

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

(609) 989-2182

CHAMBERS OF
FREDA L. WOLFSON
UNITED STATES DISTRICT JUDGE

Clarkson S. Fisher Federal Building
& U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

May 22, 2013

TO ALL COUNSEL

**RE: In Re: Plavix Product Liability and Marketing Litigation
Civil Action No. 13-2418 (FLW)(TJB), MDL2418**

Dear Counsel:

The above-referenced MDL proceeding has been initiated by Multidistrict Litigation Panel on February 12, 2013. There are currently sixteen (16) active member cases associated with this proceeding, with additional cases to be transferred. With respect to each of these matters, I am aware that there are various motions pending in some of the cases and other housekeeping issues to address. In that regard, in order to better acquaint myself with counsel and the status of these individual cases, I am scheduling an in-person Organizational Conference on June 10, 2013 at 1:30 p.m., wherein all counsel are directed to attend.

In advance of this Conference, I am also directing counsel to submit a Status Report by *no later than June 7, 2013*, for the case(s) you are handling. In that Report, please address the following:

1. Whether any discovery has taken place, and if so, at what stage is discovery pending;
2. Whether the parties have discussed settlement, and whether those discussions are ongoing;
3. What, if any, motions are pending before this Court, or motions that have been decided by the transferor judge;
4. Suggestions regarding lead/liaison counsel; and
4. Propose any agenda items that may be discussed during the Organizational Conference.

In addition to a status report, all counsel are required to confer with one another and submit a proposed initial case-management order *by no later than June 7, 2013*. Counsel should make every effort to agree on all dates. Any disputes should be brought to my attention during the Conference. The proposed order may address the following matters:

1. Deadlines for joinder of parties, amendment of pleadings, filing of motions, and completion of discovery;
2. Modifications to the time set by Rule 26(a)(1) for initial disclosures and setting dates for its supplementation under Rule 26(e)(1);
3. A schedule for amending discovery responses as required by Rule 26(e)(2);
4. Dates for future conferences and, if bellwether trials are planned, the final pretrial conferences and trials; and
5. Any other matters appropriate in the circumstances of this proceeding.

The Hon. Tonianne J. Bongiovanni, U.S.M.J., will also be joining me in presiding over the Conference, and as such, please send Judge Bongiovanni all reports and the proposed case-management order in advance of the Conference.

I look forward to meeting all of you.

Sincerely yours,

/s/ Freda L. Wolfson
FREDA L. WOLFSON
United States District Judge