

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: TESTOSTERONE REPLACEMENT THERAPY  
PRODUCTS LIABILITY LITIGATION

MDL No. 2545

Master Case No. 1:14-cv-1748

Honorable Matthew F. Kennelly

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*This document applies to all cases.*

**PSC’S MOTION TO COMPEL PRODUCTION  
OF DOCUMENTS RELATING TO ABBVIE’S DRUG SAFETY FILES**

The Plaintiffs’ Steering Committee (“PSC”) hereby moves, pursuant to Rule 37 of Federal Rules of Civil Procedure, for an Order compelling Defendants AbbVie Inc. and Abbott Laboratories (collectively, “AbbVie”) to produce the full drug safety and investigation files for 269 adverse events. The grounds for this Motion are set forth in the Memorandum of Law in Support of the PSC’s Motion to Compel Production of Documents Relating to AbbVie’s Drug Safety Files, filed contemporaneously herewith. The PSC and AbbVie have stipulated that AbbVie’s opposition is due on or before June 13, 2016 and the PSC’s reply is due on or before June 20, 2016.

Dated: May 27, 2016

Respectfully submitted,

/s/ Trent B. Miracle

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2016, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all parties by operation of this Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Trent B. Miracle

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