. Anything else?

12 **MR. MEUNIER:** Your Honor, I think what remains is to
13 set the March status conference. February 23 is the next
14 status conference.

15 **THE COURT:** February 23 is the next one. The
16 following one is March 16 at 2:00 p.m.

17 Why don't we go into the discovery motions at
18 this point. Jim, do you have anything?

19 **MR. IRWIN:** Your Honor, I've been asked to address
20 the personnel file issue. I don't know if you want to hear
21 from us first. I'm glad to go first because we are the ones
22 saying no.

23 **MR. MEUNIER:** Your Honor, we do need just a few
24 minutes to set up.

25 **THE COURT:** Okay. Let's take a five-minute break,

1 then, and come back. Court will stand in recess.

2 **THE DEPUTY CLERK:** All rise.

3 (Proceedings adjourned.)

4 * * *

5 **CERTIFICATE**

6 I, Toni Doyle Tusa, CCR, FCRR, Official Court
7 Reporter for the United States District Court, Eastern District
8 of Louisiana, certify that the foregoing is a true and correct
9 transcript, to the best of my ability and understanding, from
10 the record of proceedings in the above-entitled matter.

11
12
13 s/ Toni Doyle Tusa
14 Toni Doyle Tusa, CCR, FCRR
15 Official Court Reporter
16
17
18
19
20
21
22
23
24
25

<p>1</p> <p>1,000 [1] 7/10 10 [4] 10/18 10/21 11/21 12/24 11 [1] 12/19 1100 [1] 1/15 13 [2] 2/13 2/14 14-MD-2592 [1] 1/4 14B [1] 3/22 15B [2] 10/2 10/8 16 [1] 15/16</p>	<p>agree [1] 6/23 agreed [2] 10/13 12/3 agreement [5] 10/16 12/7 12/8 12/16 13/8 ahold [1] 8/7 aided [1] 1/25 all [7] 1/6 3/24 4/3 4/4 11/17 14/25 16/2 allegedly [1] 6/1 allow [1] 13/11 allows [1] 6/3 Along [1] 7/15 also [4] 9/13 11/15 11/19 15/6 alternative [1] 10/4 always [1] 9/8 among [1] 11/11 analyze [2] 9/15 9/20 another [1] 11/12 answer [2] 8/12 14/22 any [9] 4/5 6/14 8/5 8/9 8/12 10/6 11/4 11/17 14/21 anyone [1] 8/5 anything [3] 15/1 15/11 15/18 appearances [2] 1/12 3/8 appreciate [2] 5/19 11/24 appreciation [1] 14/24 appropriate [2] 6/13 10/3 are [31] argued [1] 10/19 argument [4] 12/13 13/5 13/8 13/13 arise [1] 8/20 around [1] 14/15 arrangements [1] 12/5 as [24] ask [1] 13/11 asked [1] 15/19 aspect [1] 5/15 at [13] 4/5 7/4 7/10 8/7 9/22 9/22 11/4 11/5 12/3 12/14 14/10 15/16 15/17 attention [2] 10/1 11/1 attorneys [1] 6/6 authorizations [1] 7/17 authorized [1] 8/18 average [2] 7/18 7/19</p>	<p>BrownGreer [1] 7/7 BrownGreer.com [1] 8/8 bundled [1] 8/16 but [7] 10/16 11/11 12/4 12/8 12/15 13/2 14/13</p>
<p>2</p> <p>2,405 [1] 7/21 2,733 [1] 7/20 2016 [2] 1/6 3/2 22 [2] 1/6 3/2 23 [3] 10/20 15/13 15/15 2592 [2] 1/4 3/6 26 [1] 12/17 2700 [1] 1/18 275 [1] 1/20 2800 [1] 1/15 2:00 p.m [1] 15/16</p>	<p>B</p> <p>B-275 [1] 1/20 back [2] 6/25 16/1 backbone [1] 7/22 Barrios [2] 13/25 14/2 Based [1] 14/4 basically [1] 6/3 basis [2] 8/3 9/9 Bayer [2] 3/13 8/21 be [20] because [1] 15/21 become [1] 12/1 been [8] 3/21 7/18 10/12 13/1 13/20 14/14 15/8 15/19 before [5] 1/9 5/23 6/14 10/19 13/6 believe [2] 6/4 12/18 bellwether [7] 4/9 4/23 5/2 5/3 5/14 7/25 8/2 benefit [2] 15/4 15/5 Benjamin [1] 1/14 best [2] 8/6 16/9 between [2] 11/11 11/22 bit [1] 5/4 biweekly [1] 10/22 both [4] 9/6 13/8 13/17 14/18 break [1] 15/25 brief [3] 7/7 8/11 12/15 briefing [2] 10/12 10/13 bring [2] 9/5 11/1</p>	<p>C</p> <p>call [2] 3/5 10/1 can [9] 4/5 4/23 5/12 6/7 8/9 10/25 11/5 12/4 15/3 can't [2] 6/23 13/14 candidates [1] 4/9 case [12] 3/5 5/3 5/16 7/2 9/12 9/15 9/17 9/20 9/21 10/7 12/22 14/19 cases [34] cause [1] 6/11 CCR [3] 1/20 16/6 16/13 census [1] 5/5 Centrality [4] 4/10 7/8 7/9 8/6 certain [2] 9/2 13/5 Certainly [1] 7/6 CERTIFICATE [1] 16/5 certify [1] 16/8 challenges [1] 9/6 chambers [2] 13/3 13/19 chance [1] 13/10 change [1] 8/22 changes [1] 14/9 chart [1] 14/6 citizenship [2] 8/21 9/4 claimants [1] 15/5 claims [1] 8/20 clerk [1] 14/7 Clinical [1] 13/18 CMO [1] 7/24 CMO 4 [1] 7/24 CMOs [2] 4/8 4/13 co [3] 3/10 5/20 14/18 co-lead [1] 14/18 co-liaison [2] 3/10 5/20 come [4] 6/25 7/4 8/9 16/1 coming [1] 14/24 committee [1] 14/3 compel [2] 12/13 13/12 complaint [2] 8/19 8/23 complaints [2] 8/16 8/19 complete [2] 9/3 13/23 comply [1] 7/24 computer [1] 1/25 computer-aided [1] 1/25 concerned [1] 9/4 concerning [1] 12/22 conduct [1] 10/23 confer [1] 11/16 conference [8] 1/9 3/15 3/22 10/20 13/6 14/14 15/13 15/14 conferences [3] 10/23 10/24 15/9 conscious [1] 9/16 consent [2] 3/23 3/25 contact [4] 4/16 5/18 5/21 10/10 continue [7] 7/13 10/22 11/16 13/3 13/10 13/22 14/8 continuing [1] 13/17 cooperation [2] 4/20 6/1 coordinate [1] 15/4 coordination [2] 2/14 13/24 correct [2] 12/6 16/8 correction [1] 8/22 counsel [14] 3/8 3/10 3/17 3/25 4/17 5/18 5/20 6/1 9/10 10/2 10/11 12/4 13/11 14/18 counsel's [1] 11/24 count [1] 14/16</p>
<p>3</p> <p>3,468 [1] 7/11 310 [1] 7/9 37 [2] 14/14 14/15 3:30 p.m [1] 12/14</p>	<p>4</p> <p>4,000 [2] 5/9 5/10 4,163 [1] 7/12 40 [7] 4/14 4/17 5/5 5/5 5/11 5/12 5/13 400 [1] 1/18 41 [1] 14/15 4A [1] 5/19</p>	<p>5</p> <p>5,000 [2] 5/9 5/10 500 [2] 1/20 7/18 504 [1] 1/21 527 [1] 14/13 53,000 [1] 7/16 572 [1] 14/12 589-7778 [1] 1/21</p>
<p>4</p> <p>4,000 [2] 5/9 5/10 4,163 [1] 7/12 40 [7] 4/14 4/17 5/5 5/5 5/11 5/12 5/13 400 [1] 1/18 41 [1] 14/15 4A [1] 5/19</p>	<p>7</p> <p>70130 [2] 1/19 1/21 70163 [1] 1/16 7778 [1] 1/21</p>	<p>A</p> <p>ability [1] 16/9 able [3] 5/10 13/1 13/7 about [10] 4/18 4/18 5/13 7/17 7/23 8/6 9/10 9/22 11/16 15/9 above [1] 16/10 above-entitled [1] 16/10 according [1] 7/12 actual [1] 14/15 add [1] 13/13 added [1] 15/8 additional [2] 13/13 14/14 address [1] 15/19 addresses [1] 5/18 adjourned [1] 16/3 advisement [1] 11/6 after [1] 13/13 again [1] 6/16 agenda [1] 3/18 ago [2] 3/17 7/23</p>

<p>C</p> <p>country [1] 14/15 couple [2] 3/15 15/9 course [1] 12/22 court [14] 1/1 1/20 3/19 4/19 10/15 11/25 13/2 13/6 13/11 14/5 16/1 16/6 16/7 16/14 Court's [3] 7/12 8/24 10/16 courthouse [1] 8/5 courts [1] 14/10 covered [1] 10/21 cure [2] 6/7 6/7</p>	<p>employee [1] 11/20 employees [1] 12/3 enter [1] 10/16 entered [1] 3/22 entire [1] 5/6 entities [1] 8/21 entitled [1] 16/10 ESQ [2] 1/15 1/18 essentially [1] 13/16 event [1] 6/9 every [4] 5/8 11/2 11/8 14/5 everybody's [1] 15/4 everything [2] 11/7 14/20 exemplar [6] 8/18 9/13 9/15 9/16 9/18 9/20 exist [1] 9/2 expect [3] 6/25 7/13 13/7 expedite [1] 9/10 express [1] 14/23 extremely [1] 10/24</p>	<p>give [2] 4/24 7/4 given [2] 6/5 11/12 glad [1] 15/21 go [3] 4/5 15/17 15/21 going [5] 4/20 5/9 9/8 9/9 14/20 good [5] 3/3 3/12 5/3 8/1 14/2 group [1] 6/10 guidelines [1] 12/20</p>
<p>D</p> <p>data [4] 3/23 4/2 4/12 5/24 date [2] 7/11 14/21 dates [3] 10/16 11/12 11/23 David [1] 1/14 Davis [1] 13/19 Dawn [1] 14/2 deadlines [1] 10/13 deal [2] 4/8 5/22 deals [3] 8/16 10/9 12/20 decide [2] 5/3 6/22 decision [2] 9/23 11/4 defendant [7] 3/24 5/23 6/10 6/25 7/21 11/20 12/4 defendants [9] 1/17 6/4 6/18 7/20 10/3 10/10 12/11 14/4 15/6 defendants' [4] 10/18 12/12 12/15 12/16 deficiency [2] 6/5 7/21 deficient [1] 6/2 deposition [4] 12/20 12/22 12/23 13/14 depositions [2] 11/20 11/24 did [2] 8/20 12/7 didn't [1] 5/2 differences [2] 11/17 11/22 diligently [1] 12/21 discover [1] 5/10 discovery [12] 2/13 4/9 4/14 4/15 10/21 10/22 11/4 11/6 11/15 12/9 13/16 15/17 discuss [5] 3/18 10/7 11/4 11/9 11/10 discussed [1] 13/21 discussion [2] 9/9 11/10 discussions [2] 10/12 11/16 dismissal [3] 6/11 6/14 9/8 dismissed [1] 7/2 DISTRICT [5] 1/1 1/2 1/10 16/7 16/7 diversity [3] 9/3 9/9 9/12 do [14] 4/22 4/25 5/4 5/11 6/19 7/7 7/13 8/3 8/8 11/2 12/14 13/7 15/18 15/23 documents [3] 7/16 12/10 13/20 does [1] 9/21 doesn't [2] 9/18 9/21 don't [9] 6/20 7/1 7/3 9/6 9/21 10/7 15/9 15/17 15/20 down [3] 4/6 5/2 5/12 Doyle [4] 1/20 16/6 16/13 16/13 drill [2] 5/2 5/12 due [2] 6/13 10/17 Duke [3] 13/18 13/18 13/22</p>	<p>D</p> <p>data [4] 3/23 4/2 4/12 5/24 date [2] 7/11 14/21 dates [3] 10/16 11/12 11/23 David [1] 1/14 Davis [1] 13/19 Dawn [1] 14/2 deadlines [1] 10/13 deal [2] 4/8 5/22 deals [3] 8/16 10/9 12/20 decide [2] 5/3 6/22 decision [2] 9/23 11/4 defendant [7] 3/24 5/23 6/10 6/25 7/21 11/20 12/4 defendants [9] 1/17 6/4 6/18 7/20 10/3 10/10 12/11 14/4 15/6 defendants' [4] 10/18 12/12 12/15 12/16 deficiency [2] 6/5 7/21 deficient [1] 6/2 deposition [4] 12/20 12/22 12/23 13/14 depositions [2] 11/20 11/24 did [2] 8/20 12/7 didn't [1] 5/2 differences [2] 11/17 11/22 diligently [1] 12/21 discover [1] 5/10 discovery [12] 2/13 4/9 4/14 4/15 10/21 10/22 11/4 11/6 11/15 12/9 13/16 15/17 discuss [5] 3/18 10/7 11/4 11/9 11/10 discussed [1] 13/21 discussion [2] 9/9 11/10 discussions [2] 10/12 11/16 dismissal [3] 6/11 6/14 9/8 dismissed [1] 7/2 DISTRICT [5] 1/1 1/2 1/10 16/7 16/7 diversity [3] 9/3 9/9 9/12 do [14] 4/22 4/25 5/4 5/11 6/19 7/7 7/13 8/3 8/8 11/2 12/14 13/7 15/18 15/23 documents [3] 7/16 12/10 13/20 does [1] 9/21 doesn't [2] 9/18 9/21 don't [9] 6/20 7/1 7/3 9/6 9/21 10/7 15/9 15/17 15/20 down [3] 4/6 5/2 5/12 Doyle [4] 1/20 16/6 16/13 16/13 drill [2] 5/2 5/12 due [2] 6/13 10/17 Duke [3] 13/18 13/18 13/22</p>	<p>H</p> <p>handle [1] 4/25 happy [3] 8/1 8/12 14/22 has [9] 3/21 4/11 4/16 8/5 8/18 8/22 10/11 12/11 13/19 have [44] hear [4] 5/6 5/23 13/8 15/20 hearing [1] 13/12 hears [1] 6/14 help [2] 8/6 10/25 helpful [2] 10/24 14/25 here [3] 3/14 13/25 14/19 HIPAA [1] 7/16 his [1] 5/24 home [1] 12/3 Honor [23] HONORABLE [1] 1/10 hope [1] 13/3 hopeful [2] 11/17 13/22 Hopefully [1] 5/5 how [5] 4/25 6/12 7/4 8/4 8/4 hundred [1] 3/15 hurdle [1] 9/19</p>
<p>E</p> <p>e-mail [1] 8/7 earlier [1] 13/19 EASTERN [2] 1/2 16/7 educate [2] 4/17 4/18 effort [1] 13/19 efforts [1] 11/25 either [1] 10/6 ELDON [1] 1/10 else [1] 15/11</p>	<p>F</p> <p>fact [21] fact sheet [2] 6/22 7/8 fact sheets [11] 3/24 5/24 6/18 6/20 6/24 7/1 7/3 7/13 7/15 7/18 7/21 FALLON [1] 1/10 faster [1] 11/11 FCRR [3] 1/20 16/6 16/13 FDA [1] 13/17 February [9] 10/18 10/18 10/20 11/21 12/14 12/24 13/12 15/13 15/15 February 1 [1] 10/18 February 10 [3] 10/18 11/21 12/24 February 23 [2] 10/20 15/13 February 3 [2] 12/14 13/12 federal [3] 2/14 13/24 14/3 federal/state [1] 14/3 federally [1] 9/2 felt [1] 12/12 few [2] 7/23 15/23 file [2] 12/12 15/20 filed [6] 9/3 12/13 12/17 14/12 14/13 14/14 fill [3] 6/17 6/18 7/1 Finally [1] 12/9 find [2] 5/13 10/23 Fine [1] 15/11 firms [2] 7/9 8/4 first [4] 11/20 12/23 15/21 15/21 fit [1] 9/17 fits [1] 9/21 five [1] 15/25 five-minute [1] 15/25 focused [1] 10/24 following [4] 10/19 12/11 13/6 15/16 foregoing [1] 16/8 forgot [1] 15/7 form [2] 7/22 8/19 formal [1] 10/15 forms [1] 5/18 forth [2] 10/4 10/13 forward [1] 4/20 Fritchie [1] 1/17 further [1] 10/6 future [1] 7/14</p>	<p>I</p> <p>I'm [5] 8/12 10/2 11/21 15/3 15/21 I've [1] 15/19 if [15] 4/4 6/23 7/1 8/5 8/12 9/15 9/21 9/21 10/7 10/25 11/6 14/10 14/21 14/25 15/20 IM [1] 10/5 imaging [1] 10/5 implications [1] 4/18 important [2] 6/17 6/18 importantly [1] 4/19 improvement [1] 8/2 IMS [2] 3/23 4/2 in [53] inbox [1] 8/9 INDEX [1] 2/1 individual [2] 7/10 12/3 individuals [1] 9/14 information [7] 5/18 5/21 6/22 6/23 8/20 14/4 15/3 initial [1] 9/23 inquiries [1] 8/3 instant [1] 10/5 instead [1] 14/17 Institute [1] 13/18 intelligent [1] 5/14 interested [1] 4/5 interrogatories [2] 6/20 6/21 into [2] 7/13 15/17 invest [1] 9/7 involved [1] 12/1 Irwin [3] 1/17 1/18 3/12 is [32] issue [3] 8/20 11/16 15/20 issued [2] 2/13 7/21 issues [12] 6/8 9/6 9/11 10/7 11/4 11/6 11/25 12/21 13/4 13/5 13/7 13/9 it [22] it's [9] 6/16 6/18 7/2 7/6 7/18 9/18 9/23 14/25 15/4</p>
	<p>G</p> <p>Gainsburgh [1] 1/14 Gallucci [1] 14/19 gentlemen [1] 3/4 GERALD [1] 1/15 get [3] 8/7 9/19 15/1</p>	

<p>J</p> <p>Jake [4] 5/6 5/23 7/3 7/6 JAMES [1] 1/18 Janssen [1] 3/13 January [3] 1/6 3/2 12/17 January 26 [1] 12/17 Jerry [3] 3/10 3/20 7/22 Jersey [1] 11/21 Jim [2] 3/12 15/18 joint [6] 4/8 5/17 5/22 8/19 8/23 10/14 JUDGE [5] 1/10 5/17 9/24 10/22 12/9 judges [1] 15/8 juries [1] 4/25 jurisdictional [4] 9/1 9/6 9/11 9/19 just [10] 4/5 5/25 6/17 7/7 10/1 10/2 11/7 14/8 14/23 15/23</p>	<p>MDL Centrality [1] 8/8 MDLs [1] 8/2 me [3] 5/25 14/5 14/20 means [1] 10/6 mechanical [1] 1/24 medical [1] 7/16 meet [3] 11/3 11/8 11/16 meet-and-confer [1] 11/16 meeting [1] 11/13 memo [1] 12/16 mention [3] 5/25 8/25 11/19 mentioned [1] 12/23 merits [1] 4/15 messaging [1] 10/5 met [1] 3/17 Meunier [5] 1/14 1/15 3/10 3/20 14/1 microphone [1] 3/16 mimic [1] 5/5 minute [1] 15/25 minutes [2] 7/23 15/24 moment [2] 3/17 5/6 money [1] 9/7 monitor [1] 8/8 month [2] 7/18 14/5 monthly [2] 3/14 8/11 months [1] 7/19 Moore [1] 1/17 more [1] 5/13 morning [4] 3/3 3/12 13/3 14/2 most [1] 4/19 motion [7] 6/10 6/14 10/10 10/17 12/12 12/13 13/12 motions [1] 15/17 mount [1] 14/9 move [2] 8/14 11/5 moves [1] 11/11 Mr. [4] 13/19 14/1 14/19 14/20 Mr. Davis [1] 13/19 Mr. Gallucci [1] 14/19 Mr. Meunier [1] 14/1 Mr. Weinkowitz [1] 14/20 Ms. [1] 13/25 Ms. Barrios [1] 13/25 much [2] 8/13 11/9 must [1] 10/8 my [4] 4/4 8/11 14/23 16/9</p>	<p>O</p> <p>obtain [1] 6/29 obviously [2] 4/22 6/12 Official [3] 1/20 16/6 16/14 Offentimes [1] 11/5 Okay [3] 9/13 15/11 15/25 on [35] one [7] 3/21 4/6 8/14 8/21 15/7 15/15 15/16 ones [1] 15/21 only [1] 12/6 opportunity [3] 4/24 6/5 6/21 opposing [3] 6/1 9/10 13/11 opposition [2] 12/15 12/17 or [12] 5/9 5/10 6/5 6/7 8/5 8/6 9/19 9/20 10/5 10/7 10/25 15/2 oral [4] 12/13 13/5 13/8 13/13 orally [1] 10/19 order [7] 3/18 3/21 4/1 5/3 6/11 9/25 10/15 orders [2] 3/21 4/4 Orleans [3] 1/16 1/19 1/21 Otherwise [1] 8/25 our [3] 3/14 7/18 13/3 out [10] 4/16 5/13 6/6 6/7 6/25 10/25 11/23 13/10 13/14 15/10 outside [1] 14/12 over [4] 7/10 7/16 7/19 9/19</p>
<p>K</p> <p>keep [1] 15/2 keeping [2] 5/20 10/24 kindly [1] 14/5 know [6] 4/3 4/4 9/2 12/24 13/4 15/20 knowing [2] 9/4 11/9</p>	<p>N</p> <p>names [1] 6/10 narrowing [1] 13/21 nature [1] 7/17 necessary [2] 11/1 12/12 necessity [1] 12/7 need [6] 3/25 6/22 11/25 13/23 15/1 15/23 needs [1] 8/6 new [7] 1/16 1/19 1/21 8/4 8/4 11/21 15/8 New Jersey [1] 11/21 next [8] 8/14 8/15 10/9 12/18 12/19 13/24 15/13 15/15 no [6] 3/6 12/17 14/21 14/23 15/8 15/22 not [9] 5/9 6/9 9/3 9/17 9/20 12/3 12/7 12/14 13/7 notice [1] 6/13 notices [1] 7/21 noticing [1] 11/19 notified [1] 6/4 now [9] 4/13 4/14 5/4 5/9 5/16 9/11 10/17 12/8 12/13 number [4] 5/11 12/21 13/1 14/17 numbers [3] 5/2 5/7 14/8</p>	<p>P</p> <p>p.m [2] 12/14 15/16 page [2] 2/2 14/10 part [1] 10/11 participate [1] 15/2 particular [2] 9/15 9/17 particularly [1] 15/5 parties [13] 2/13 4/14 5/12 6/21 6/23 7/24 10/12 11/3 11/11 11/15 11/22 12/20 14/6 party [1] 13/16 past [1] 5/1 pending [3] 9/12 10/10 10/17 Pennsylvania [2] 14/13 14/19 people [5] 3/15 8/4 8/8 10/3 12/5 personnel [1] 15/20 phone [3] 3/15 4/3 8/5 physicians [1] 10/11 pick [1] 5/5 place [6] 4/11 5/25 6/14 6/20 11/21 12/23 placed [1] 6/10 plaintiff [5] 5/23 6/2 6/6 6/24 7/11 plaintiffs [9] 1/14 3/11 3/20 5/20 6/12 6/17 7/1 12/2 14/17 plaintiffs' [5] 3/25 4/17 10/1 10/11 10/17 pleading [4] 9/16 9/17 9/18 9/20 pleadings [2] 8/17 9/13 please [5] 3/3 3/5 3/9 3/16 3/19 pleased [2] 4/10 11/21 point [4] 7/4 7/10 11/4 15/18 pool [2] 4/9 4/14 possible [2] 4/1 6/19 posted [1] 8/24 Poydras [3] 1/15 1/18 1/20 precipitates [1] 11/10 prejudice [1] 6/15 prepare [1] 6/22 prepared [1] 14/5 prescription [1] 4/2 presented [1] 3/18 preservation [1] 9/25 preserve [1] 10/8</p>
<p>L</p> <p>lack [1] 9/8 ladies [1] 3/3 last [5] 3/22 7/19 14/10 14/13 15/8 late [1] 6/1 lateness [1] 6/5 later [2] 9/5 12/17 law [1] 14/6 lawyers [3] 4/24 4/25 9/14 lead [2] 3/17 14/18 least [1] 9/22 let [1] 5/24 Let's [2] 8/14 15/25 letter [2] 3/23 15/10 letters [1] 4/1 LIABILITY [2] 1/4 3/7 liable [1] 7/2 liaison [3] 3/10 3/17 5/20 like [2] 5/8 14/16 litigants [1] 4/24 litigation [5] 1/4 3/7 4/11 5/6 5/15 little [1] 5/4 LLC [2] 1/14 1/17 local [1] 12/15 locations [1] 11/24 logistics [1] 11/23 logs [2] 11/15 11/18 look [2] 9/22 14/10 looking [1] 4/5 looks [1] 5/8 lot [2] 9/7 13/4 LOUISIANA [5] 1/2 1/16 1/19 1/21 16/8</p>	<p>M</p> <p>made [2] 4/16 8/22 mail [1] 8/7 make [8] 3/8 4/1 5/13 9/23 11/4 12/4 13/7 15/1 many [1] 7/4 March [2] 15/13 15/16 March 16 [1] 15/16 matter [5] 9/1 10/11 10/19 15/4 16/10 matters [2] 10/25 13/10 may [3] 3/19 9/3 9/17 MD [1] 1/4 MDL [8] 3/6 4/10 7/8 7/9 8/6 14/9 14/12 15/1 MDL Centrality [1] 7/8</p>	

<p>P</p> <p>pretrial [1] 3/21</p> <p>privilege [2] 11/15 11/18</p> <p>problem [2] 5/1 9/19</p> <p>problems [3] 6/7 12/25 13/2</p> <p>proceed [2] 4/1 4/15</p> <p>proceedings [4] 1/24 3/1 16/3 16/10</p> <p>process [7] 4/12 4/19 5/25 6/13 7/8 7/25 13/17</p> <p>production [2] 12/10 13/20</p> <p>PRODUCTS [2] 1/4 3/7</p> <p>proper [2] 8/21 9/10</p> <p>propounded [1] 12/11</p> <p>protocol [3] 12/20 12/22 13/15</p> <p>proved [1] 4/11</p> <p>provided [1] 14/6</p> <p>provides [1] 3/23</p> <p>providing [1] 8/23</p> <p>provisions [3] 4/13 10/2 10/8</p> <p>PSC [6] 4/16 4/20 6/3 8/21 9/4 12/11</p> <p>PTO [3] 3/22 5/19 10/2</p> <p>PTO 14B [1] 3/22</p> <p>PTO 4A [1] 5/19</p> <p>pull [1] 4/6</p> <p>purpose [1] 13/21</p> <p>pursuant [2] 4/13 5/19</p> <p>pursuing [1] 9/7</p> <p>put [3] 4/4 4/11 5/25</p>	<p>13/25 14/20 15/7</p> <p>reported [1] 13/19</p> <p>Reporter [3] 1/20 16/7 16/14</p> <p>represent [1] 9/14</p> <p>representative [1] 5/11</p> <p>represents [1] 5/14</p> <p>request [1] 12/10</p> <p>require [1] 13/5</p> <p>Research [1] 13/18</p> <p>resolve [2] 12/21 13/1</p> <p>resolving [4] 11/17 11/25 12/24 13/4</p> <p>resources [1] 9/7</p> <p>respect [9] 5/24 8/20 9/2 9/25 10/4 11/23 13/14 13/17 13/18</p> <p>respond [1] 8/9</p> <p>response [2] 10/17 12/12</p> <p>responsibility [1] 9/23</p> <p>responsive [2] 8/16 15/3</p> <p>return [1] 13/23</p> <p>Richmond [1] 7/7</p> <p>rise [1] 16/2</p> <p>RIVAROXABAN [1] 1/4</p> <p>Room [1] 1/20</p> <p>rules [1] 12/16</p>	<p>Sooner [2] 11/9 11/9</p> <p>sooner [1] 9/5</p> <p>sort [3] 5/15 6/19 7/5</p> <p>source [1] 13/23</p> <p>specific [2] 4/15 8/19</p> <p>stand [1] 16/1</p> <p>state [6] 2/14 5/8 13/24 14/3 14/5 14/9</p> <p>state/federal [2] 2/14 13/24</p> <p>STATES [3] 1/1 1/10 16/7</p> <p>statistics [1] 7/4</p> <p>status [8] 1/9 3/14 3/22 10/20 14/6 14/14 15/13 15/14</p> <p>stenography [1] 1/24</p> <p>still [1] 13/10</p> <p>stops [2] 11/7 11/7</p> <p>streamline [1] 13/20</p> <p>Street [3] 1/15 1/18 1/20</p> <p>subject [3] 9/1 9/8 10/12</p> <p>submit [1] 10/15</p> <p>subpoena [1] 12/3</p> <p>substantial [1] 14/9</p> <p>successful [1] 6/9</p> <p>suggestions [1] 15/2</p> <p>Suite [2] 1/15 1/18</p> <p>sure [2] 10/2 15/1</p> <p>surface [1] 9/5</p> <p>system [6] 4/11 5/18 6/3 7/10 8/2 8/4</p>
<p>Q</p> <p>question [2] 9/12 14/19</p> <p>questions [5] 8/6 8/9 8/12 9/2 14/22</p> <p>quickly [2] 6/19 8/10</p>	<p>S</p> <p>safeguards [1] 6/13</p> <p>saying [1] 15/22</p> <p>scheduling [1] 10/23</p> <p>search [1] 13/21</p> <p>seated [1] 3/3</p> <p>section [14] 1/5 5/17 8/15 8/16 8/25 9/25 10/9 10/21 11/14 11/19 12/9 12/19 12/19 13/24</p> <p>Section 10 [1] 10/21</p> <p>Section 11 [1] 12/19</p> <p>Section 8 [1] 9/25</p> <p>Sections [2] 4/7 5/22</p> <p>secure [1] 4/19</p> <p>see [1] 4/24</p> <p>seems [1] 5/18</p> <p>select [3] 4/23 5/11 7/25</p> <p>selected [2] 4/14 4/17</p> <p>selecting [1] 5/1</p> <p>selection [3] 4/8 4/18 5/14</p> <p>send [1] 14/5</p> <p>sending [1] 15/9</p> <p>sent [1] 6/25</p> <p>separate [2] 7/12 7/16</p> <p>series [1] 11/12</p> <p>serious [1] 6/12</p> <p>set [7] 4/19 10/4 10/13 12/13 14/21 15/13 15/24</p> <p>sheet [2] 6/22 7/8</p> <p>sheets [16] 3/24 5/23 5/24 6/2 6/17 6/18 6/20 6/24 6/24 7/1 7/3 7/11 7/13 7/15 7/18 7/21</p> <p>short [1] 8/19</p> <p>show [1] 6/11</p> <p>side [1] 10/3</p> <p>sides [2] 9/6 13/8</p> <p>sign [1] 3/25</p> <p>significant [1] 7/2</p> <p>simply [3] 3/24 9/4 10/1</p> <p>since [3] 3/22 14/13 15/8</p> <p>six [1] 7/19</p> <p>smoothly [2] 8/1 14/21</p> <p>so [18]</p> <p>software [1] 1/25</p> <p>solidify [1] 10/16</p> <p>some [8] 7/4 9/17 10/12 10/13 11/10 11/22 13/2 13/13</p> <p>something [1] 11/10</p>	<p>T</p> <p>take [4] 3/18 11/6 11/20 15/25</p> <p>taking [1] 12/23</p> <p>talking [1] 7/22</p> <p>telephone [2] 12/14 13/12</p> <p>telephonically [1] 11/3</p> <p>tell [1] 12/4</p> <p>template [1] 8/23</p> <p>term [1] 13/21</p> <p>text [1] 10/5</p> <p>than [2] 9/5 12/17</p> <p>Thank [3] 8/13 9/24 14/1</p> <p>that [65]</p> <p>that's [3] 5/15 7/18 8/11</p> <p>their [6] 3/8 4/20 5/20 7/1 10/3 12/3</p> <p>them [12] 3/25 4/5 4/17 4/18 4/20 6/25 11/8 11/12 11/13 14/13 14/22 14/24</p> <p>themselves [1] 7/20</p> <p>then [10] 5/12 5/13 6/5 6/10 6/22 6/23 7/1 8/19 9/21 16/1</p> <p>there [16] 3/21 6/4 7/12 8/12 9/1 9/3 9/12 10/4 11/22 12/5 13/5 13/9 14/12 14/14 14/15 15/8</p> <p>there's [3] 12/16 12/24 14/21</p> <p>therefore [1] 8/22</p> <p>these [5] 4/4 5/5 9/14 11/5 12/25</p> <p>they [4] 6/22 12/4 14/20 14/22</p> <p>thing [3] 7/2 7/5 15/8</p> <p>things [2] 5/15 7/17</p> <p>think [11] 7/22 8/1 9/9 9/22 11/11 12/16 12/21 13/9 14/25 15/4 15/12</p> <p>third [3] 2/13 12/10 13/16</p> <p>third-party [1] 13/16</p> <p>this [16] 4/11 4/12 6/19 7/4 7/10 8/25 9/20 10/7 10/11 11/12 11/14 11/19 12/22 13/3 15/4 15/18</p> <p>those [22]</p> <p>though [1] 13/4</p> <p>time [4] 9/7 11/5 12/24 13/13</p> <p>today [3] 3/14 13/4 13/6</p> <p>told [1] 13/2</p> <p>Toni [4] 1/20 16/6 16/13 16/13</p> <p>tool [1] 4/12</p> <p>total [1] 14/11</p> <p>touch [1] 15/2</p>
<p>R</p> <p>raised [1] 6/8</p> <p>raising [1] 9/11</p> <p>random [1] 5/4</p> <p>rather [1] 9/5</p> <p>RE [2] 1/4 3/6</p> <p>reach [1] 6/6</p> <p>reached [1] 4/16</p> <p>Realizing [1] 6/12</p> <p>receive [2] 7/13 8/3</p> <p>received [2] 7/11 7/15</p> <p>receiving [1] 7/17</p> <p>recess [1] 16/1</p> <p>record [2] 3/9 16/10</p> <p>recorded [1] 1/24</p> <p>records [2] 7/12 7/16</p> <p>reference [1] 12/10</p> <p>references [1] 11/15</p> <p>reflect [1] 8/22</p> <p>refrain [2] 10/6 10/7</p> <p>regard [2] 6/7 7/3</p> <p>regarded [1] 12/7</p> <p>regarding [2] 6/1 10/10</p> <p>register [1] 8/5</p> <p>registered [1] 7/9</p> <p>regular [1] 8/3</p> <p>reinforce [1] 6/16</p> <p>Relates [1] 1/6</p> <p>release [2] 3/23 4/2</p> <p>rely [1] 6/13</p> <p>remain [1] 13/2</p> <p>remaining [1] 13/9</p> <p>remains [1] 15/12</p> <p>remind [2] 3/24 9/14</p> <p>reminded [1] 10/3</p> <p>reply [1] 10/18</p> <p>report [16] 4/8 4/10 5/17 5/22 5/24 7/8 8/1 8/11 8/16 10/14 11/14 11/21 12/19</p>		

<p>T train [1] 11/7 transcript [1] 16/9 transcription [1] 1/25 trial [1] 14/21 tried [2] 4/23 11/2 true [1] 16/8 try [3] 6/6 6/19 10/25 trying [3] 4/22 5/4 5/10 Tuesday [1] 12/18 Tusa [4] 1/20 16/6 16/13 16/13 two [2] 11/3 11/8</p>	<p>work [6] 6/7 10/25 13/3 13/11 13/14 13/22 worked [3] 7/24 11/23 12/21 working [2] 5/19 13/10 works [1] 4/20 worry [1] 15/9 would [4] 8/25 13/11 14/10 14/16</p> <hr/> <p>X</p> <hr/> <p>XARELTO [3] 1/4 3/6 14/16</p> <hr/> <p>Y</p> <p>Yes [1] 12/6 yet [1] 12/15 you [28] you're [1] 9/22 your [33] Your Honor [18]</p>
<p>U under [3] 10/8 11/6 12/15 understand [1] 12/2 understanding [1] 16/9 union [1] 5/9 UNITED [3] 1/1 1/10 16/7 unresolved [1] 13/2 up [2] 4/19 15/24 updated [2] 5/20 8/23 uploaded [1] 7/20 upon [2] 6/13 14/4 urgency [1] 12/24 Urquhart [1] 1/17 us [8] 7/4 8/7 8/7 10/22 10/24 13/11 13/22 15/21 use [8] 3/16 6/20 6/20 8/4 8/18 9/15 9/21 10/6 useful [1] 4/12 users [3] 7/10 14/16 14/16 using [3] 1/24 4/12 9/22</p>	
<p>V various [1] 4/25 very [6] 4/12 7/25 8/9 8/13 14/25 15/3 Virginia [1] 7/7 voicemails [1] 10/5</p>	
<p>W want [4] 3/24 11/8 14/23 15/20 wanted [1] 10/1 Warshauer [1] 1/14 was [3] 5/3 7/22 8/1 way [3] 8/6 9/10 11/12 we [71] website [3] 4/4 4/6 8/24 weeks [2] 11/3 11/8 weigh [1] 6/24 Weinkowitz [1] 14/20 welcome [1] 9/22 well [1] 10/23 went [1] 7/25 were [2] 11/22 11/22 what [10] 4/22 4/24 5/4 5/10 6/22 7/22 8/25 11/2 13/23 15/12 what's [1] 5/3 whatever [3] 6/7 13/14 15/2 when [1] 12/7 where [1] 13/9 whether [1] 9/20 which [11] 3/23 6/4 9/3 9/11 9/12 10/5 10/13 10/21 12/17 13/5 13/7 who [2] 8/8 9/14 why [2] 7/3 15/17 will [16] 3/18 4/14 5/6 7/22 10/15 10/18 10/19 11/13 12/17 13/5 13/8 13/10 13/22 13/22 15/1 16/1 without [2] 10/25 11/25 won't [1] 11/9 Woody [3] 5/7 5/24 7/6</p>	