

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| IN RE: ZOLOFT (SERTRALINE HYDROCHLORIDE) PRODUCTS LIABILITY LITIGATION | : | MDL NO. 2342 12-MD-2342 |
| <hr/> | : | HON. CYNTHIA M. RUFÉ |
| THIS DOCUMENT RELATES TO: ALL ACTIONS | : | |
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**JOINT [PROPOSED] AGENDA FOR INITIAL STATUS CONFERENCE
ON JULY 12, 2012**

I. Overview of Litigation

A. Number and Nature of Cases

1. Current and anticipated volume
2. Categories of cases
3. No class actions/class allegations

B. Leadership Roles and Responsibilities

C. State Court Litigations

1. PCCP
2. Missouri
3. Illinois
4. New York

D. State-Federal Coordination

1. Depositions
2. Documents

E. Pending Motions

1. Remand motions
2. Motions to dismiss

II. Joint Proposed Case Management Order

III. Pleadings

A. Direct Filing

B. Master Complaint/Answer; Short-Form Complaint

1. Schedule for filing and responding
2. Form of short-form complaint
3. Further amendment

IV. Discovery Plan

A. Status of Discussions/Draft Joint Plan and Schedule

1. Protective Order
2. Plaintiffs' Fact Sheet
3. Authorizations
4. Initial Disclosures
5. Documents and e-discovery
 - (a) Protocols
 - (b) Phasing
 - (c) Cost-sharing
6. Depositions: protocols for noticing, cross-noticing, and scheduling
7. Discovery motion practice

B. Case-Specific Discovery

V. Regular Conferences

A. Day and Time

B. Joint Agenda in Advance

C. Attendance and Telephonic Participation

Dated: June 22, 2012

Respectfully submitted
MELLON & WEBSTER, P.C.

/s/ Stephen A. Corr

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LLC and Defendants' Interim Liaison
Counsel

CERTIFICATE OF SERVICE

I hereby certify that, on June 22, 2012, I caused a true and correct copy of the foregoing JOINT [PROPOSED] AGENDA FOR INITIAL STATUS CONFERENCE ON JULY 12, 2012 to be served this day via the Court's CM/ECF filing system.

/s/ Mark S. Cheffo
Mark S. Cheffo