

1 Ernest Cory (*Admitted Pro Hac Vice*)
2 Alabama Bar No.: asb-2279-y83e
3 CORY WATSON, P.C.
4 2131 Magnolia Avenue South
5 Birmingham, AL 35205
6 Telephone: (205) 328-2200
7 Facsimile: (205) 324-7896
8 Email: ecory@corywatson.com

Proposed Lead Counsel for Plaintiffs
[Parties Represented Appear on Signature Page]

7 Joseph G. Petrosinelli (*Admitted Pro Hac Vice*)
8 District of Columbia Bar No.: 434280
9 WILLIAMS AND CONNOLLY LLP
10 725 12th Street NW
11 Washington, DC 20005
12 Telephone: (202) 434-5000
13 Facsimile: (202) 434-5029
14 Email: jpetrosinelli@wc.com

Lead Counsel for Defendant, Pfizer, Inc.

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **(SAN FRANCISCO DIVISION)**

15 **In re:**
16 **VIAGRA (SILDENAFIL CITRATE)**
17 **PRODUCTS LIABILITY LITIGATION**

Master File No.: 3:16-md-02691-RS

PROPOSED JOINT AGENDA FOR
INITIAL CONFERENCE ON JUNE 15,
2016, 10:00 A.M.

19 This Document Relates to: ALL ACTIONS

23 Pursuant to Pretrial Order 1, the parties jointly submit this proposed agenda for the
24 conference scheduled for June 15, 2016. The parties propose that the Court consider the
25 following agenda items at the conference.

- 26 1. Appointment of Leadership Counsel.
27 a. Parties' recommendation and Court approval of Liaison Counsel.
28

b. Consideration of Plaintiffs’ Proposed Leadership Structure.

- 2. Overview. A report by the parties regarding the status of the litigation in both federal and state courts, including efforts to coordinate the litigation between federal and state courts.
- 3. Confidentiality Agreement and Protective Order. Direction from the Court with respect to the parties’ joint proposed confidentiality agreement and protective order.
- 4. MDL 2691 Website. Court’s consideration and/or direction to the parties regarding the creation of a website for MDL 2691.
- 5. Master Consolidated Complaint, Short Form Complaint, and Direct Filing Order.
- 6. Discovery. Direction from the Court with respect to the parties’ proposed discovery plan.

Respectfully submitted,

Dated: May 9, 2016.

CORY WATSON, P.C

/s/ Ernest Cory
Ernest Cory (*Admitted Pro Hac Vice*)
Alabama Bar No.: asb-2279-y83e
CORY WATSON, P.C.
2131 Magnolia Avenue South
Birmingham, AL 35205
Telephone: (205) 328-2200
Facsimile: (205) 324-7896
Email: ecory@corywatson.com

Proposed Lead Counsel for Plaintiffs, Counsel for Plaintiffs, Lennart “Lenny” Anderson, Dennis Andrews, Joseph Barnes, Thomas Brownfield, Charles Christensen, Stephen Crossland, Joao Delgado, Ronnie Griffith, Terrence Hayes, Amador Herrera, Willard Hoffman, Joe Holley, Kenneth Jansen, Jr., Edwin Kelly, Larry Maddux, Sr., Lyle Maxey, James Mulvaney, Paul O’Malley, John Reinwald, Estate of Lloyd Rosenwein, Michael Smith, Ronald Willoughby

1 Dated: May 9, 2016.

WILLIAMS AND CONNOLLY LLP

2 /s/ Joseph G. Petrosinelli
3 Joseph G. Petrosinelli (*Admitted Pro Hac Vice*)
4 District of Columbia Bar No.: 434280
5 WILLIAMS AND CONNOLLY LLP
6 725 12th Street NW
7 Washington, DC 20005
8 Telephone: (202) 434-5000
9 Facsimile: (202) 434-5029
10 Email: jpetrosinelli@wc.com

11 *Lead Counsel for Defendant, Pfizer, Inc.*

12 **ATTESTATION PURSUANT TO CIVIL L.R. 5.1(i)(3)**

13 I, Ernest Cory, hereby attest that concurrence in the filing of this document has been
14 obtained from the other signatory.

15 Dated: May 9, 2016.

16 /s/ Ernest Cory
17 Ernest Cory

CERTIFICATE OF SERVICE

I, Ernest Cory, hereby certify that on this 9th day of May, 2016, I electronically filed the foregoing with the Court using the CM/ECF system and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Ernest Cory

Ernest Cory