

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK DIVISION**

**IN RE: PROTON-PUMP INHIBITOR
PRODUCTS LIABILITY LITIGATION
(No. II)**

: Civil Action No. 2:17-md-2789 (CCC) (MF)
: MDL No. 2789
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:
:
: THIS DOCUMENT RELATES TO:
: ALL ACTIONS
:

STIPULATION REGARDING TOLLING OF STATUTES OF LIMITATIONS

1. Scope and Purpose of Stipulation. This Stipulation establishes a process for Plaintiffs' counsel to provide certain information about individuals who allege they took a proton pump inhibitor ("PPI") and suffered a kidney injury as a result (collectively, "the PPI Users," who are asserting "PPI Personal Injury Claims") so that Plaintiffs' counsel has additional time to investigate the factual basis for such claims, including which PPI(s) the PPI Users ingested and against which Defendant(s) the PPI Users may wish to assert their PPI Personal Injury Claims. The undersigned Defendants ("Participating Defendants") are entering into this Stipulation voluntarily and as the product of negotiations with Plaintiffs' counsel given what is known (and not known) about the usage of PPIs and the filings to date in these MDL proceedings and in related state court litigations.

2. Information Provided. Plaintiffs' counsel who elects to submit a PPI User on the Tolling List must email ppitollingform@weitzlux.com to receive the fillable tolling form then submit a complete list of their cases to ppitollinglist@weitzlux.com at least 24 hours prior to the monthly deadline. As a prerequisite condition for commencing tolling pursuant to Section 3, on the last Tuesday of every month, starting with Tuesday, July 31, 2018, the Plaintiffs' Steering

Committee (“PSC”) will provide to the Participating Defendants an Excel spreadsheet (“the Tolling List”) with the following information, with a separate row for each PPI User.

- a. Name of PPI User. The full name (in the format “Last Name, First Name”) of the PPI User asserting a PPI Personal Injury Claim;
- b. Date of Birth of PPI User. The PPI User’s date of birth (in the format “YYYY-MM-DD”);
- c. Name(s) of Derivative PPI Claimants. The full name(s) (in the format “Last Name, First Name”) of any individual who is asserting injuries derived from the PPI User’s PPI Personal Injury Claim, such as an individual asserting a loss of consortium claim or asserting claims as a representative or beneficiary of an estate (“a Derivative PPI Claimant,” and together with the PPI Users, “the PPI Claimants”);
- d. Residence Information. The current city and state of residence of the PPI User (if the PPI User is alive) or the city and state of residence of the PPI User at the time of his or her death (if the PPI User is deceased) (in two separate columns for the city and the state, which shall list the state abbreviation);
- e. First Date of PPI Use. The PPI User’s approximate first date of use of any PPI (in the format “YYYY-MM-DD”);
- f. Last Date of PPI Use. The PPI User’s approximate last date of use of any PPI (in the format “YYYY-MM-DD”);
- g. Alleged Injury. The PPI User’s alleged kidney injury; and
- h. PPI Claimants’ Counsel. The law firm representing the PPI User and the Derivative PPI Claimant(s) relating to that User.

2.1 **Resolving Disputes Under Section 2.** If any Defendant believes that the information provided by a PPI User pursuant to Section 2 is incomplete and/or inadequate with respect to substantive information (i.e., excluding typographical errors and omissions), that Defendant shall raise the perceived inadequacy/incompleteness with the PPI User's counsel. If the PPI User's counsel disagrees and believes the information provided pursuant to Section 2 is complete and/or adequate, the parties shall meet and confer and try to resolve the issue and, if the issue cannot be resolved through the meet and confer process, bring the issue to the Court to resolve the disagreement. To the extent it is determined that information provided pursuant to this Section 2 is complete and/or adequate, then the PPI User's rights or benefits (including without limitation tolling of the applicable statute of limitation) arising from this Stipulation will commence based on the date the PPI User was added to the Tolling List in accordance with Section 3. However, to the extent it is determined by the Court that the information provided pursuant to Section 2 is incomplete and/or inaccurate with respect to substantive information, and thereby prejudicial to Defendants, then the PPI User's rights and benefits (including without limitation tolling of the applicable statute of limitation) arising from this Stipulation will not commence until the PPI User cures any identified substantive deficiencies and/or inadequacies.

3. **Commencement of Tolling.** The date on which a PPI Claimant's claim will start to be tolled ("the Commencement Date") is set forth below:

a. **PPI Claimants Identified on First Tolling List.** For PPI Claimants identified on the first Tolling List of July 31, 2018 (except those identified below with earlier tolling dates), those PPI Claimants' PPI Personal Injury Claims will be tolled as of April 16, 2018, assuming those plaintiffs retained their counsel on or before April 16, 2018. For those

plaintiffs who retained counsel after April 16, 2018, tolling will be the date they retained counsel.

b. PPI Claimants Identified on Subsequent Tolling Lists. For PPI Claimants identified on subsequent Tolling Lists, those PPI Claimants' PPI Personal Injury Claims will be tolled as of the date on which the PSC transmits the Tolling List.

c. Certain PPI Claimants with Cases Currently Pending in Federal or State Court. The PPI Claimants listed in Exhibits A through C to this Stipulation have cases currently pending in: (1) state courts ("the State Court PPI Plaintiffs"), who are listed in Exhibit A; (2) federal court, in which multiple PPI Users were named as plaintiffs in a single complaint, who are listed in Exhibit B ("the Multi-Plaintiff Complaint PPI Claimants"); (3) federal court, in which a single PPI User filed a complaint, who are listed in Exhibit C ("the Exhibit C Plaintiffs"), which will be filed as a supplement to this Tolling Agreement on or before June 29, 2018.

i. Dismissals Without Prejudice. The PPI Claimants listed in Exhibits A through C will dismiss their cases without prejudice within 21 days of the entry of this Stipulation and will be included on the first Tolling List.¹

ii. Potential Reinstatement of Certain Federal PPI Plaintiffs' Claims Without Payment of Additional Filing Fee. Any Plaintiff who re-files his or her lawsuit after complying with the requirements of Paragraph 6 shall be entitled to reinstatement of his or her complaint without paying a new or additional filing fee. Any Multi-Plaintiff Complaint PPI Claimant who re-files his or her lawsuit after complying with the requirements of Paragraph 6

¹ Should any mistakes be identified with respect to Exhibits A – C, the parties will make a good faith effort to resolve such issues regarding dismissals, if necessary, in a timely manner.

will be required to obtain an individual case number and shall be required to pay a filing fee, except for the first named plaintiff in each such complaint.

iii. Commencement of Tolling. The PPI Personal Injury Claims asserted by the PPI Claimants listed in Exhibits A through C will be tolled as of the date the respective Claimants filed their cases in state or federal court.

4. Expiration of Tolling. Absent agreement of the PPI Claimants and all of the Participating Defendants (collectively, “the Parties”), tolling pursuant to this Stipulation shall expire on January 31, 2019 (“the Expiration Date”). For the State Court PPI Plaintiffs, the Expiration Date shall be May 31, 2019.

5. Effect of Tolling.

a. Tolling of Statutes of Limitations. For any PPI Claimant included on a Tolling List, those PPI Claimants’ PPI Personal Injury Claims against the Participating Defendants shall be tolled from the Commencement Date to the Expiration Date unless a different date is agreed to by the Parties.

b. No Revival of PPI Personal Injury Claims. This Stipulation is not intended to waive, and does not constitute a waiver of, any legal or equitable defense based on the passage of time that might be relied upon by the Participating Defendants in defending an action by the PPI Claimants, including but not limited to any statute of limitations, statute of repose, the doctrine of laches, waiver, estoppel, or any other defense existing prior to the respective Commencement Date. Similarly, this Agreement shall not revive existing claims, if any, that expired under the applicable statutes of limitations prior to the Commencement Date.

c. No Extension of Statutes of Limitation After Expiration Date. The running of all applicable statutes of limitations shall resume upon the Expiration Date (*i.e.*, on

January 31, 2019, and on May 31, 2019 for the State Court Plaintiffs, absent agreement of the Parties). The applicable statute of limitations shall not be extended for the length of time that a PPI Claimant's claim was subject to tolling. For example, if a PPI Claimant's statute of limitations would expire on January 2, 2019 absent this Stipulation, that PPI Claimant would have until January 31, 2019 to file a complaint; otherwise, the PPI Claimant's claim would be time-barred (*i.e.*, the PPI Claimant has until the Expiration Date to file his or her lawsuit if the applicable statute of limitations otherwise would have expired during the period of time that the PPI Claimants' claim was subject to tolling; the PPI Claimant's statute of limitations is not extended by the number of months that the PPI Claimant's claim was tolled). If a PPI Claimant's statute of limitations would expire on March 1, 2019 absent this Stipulation, that PPI Claimant would have until March 1, 2019 to file a complaint; otherwise, the PPI Claimant's claim would be time-barred. If a PPI Claimant's statute of limitations already has expired prior to the entry of this Stipulation, the claim remains time-barred and is not revived by this Stipulation.

6. Following Expiration of Tolling. Any PPI Claimant who is listed on a Tolling List who subsequently decides to file a lawsuit must do the following:

a. Evidence of Use and Evidence of Injury. Within 7 business days of filing a Complaint, each PPI User (and affiliated Derivative PPI Claimants) must provide to counsel of record for each Participating Defendant against whom the PPI Claimants have asserted claims specific evidence of use and proof of injury, as described below. For purposes of this section, "specific" evidence shall mean copies of specific page(s) of medical or other records (not to exceed 50 pages per PPI User, absent good cause), not general references to voluminous medical records.

i. Use. Specific pharmacy, insurance, medical or other reliable records demonstrating that the PPI User ingested a PPI manufactured or sold by that Defendant; provided, however, that if a PPI User is unable, after a good faith effort, to procure pharmacy, insurance, medical, or other records (such as receipts) demonstrating the specific PPI use, the PPI User may provide an affidavit identifying, at a minimum: (1) the specific PPI(s) the PPI User took; (2) the approximate date(s) he or she took the PPI(s) (and dates of use for each PPI used, if more than one); (3) the pharmacy or other store where the PPI User obtained the PPI; (4) what efforts the PPI Claimant made to locate evidence of use and (5) the reason why, despite being unable to locate supporting documentation, the plaintiff believes s/he ingested the identified product; and

ii. Injury. Specific medical records demonstrating that the PPI User was diagnosed with or received treatment for a kidney injury, following ingestion of a PPI.

b. Expedited Plaintiff Fact Sheets & Other Documents. By April 1, 2019 (or any such later date as agreed to by the Parties), each PPI User (and affiliated Derivative PPI Claimants) must provide to counsel of record for each Participating Defendant against whom the PPI Claimants have asserted claims a Plaintiff Fact Sheet (Dkt. 119-1), authorizations, medical records, and other documents, as required by MDL Case Management Order No. 9 (“the CMO 9 Material”) (Dkt. 119). Such deadline shall apply irrespective of whether any named Defendant has answered the complaint. For the State Court Plaintiffs, the expedited CMO 9 Material shall be due on July 10, 2019. If a PPI Claimant files a lawsuit in the MDL and that PPI Claimant’s CMO 9 Material would be due sooner than April 1, 2019 under CMO 9, the earlier deadline shall apply.

c. Filing Restrictions: Number of PPI Users and Format of Complaint. With the exception of PPI Claimants listed in Exhibit A, the PPI Claimants only may file federal court complaints alleging PPI Personal Injury Claims on behalf of a single PPI User and any Derivative PPI Claimants related to the PPI User. In other words, there may be no more than one PPI User named in any federal court complaint or any state court complaint other than PPI Claimants listed in Exhibit A to the extent allowed by state law and/or practice. Additionally, complaints must name only those specific Defendants against which Plaintiff(s) in good faith believe they have a valid claim.

d. Filing Restrictions: Forum. The PPI Claimants only may file complaints in federal court and may not oppose transfer to the MDL (or may file directly in the MDL, pursuant to the Direct Filing Order), unless the PPI User is a resident of a state in which a federal court would lack diversity jurisdiction. In such an event, the PPI Claimant still must satisfy the other requirements in this Paragraph 6. Additionally, complaints must name only those specific Defendants against which Plaintiff(s) in good faith believe they have a valid claim. All PPI Claimants who are subject to this Stipulation, including those who may file any PPI Personal Injury Claims in state court (because a federal court would lack diversity jurisdiction) following the expiration of this Stipulation, hereby consent to the requirements and procedures in this Stipulation.

e. Date of Retention. For any PPI Claimant who does not satisfy the requirements in Paragraphs 6.a through 6.d, the PPI Claimants must provide to counsel of record for each Participating Defendant against whom the PPI Claimants have asserted claims the date on which the PPI Claimants first retained Plaintiffs' Counsel ("the retention date") within 5

business days of notice by any Participating Defendant that the PPI Claimant has not complied with any of those requirements.

7. Effect of Failure to Satisfy Conditions in Paragraph 6. Any PPI Claimant who files a complaint and it is determined that the claimant did not satisfy the conditions required in Paragraph 6 by the applicable deadlines shall be subject to the following:

a. Tolling Void. The tolling of any PPI Personal Injury Claims for such PPI Claimants will be void. In other words, the operative filing date will be the date the PPI Claimant files his or her complaint, not the Commencement Date under this Stipulation, and the applicable statutes of limitation will not have been tolled.

b. Immediate Dismissal. The PPI Claimants' complaint shall be subject to an immediate motion to dismiss, without any requirement for meeting and conferring under the applicable state or federal rules, including any local rule, though Defendants must have a good faith basis for such a motion. For any motion(s) to dismiss based on the evidence of use and injury submitted within 7 business days after filing a complaint, Defendants shall not challenge the adequacy (*i.e.*, the qualitative reliability) of the record(s) as a basis for moving to dismiss, but may move immediately where no evidence of use or injury is provided.

8. Efforts to Collect Records. On the last business day of each quarter prior to the Expiration Date, each Plaintiffs' firm with any PPI Claimants subject to this Stipulation shall provide a report of each Plaintiffs' counsel's efforts to obtain medical records for their PPI Claimants. Such report shall include: (a) the dates of all medical record requests to date; and (b) the identity of the providers whose records were requested. Such report shall be transmitted to Defendants by uploading them to a global ShareFile site that counsel for all parties can access

maintained by The Marker Group at <https://tmg-data.com/> (see Exhibit J to Case Management Order No. 9 (Doc. 119-10) for specific access instructions).

IT IS SO STIPULATED, this 26th day of June 2018.

FOR PLAINTIFFS:

/s/ Christopher A. Seeger
Christopher A. Seeger
(Co-Lead Counsel)
Seeger Weiss, LLP
550 Broad Street, Suite 920
Newark, NJ 07102
(973) 639-9100
cseeger@seegerweiss.com

/s/ Stephanie O'Connor
Stephanie O'Connor
(Co-Lead Counsel)
Douglas & London, P.C.
59 Maiden Lane, 6th Floor
New York, NY 10038
(212) 566-7500
soconnor@douglasandlondon.com

/s/ Paul J. Pennock
Paul J. Pennock
(PEC Co-Chair)
Weitz & Luxenberg P.C.
700 Broadway
New York, NY 10003-9536
P: (212)-558-5500
ppennock@weitzlux.com

/s/ Neil D. Overholtz
Neil D. Overholtz
(PEC Co-Chair)
Aylstock, Witkin, Kreis & Overholtz, PLLC
17 E. Main Street, Suite 200
Pensacola, FL 32502
P: (850) 202-1010
noverholtz@awkolaw.com

*On Behalf of Plaintiffs' Executive and Steering
Committees*

FOR DEFENDANTS:

/s/ Gregory Hindy
Gregory Hindy
Debra M. Perry
MCCARTER & ENGLISH LLP
Four Gateway Center, 100 Mulberry Street
Newark, New Jersey 07101-0652
T: (973) 622-4444
F: (973) 624-7070
ghindy@mccarter.com
dperry@mccarter.com

*Attorneys for Defendants AstraZeneca
Pharmaceuticals LP, AstraZeneca LP, and
Merck Sharp and Dohme Corporation*

/s/ Arthur E. Brown
Arthur E. Brown
Alan E. Rothman
ARNOLD & PORTER
KAYE SCHOLER LLP
250 West 55th Street
New York, NY 10019-9710
T: (212) 836-8000
F: (212) 836-8689
arthur.brown@apks.com
alan.rothman@apks.com

/s/ Matthew Douglas
Matthew Douglas
ARNOLD & PORTER
KAYE SCHOLER LLP
370 Seventeenth Street, Suite 4400
Denver, CO 80202-1370
T: (303) 863-1000
F: (303) 832-0428
Matthew.Douglas@apks.com

*Attorneys for Defendants AstraZeneca
Pharmaceuticals LP and AstraZeneca LP*

/s/ Amy K. Fisher

Amy K. Fisher
Katherine Althoff
John Camp
ICE MILLER LLP
One American Square, Suite 2900
Indianapolis, IN 46282
T: (317) 236-2100
F: (317) 592-5443
amy.fisher@icemiller.com
katherine.althoff@icemiller.com
john.camp@icemiller.com

/s/ Makenzie Windfelder

Makenzie Windfelder
James J. Freebery
MCCARTER & ENGLISH LLP
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, DE 19801
T: (302) 984-6300
F: (302) 984-6399
mwindfelder@mccarter.com
jfreebery@mccarter.com

*Attorneys for Defendants AstraZeneca
Pharmaceuticals LP, AstraZeneca LP, Merck
Sharp and Dohme Corporation, and McKesson
Corporation*

/s/ Craig A. Thompson

Craig A. Thompson
Jason C. Rose
VENABLE LLP
750 E. Pratt Street, Suite 900
Baltimore, Maryland 21202
Phone: (410) 244-7400
Facsimile: (410) 244-7742
cathompson@venable.com
jcrose@venable.com

/s/ Sherry A. Knutson

Sherry A. Knutson
James R. M. Hemmings
TUCKER ELLIS LLP
223 South Wacker Drive, Suite 6950
Chicago, IL 60606
Phone: (312) 624-6300
Facsimile: (312) 624-6309
sherry.knutson@tuckerellis.com
james.hemmings@tuckerellis.com

Attorneys for Defendants

*Takeda Pharmaceutical Company Limited,
Takeda Pharmaceuticals U.S.A., Inc.,
Takeda Pharmaceuticals America, Inc.,
Takeda Development Center Americas, Inc.,
Takeda California, Inc.,
Takeda Pharmaceuticals International, Inc.,
and Abbott Laboratories*

/s/ Loren H. Brown

Loren H. Brown
Cara D. Edwards
Lucas P. Przymusinski
DLA PIPER LLP (US)
1251 Avenue of the Americas, 27th Floor
New York, NY 10020
Tel: (212) 335-4500
Fax: (212) 335-4501
loren.brown@dlapiper.com
cara.edwards@dlapiper.com
lucas.przymusinski@dlapiper.com

/s/ Matthew A. Holian

Matthew A. Holian
Katie W. Insogna
DLA PIPER LLP (US)
33 Arch Street, 26th Floor
Boston, MA 02110
Tel: (617) 406-6000
Fax: (617) 406-6100
matt.holian@dlapiper.com
katie.insogna@dlapiper.com

/s/ Stephen C. Matthews

Stephen C. Matthews
DLA PIPER LLP (US)
51 John F. Kennedy Parkway, Suite 120
Short Hills, NJ 07078-2704
Tel: (973) 520-2550
Fax: (973) 520-2551
steve.matthews@dlapiper.com

*Attorneys for Defendants Pfizer Inc., Wyeth
LLC, Wyeth Pharmaceuticals Inc., and
Wyeth-Ayerst Laboratories*

/s/ K. C. Green

K. C. Green
Jeffrey F. Peck
Gina M. Saelinger
ULMER & BERNE LLP
600 Vine Street, Suite 2800
Cincinnati, Ohio 45202
Telephone: (513) 698-5000
Facsimile: (513) 698-5001
kcgreen@ulmer.com
jpeck@ulmer.com
gsaelinger@ulmer.com

*Attorneys for The Procter & Gamble Company
and The Procter & Gamble Manufacturing
Company*

/s/ Stephen J. McConnell

Stephen J. McConnell
Sandra M. Di Iorio
REED SMITH LLP
Three Logan Square
1717 Arch Street, Suite 3100
Philadelphia, PA 19103
Telephone: (215) 851-8100
smcconnell@reedsmith.com
sdiiorio@reedsmith.com

*Attorneys for GSK Consumer Health, Inc.
(f/k/a Novartis Consumer Health, Inc.)*

PPI MDL - Exhibit A to Stipulated Tolling Agreement

No.	Case Caption	Court/Jurisdiction	Cause No.	Plaintiff Counsel
1	<i>Sharon Taylor v. Abbott Laboratories, et al.</i>	CA-Superior Court-Los Angeles County	BC702049	Lopez McHugh, LLP; and NastLaw LLC
2	<i>Elaine Wheeler v. Abbott Laboratories, et al.</i>	CA-Superior Court-Orange County	30-2018-00986841	Lopez McHugh, LLP; and NastLaw LLC
3	<i>Gregory Griffin, et al. v. Abbott Laboratories, et al.</i>	CA-Superior Court-San Diego County	37-2018-00019439	Baron & Budd, P.C.
4	<i>Luzena Clay, As Special Administrator of the Estate of Luther Clay, Jr., Deceased v. Abbott Laboratories, et al.</i>	IL-Circuit Court of Cook County	2018-L-4265	Nolan Law Group; and NastLaw, LLC
6	<i>Linda M. Puetz, et al v. Abbott Laboratories, et al.</i>	IL-Circuit Court of Cook County	2018-MI-300873	Aylstock, Witkin, Kreis & Overholtz, PLLC
7	<i>Francis M. Rozich v. Abbott Laboratories, et al.</i>	IL-Circuit Court of Cook County	2018-L-003786	Nolan Law Group; and NastLaw, LLC
8	<i>Stanley B. Malone, et al. v. Abbott Laboratories, et al.</i>	IL-Circuit Court of the Twentieth Judicial Circuit St. Clair County	18L0263	Aylstock, Witkin, Kreis & Overholtz, PLLC
9	<i>Margaret Farrell v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154590	Napoli Shkolnik, PLLC
10	<i>Elizabeth Goheen v. Astrazeneca Pharmaceuticals LP, Astrazeneca LP, Pfizer, Inc.</i>	New York Supreme Court - New York County	18-155452	Napoli Shkolnik, PLLC
11	<i>Kellie Harvey and Joseph Harvey v. Astrazeneca Pharmaceuticals LP, Astrazeneca LP, Pfizer, Inc.</i>	New York Supreme Court - New York County	18-155451	Napoli Shkolnik, PLLC
12	<i>Mary Hart and Dan Hart v. Astrazeneca Pharmaceuticals LP, Astrazeneca LP, Pfizer, Inc.</i>	New York Supreme Court - New York County	18-155453	Napoli Shkolnik, PLLC

PPI MDL - Exhibit A to Stipulated Tolling Agreement

13	<i>Christaline Robinson As The Personal Representative of The Estate of Sarah Anderson, Deceased v. Astrazeneca Pharmaceuticals LP, Astrazeneca LP, Pfizer, Inc.</i>	New York Supreme Court - New York County	18-155454	Napoli Shkolnik, PLLC
14	<i>Jacqueline Jolly and Stephan Jolly v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154585	Napoli Shkolnik, PLLC
15	<i>Carol Simms v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154969	Napoli Shkolnik, PLLC
16	<i>Barry Lassiter v. Astrazeneca Pharmaceuticals LP, Astrazeneca LP, Pfizer, Inc.</i>	New York Supreme Court - New York County	18-155450	Napoli Shkolnik, PLLC
17	<i>Alicia Longoria v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155045	Napoli Shkolnik, PLLC
18	<i>Nancy Barnner v. AstraZeneca Pharmaceuticals LP, AstraZeneca LP, Pfizer, Inc. Takeda Pharmaceuticals USA, Inc., Takeda Pharmaceuticals America, Inc., Takeda Pharmaceuticals LLC, Takeda Pharmaceuticals International, Inc., Wyeth Pharmaceuticals, Inc.</i>	New York Supreme Court - New York County	18-155042	Napoli Shkolnik, PLLC
19	<i>Paul Marquardt v. AstraZeneca Pharmaceuticals LP, AstraZeneca LP, Pfizer, Inc., The Procter & Gamble Company, Procter & Gamble Manufacturing Company</i>	New York Supreme Court - New York County	18-154822	Napoli Shkolnik, PLLC

PPI MDL - Exhibit A to Stipulated Tolling Agreement

20	<i>Lolita Begay v. AstraZeneca Pharmaceuticals LP, AstraZeneca LP, Pfizer, Inc., The Procter & Gamble Company, Procter & Gamble Manufacturing Company, Wyeth Pharmaceuticals, Inc.</i>	New York Supreme Court - New York County	18-154884	Napoli Shkolnik, PLLC
21	<i>Jeannine Oellig v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154900	Napoli Shkolnik, PLLC
22	<i>Paulette Svec and Herbert Svec v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154912	Napoli Shkolnik, PLLC
23	<i>Marlene Charles v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154949	Napoli Shkolnik, PLLC
24	<i>Priscilla Accord and Richard Accord v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154950	Napoli Shkolnik, PLLC
25	<i>Donna Edwards and Billy Edwards v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154951	Napoli Shkolnik, PLLC
26	<i>Josephine Olson v. AstraZeneca Pharmaceuticals LP, AstraZeneca LP, et al.</i>	New York Supreme Court - New York County	18-154966	Napoli Shkolnik, PLLC
27	<i>Janice Jenkins and Glenn Jenkins v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154967	Napoli Shkolnik, PLLC
28	<i>Johnnie Collins v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154845	Napoli Shkolnik, PLLC
29	<i>Wesley Foster v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154709	Napoli Shkolnik, PLLC
30	<i>John Ruiz and Jennifer Ruiz v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-154786	Napoli Shkolnik, PLLC

PPI MDL - Exhibit A to Stipulated Tolling Agreement

31	<i>Peggy Mixter v. AstraZeneca Pharmaceuticals LP, AstraZeneca LP, et al.</i>	New York Supreme Court - New York County	18-154865	Napoli Shkolnik, PLLC
32	<i>Gonzalo Glover v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18- 115126	Napoli Shkolnik, PLLC
33	<i>Mary A. Roberson and Frederick Roberson v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155127	Napoli Shkolnik, PLLC
34	<i>Robert Hanse and Cynthia Hanse v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155178	Napoli Shkolnik, PLLC
35	<i>Susan Baldwin v. AstraZeneca Pharmaceuticals LP, , et al.</i>	New York Supreme Court - New York County	18-155180	Napoli Shkolnik, PLLC
36	<i>Jeanette Clark v. AstraZeneca Pharmaceuticals LP, , et al.</i>	New York Supreme Court - New York County	18-155181	Napoli Shkolnik, PLLC
37	<i>Vicki Hornsby and Paul Hornsby v. AstraZeneca Pharmaceuticals LP, , et al.</i>	New York Supreme Court - New York County	18-155182	Napoli Shkolnik, PLLC
38	<i>Elizabeth Jordan v. AstraZeneca Pharmaceuticals LP, , et al.</i>	New York Supreme Court - New York County	18- 155188	Napoli Shkolnik, PLLC
39	<i>James Brandenburg and Cynthia Brandenburg v. AstraZeneca</i>	New York Supreme Court - New York County	18-155189	Napoli Shkolnik, PLLC
40	<i>Rick and Diana Cook v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155190	Napoli Shkolnik, PLLC
41	<i>Gwendolyn Elliott v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155191	Napoli Shkolnik, PLLC
42	<i>Gleason v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155192	Napoli Shkolnik, PLLC
43	<i>Lawanda Horne v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155378	Napoli Shkolnik, PLLC
44	<i>Evelyn Handy v. AstraZeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155376	Napoli Shkolnik, PLLC

PPI MDL - Exhibit A to Stipulated Tolling Agreement

45	<i>Robert Sifuentes v. Pfizer, Inc., et al.</i>	New York Supreme Court - New York County	18-155415	Napoli Shkolnik, PLLC
46	<i>Wayne Laul and Barbara Laul v. Astrazeneca Pharmaceuticals LP, et al.</i>	New York Supreme Court - New York County	18-155345	Napoli Shkolnik, PLLC
47	<i>Mark Irwin v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Atlantic Co. State Court	ATL-L-000824-18	Baron & Budd, P.C.
48	<i>Geraldine A. Allessandrini v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002820-18	Aylstock, Witkin, Kreis & Overholtz, PLLC
49	<i>Susie Anderson v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002845-18	Baron & Budd, P.C.
50	<i>Brian Baker v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002719-18	Weitz & Luxenberg, P.C.
51	<i>Wendy Blair v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002822-18	Aylstock, Witkin, Kreis & Overholtz, PLLC
52	<i>Arthur H. Blankfield v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-002828-18	Aylstock, Witkin, Kreis & Overholtz, PLLC
53	<i>Linda Mae Brown v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002805-18	Baron & Budd, P.C.
54	<i>Ramon Camacho v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002832-18	Aylstock, Witkin, Kreis & Overholtz, PLLC
55	<i>John Clancy v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002847-18	Baron & Budd, P.C.
56	<i>Ronald Clark v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002862-18	Baron & Budd, P.C.
57	<i>Betty Craig v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002768-18	Baron & Budd, P.C.
58	<i>Gregory DeFilippo v. AstraZeneca LP, et al.</i>	NJ-Bergen Co. State Court	BER-002739-18	Weitz & Luxenberg, P.C.
59	<i>Donnie Dickey v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002793-18	Baron & Budd, P.C.
60	<i>Marybeth Dimarco v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002714-18	Weitz & Luxenberg, P.C.

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61	<i>George DiPoalo v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-02813-18	Weitz & Luxenberg, P.C.
62	<i>Myra Fagin v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002810-18	Baron & Budd, P.C.
63	<i>Miguel Gutierrez v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002701-18	Aylstock, Witkin, Kreis & Overholtz, PLLC
64	<i>Oscar Hardy v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002765-18	Baron & Budd, P.C.
65	<i>Lori Hartz v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002865-18	Baron & Budd, P.C.
66	<i>Edward Hill v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002715-18	Weitz & Luxenberg, P.C.
67	<i>William Householder v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002884-18	Baron & Budd, P.C.
68	<i>Ali Jabr v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002815-18	Baron & Budd, P.C.
69	<i>Thelma Jackson v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002726-18	Weitz & Luxenberg, P.C.
70	<i>Fitzgerald Johnson v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002816-18	Baron & Budd, P.C.
71	<i>Jeffrey Lewis v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002826-18	Weitz & Luxenberg, P.C.
72	<i>Lorraine Lewis v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002717-18	Weitz & Luxenberg, P.C.
73	<i>Diane Mallon v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002883-18	Baron & Budd, P.C.
74	<i>Wanda Merritt v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002881-18	Baron & Budd, P.C.
75	<i>Gail Oberther v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002877-18	Baron & Budd, P.C.
76	<i>Billie Prewitt v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002879-18	Baron & Budd, P.C.
77	<i>Joyce M. Rappa v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002702-18	Aylstock, Witkin, Kreis & Overholtz, PLLC

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78	<i>Gloria Reinhart v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002817-18	Baron & Budd, P.C.
79	<i>Verna Robinson v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002838-18	Baron & Budd, P.C.
80	<i>Daniel Rubin v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002878-18	Baron & Budd, P.C.
81	<i>Mildred Ryan v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002785-18	Baron & Budd, P.C.
82	<i>Rita Sinon v. AstraZeneca Pharmaceuticals LP, et al.</i>	NJ-Bergen Co. State Court	BER-L-002848-18	Baron & Budd, P.C.
83	<i>Kwaesha Tarver v. Abbott Laboratories, et al.</i>	NJ-Bergen Co. State Court	BER-L-002736-18	Weitz & Luxenberg, P.C.
84	<i>William N. Henry, Individually and as the Representative of the Estate of Kevin M. Henry v. Abbott Laboratories, et al.</i>	NJ-Camden Co. State Court	CAM-L-001415-18	Lopez McHugh, LLP
85	<i>Betty Bowman, Individually and as the Representative of the Estate of Peggy Lee Smalley v. Abbott Laboratories, et al.</i>	OH-Court of Common Pleas Clinton County	CVB18000143	Borgess Law, LLC and NastLaw
86	<i>Samuel Davis v. Abbott Laboratories, et al.</i>	OH-Court of Common Pleas Franklin County	18CV003104	NastLaw, LLC
87	<i>Sharon L. Bargo v. Abbott Laboratories, et al.</i>	PA-Court of Common Pleas of Philadelphia	180402003	Aylstock, Witkin, Kreis & Overholtz, PLLC
88	<i>Arthur Daly v. Abbott Laboratories, et al.</i>	PA-Court of Common Pleas of Philadelphia	180402005	Aylstock, Witkin, Kreis & Overholtz, PLLC
89	<i>Wendy Pierson v. Abbott Laboratories, et al.</i>	PA-Court of Common Pleas of Philadelphia	180402004	Aylstock, Witkin, Kreis & Overholtz, PLLC

PPI MDL - Exhibit B to Stipulated Tolling Agreement

No.	Case Caption	Court/Jurisdiction	Cause No.	Plaintiff Counsel
1	<i>Robert Acosta, et al. v. Abbott Laboratories, et al.</i>	S.D. Tex Transferred to MDL 2789 via CTO-16	4:18-cv-01204 2:18-cv-09507	Bailey Peavy Bailey Cowan Heckaman PLLC
2	<i>Nina Adams, et al. v. Abbott Laboratories, et al.</i>	W.D. Okla. Transferred to MDL 2789 via CTO-16	5:18-cv-00352 2:18-cv-09783	Bailey Peavy Bailey Cowan Heckaman PLLC
3	<i>Kenneth Allen, et al. v. Abbott Laboratories, et al.</i>	E.D. Cal.	1:18-at-00279	Weitz & Luxenberg. P.C.
4	<i>Charlotte A. Bayless, et al. v. Abbott Laboratories, et al.</i>	S.D. Cal.	3:18-cv-00745	Weitz & Luxenberg. P.C.
5	<i>Mary Day, et al. v. Abbott Laboratories, et al.</i>	D. Kan. Transferred to MDL 2789 via CTO-15	2:18-cv-02181 2:18-cv-08550	Goza & Honnold, LLC; and Weitz & Luxenberg, P.C.
6	<i>Raul Fernandez, et al. v. Abbott Laboratories, et al.</i>	S.D. Cal.	3:18-cv-00747	Weitz & Luxenberg. P.C.
7	<i>Eugene Fisher, et al. v. Abbott Laboratories, et al.</i>	C.D. Cal. Transferred to MDL 2789 via CTO-15	2:18-cv-03073 2:18-cv-08615	Weitz & Luxenberg. P.C.
8	<i>Jeffrey S. Freeman, et al. v. Abbott Laboratories, et al.</i>	D. Col.	1:18-cv-00885	Aylstock, Witkin, Kreis & Overholtz, PLLC
9	<i>Carmen Levier, et al. v. Abbott Laboratories, et al.</i>	D. Kan.	2:18-cv-02180	Goza & Honnold, LLC; and Aylstock, Witkin, Kreis & Overholtz, PLLC