

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

In re BIOMET M2A MANGUM HIP IMPLANT PRODUCTS LIABILITY LITIGATION)))))	CAUSE NO. 3:12-md-02391-RLM-CAN (MDL-2391) ----- THIS DOCUMENT RELATES TO: ALL CASES
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JOINT STIPULATION TO DISMISS NON-REVISION CASES

Plaintiffs and Defendants Biomet, Inc., Biomet Orthopedics, LLC, Biomet U.S. Reconstruction, LLC and Biomet Manufacturing, LLC (herein after collectively referred to as “Defendants”) by and through their respective Co-Lead counsel, hereby jointly stipulate to the dismissal of all cases on the non-revision list. In support their stipulation, the parties state as follows:

1. The parties have identified 388 cases that have been filed in the MDL that have been stayed as non-revision cases and in which there is no pending motion to lift the non-revision stay. *See* Exhibit A, List of Stayed Non-Revision Cases as of September 12, 2014.

2. Pursuant to Paragraph 8 of the parties’ January 31, 2014 Master Settlement Agreement (Doc. No. 1317), and this Court’s December 10, 2013 and February 3, 2014 Orders (Doc. Nos. 1117, 1316), all cases on the non-revision list will be dismissed without prejudice on or before September 12, 2014.

WHEREFORE, the parties hereby respectfully request that the Court dismiss all non-revision cases stayed as of September 12, 2014, identified on Exhibit A, without prejudice.

DATED: September 12, 2014

Respectfully submitted,

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EXHIBIT A

Cause Number
3:12-cv-00635-RLM-CAN
3:12-cv-00636-RLM-CAN
3:12-cv-00639-RLM-CAN
3:12-cv-00661-RLM-CAN
3:12-cv-00666-RLM-CAN
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3:12-cv-00707-RLM-CAN
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