

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

IN RE: LIPITOR (ATORVASTATIN)	
CALCIUM) MARKETING, SALES)	MDL No. 2:14-mn-02502-RMG
PRACTICES AND PRODUCTS)	
LIABILITY LITIGATION)	PROPOSED ADDITIONAL AGENDA
)	ITEMS
)	
)	This Document Relates to All Actions.
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PROPOSED ADDITIONAL AGENDA ITEMS

Pursuant to the Court’s CMO No. 1, undersigned counsel for certain plaintiffs in this MDL respectfully requests the following additional items be included on the agenda for the initial status conference:

1. Adoption of the South Carolina Plaintiffs’ Interrogatories and Requests for Production to Pfizer and Pfizer's Answers and Responses thereto;
2. Adoption of this Court's prior Orders and any agreements between Pfizer and the South Carolina Plaintiffs regarding discovery of Pfizer;
3. Adoption of any case-specific discovery provided by Plaintiffs to Pfizer so that the parties will not need to duplicate any individual discovery which has already taken place and discussion of the nature and extent of case-specific discovery in the future; and
4. The resolution by this Court of several outstanding discovery issues that arose prior to consolidation between Pfizer and the South Carolina Plaintiffs.

RESPECTFULLY SUBMITTED,

On March 12, 2014

By: s/ H. Blair Hahn

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CERTIFICATE OF SERVICE

I hereby certify that, this 12th day of March 2014, I electronically filed a copy of the above and foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

By: s/ H. Blair Hahn