

**BEFORE THE UNITED STATES
JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

**IN RE: LINEAR GADOLINIUM-BASED
CONTRAST AGENTS PRODUCTS
LIABILITY LITIGATION**

MDL No. 2868

**DEFENDANTS BAYER HEALTHCARE PHARMACEUTICALS INC., BAYER CORP.,
AND BAYER HEALTHCARE LLC'S SUPPLEMENTAL RESPONSE TO PLAINTIFFS'
MOTION FOR TRANSFER OF ACTIONS PURSUANT TO 28 U.S.C. § 1407**

In anticipation of the Panel’s upcoming hearing, Bayer hereby supplements its opposition to Plaintiffs’ Motion for Transfer (the “MDL Motion”) to inform the Panel of recent developments. When Cutter Law filed this MDL Motion, it was counsel for every served action at issue. Now, Cutter Law, its various local counsel, and one other firm have since tagged additional actions, creating a façade of diversity among counsel.¹ Three of these firms, none of whom have had any lead involvement in this years-old litigation, filed “interested party” statements to join the MDL Motion in the past few weeks. Plaintiffs suggest that these new developments support creation of an MDL and transfer to a particular venue. In fact, these efforts are nothing more than veiled gamesmanship.² None undermine the conclusion that:

- Plaintiffs’ alleged injuries remain diverse, highlighting the absence of a core commonality among the cases. Indeed, Plaintiffs concede that each litigant’s constellation of alleged injuries varies. *See* Movants’ Reply p.6;
- Informal coordination remains feasible, with a single plaintiff firm (Cutter Law) still controlling nearly all filed actions. Plaintiffs refuse to acknowledge successful coordination and progress in currently-pending cases, including Bayer’s production of hundreds of thousands of pages of documents, and the parties’ efforts to schedule 30(b)(6) depositions next month, in the three cases in the District of Arizona. *See* 8/30/18 *Pierik* Resp. (Dkt. No. 50) p.10 (claiming that “nothing of substance has happened (or will happen) in the District of Arizona anytime soon”); and
- Notwithstanding Plaintiffs’ counsel’s speculation about thousands of unidentified potential litigants, the actual number of cases presently before the Panel (naming four different gadolinium-based contrast agents (“GBCAs”) with different

¹ *See, e.g.*, 07/31/18 Compl., Dkt. No. 1, *Viruet v. Bayer HealthCare Pharmaceuticals Inc., et al.*, No. 18-cv-11611 (D. Mass.). This uptick in activity is unsurprising given Cutter Law’s advertising efforts to recruit other firms shortly before its MDL Motion was filed. Ex.18, Cutter Law Ad.

² Indeed, one newly-tagged (and as-yet-unserved) action, filed by a debuting law firm mere weeks before the Panel’s hearing, references Cutter Law’s MDL Motion in the *first* paragraph of the Complaint. *See* 09/07/18 Compl. p.1 ¶ 1, Dkt. No. 1, *Dennis v. Bayer Healthcare Pharmaceuticals Inc., et al.*, No. 3:18-cv-491 (W.D.N.C.) (“This is one of many similar cases pending in United States District Courts throughout the country, and for which an MDL motion for transfer and centralization was filed with the Judicial Panel on Multidistrict Litigation on July 31, 2018.”).

retention rates³ manufactured by four different defendants) remains readily manageable without the need for MDL centralization.

In sum, these recent developments confirm that Plaintiffs' request to create a catch-all MDL encompassing all claimed "adverse events in patients with normal kidney function" after clinical administration of GBCAs should be denied, at the very least, as premature. 8/30/18 *Pierik* Resp. (Dkt. No. 50) p.7. Moreover, even if the Panel is inclined to grant the motion over Defendants' unanimous objections, Plaintiffs' recent forum manipulation, for instance, filing actions by out-of-state plaintiffs to bolster the number of D. Mass. cases, should not be credited by the Panel as a reason to site any MDL there.

I. ARGUMENT

A. Individualized Questions of Fact Overwhelm Any Common Issues

In their recent filings, Plaintiffs effectively concede that their proposed catch-all MDL knows no bounds: they endeavor to capture all claimed "adverse events in patients with normal kidney function" involving four different GBCAs manufactured by four different defendants – each with different product retention rates.⁴ 8/30/18 *Pierik* Resp. (Dkt. No. 50) p.7. And Plaintiffs do not deny the vagueness, and sweeping range, of each claimant's alleged injuries. Indeed, they *admit* that the constellation of alleged injuries varies from case to case. *See* Bayer Opp. Ex. 1; Movants' Reply p.6 (conceding that Plaintiffs exhibit a "constellation of

³ Plaintiffs' responses ignore the FDA's recognition of different retention rates among the GBCA products, and its statements that "[g]adolinium retention has not been directly linked to adverse health effects in patients with normal kidney function." 12/19/17 FDA Safety Announcement, <https://www.fda.gov/Drugs/DrugSafety/ucm589213.htm>.

⁴ Notably, Plaintiffs have not addressed their inclusion of macrocyclic (non-linear) GBCA cases in an MDL Motion supposedly limited to linear GBCAs. Bayer Opp. p.11. Nor do they explain how a plaintiff with "end stage renal disease" ended up in an MDL request supposedly involving "people with normal or near-normal kidney function." *Id.* at 10. These anomalies, among other distinguishing features across the cases, highlight the lack of any potential benefit from consolidation.

symptoms”).⁵ The resultant individualized medical causation issues, fact discovery, and expert discovery would consume any superficial commonalities. *See In re Proton-Pump Inhibitor Prod. Liab. Litig.*, 273 F. Supp. 3d 1360, 1362 (J.P.M.L. 2017) (denying centralization of 15 actions and 24 tagalongs and finding that “the variety of kidney injuries alleged, combined with these differences among the drugs, significantly undermines any efficiency gains to be achieved from centralization”).

Plaintiffs’ recent filings underscore that individualized issues would eliminate any efficiencies typically realized by consolidation.⁶ For example, Plaintiffs do not dispute that findings regarding the *Combs* Plaintiff’s alleged symptoms – including high cholesterol, fatigue, a thickened uterus, and stomach polyps – would have no bearing on the *Sabol* Plaintiff’s allegations of dry eyes and mouth, vertigo, and muscle contractions. This lack of commonality can be observed across all of the cases. *See* Bayer Opp. pp.9-10; Bayer Opp. Ex. 1. Thus, Plaintiffs’ concerns about duplication and inconsistency are unfounded: fact and expert discovery will be driven by each plaintiff’s unique configuration of alleged injuries.⁷ No meaningful discovery tracks could be created given each plaintiff’s distinct combination of

⁵ Plaintiffs’ own citations do not support their contention that a rejection of their request to transfer would mean “there would be nearly no mass tort centralizations.” Movants’ Reply p.6. For example, *In re Phenylpropanolamine Products Liab. Litig.*, Movants’ Reply p.7, involved a narrow, unified injury recognized by the greater medical community: hemorrhagic stroke. *See* 04/06/01 Motion for Transfer pp.1-3, Dkt. No. 1, *In re PPA Prods. Liab. Litig.*, MDL No. 1407. And the *Agent Orange* conditional transfer order sending a case into a nearly 20-year old MDL had nothing to do with whether consolidation was warranted in the first place. Finally, *In re: Gadolinium Contrast Dyes* bears no relation to the instant action for all of the reasons detailed in Bayer’s brief, not least of which, it dealt with one, unified injury – NSF. *See* Bayer Opp. p.16.

⁶ Plaintiffs try to gloss over these differences by claiming “some plaintiffs are sicker than others” Movants’ Reply p.6. But Plaintiffs do not allege a common “sickness” with different levels of severity. They each allege a different patchwork of injuries untethered to a common medically-recognized disease.

⁷ The individualized nature of these cases is only amplified here where many of the claimed injuries have been included in the FDA-approved warning label *for decades*. Bayer Opp. p.10.

alleged injuries from different products made by different defendant manufacturers.⁸ Plaintiffs' proposed MDL remains unworkable, and consolidation would only slow the resolution of these highly individualized cases.

B. Any Superficial Commonalities Can Be Addressed by Informal Coordination

Plaintiffs' latest speculation about hypothetical conflicts that have yet to occur does not warrant consolidation. 09/10/18 *Brown* Resp. (Dkt. No. 70) p.6. Notably absent is any suggestion that the parties have failed to coordinate thus far: Cutter Law does not identify a single instance where the parties were unable to coordinate effectively. And the interested party respondents have not come close to exhausting all other alternatives before embracing Cutter Law's MDL Motion. These counsel either had not served Bayer until well after the MDL Motion was filed or still have not served Bayer to date. See *In re Express Courier Int'l, Inc., Fair Labor Standards Act (FLSA) & Wage & Hour Litig.*, No. MDL 2854, 2018 WL 3725839, at *1 (J.P.M.L. Aug. 1, 2018) ("While, as plaintiffs argue, thirteen courts are not obligated to adopt a discovery schedule agreed to by the parties, the parties should *attempt* such informal means of coordination before resorting to Section 1407 centralization." (emphasis added)); *In re Best Buy Co., Inc., California Song-Beverly Credit Card Act Litig.*, 804 F. Supp. 2d 1376, 1378 (J.P.M.L. 2011) ("[C]entralization under Section 1407 should be the last solution after considered review of all other options."). Plaintiffs' transfer request is, at minimum, premature.

Plaintiffs have also failed to identify any overlapping discovery incapable of being addressed by informal coordination between the parties. Plaintiffs instead drum up illusory commonalities like the FDA's 2018 class-wide product label change and the related "Dear

⁸ While Plaintiffs continue to maintain that "a significant percentage of cases in this litigation will involve multiple manufacturers," 09/10/18 *Brown* Resp. (Dkt. No. 70) p.6, only four served Bayer cases in this MDL Motion name any other manufacturers.

Healthcare Provider” letter. *See, e.g.*, 08/30/18 *Pierik* Resp. (Dkt. No. 50) p.3. But discovery on these undisputed developments will not be particularly complex, and certainly does not overcome over the individualized nature of Plaintiffs’ disparate cases. *See, e.g., In re Abbott Labs., Inc., Similac Prods. Liab. Litig.*, 763 F. Supp. 2d 1376 (J.P.M.L. 2011) (denying centralization where “Plaintiffs’ claims share[d] facts concerning Abbott’s recall of certain Similac products because of the presence of beetles and/or beetle larvae, which according to the FDA posed no immediate health risk” since “these facts are relatively undisputed”).

C. Given the Few Involved Counsel, Informal Coordination Is Preferable

Nor do the new, strategically-timed-and-placed tagged lawsuits preclude informal coordination. Despite Plaintiffs’ counsel’s repeated efforts to portray diversity among counsel, nearly all of the proposed MDL actions are brought by one firm: Cutter Law.

Cutter Law’s Cases			Cutter Law’s Directly Affiliated Counsel’s Cases ⁹	New Counsel’s Cases
<i>Davis</i>	<i>Gerrity</i>	<i>Walton</i>	<i>Viruet/Pierik</i> (same firm)	<i>Peterson/Brown</i>
<i>Munnuru</i>	<i>Goodell</i>	<i>Hollifield</i>	<i>Lewis/Welty</i> (same firm)	(same firm)
<i>Fischer</i>	<i>McGrath</i>	<i>Doe</i>		<i>Dennis</i>
<i>Geisse</i>	<i>Zelazny</i>	<i>Klein</i>		<i>Carney</i>
<i>Young</i>	<i>Combs</i>	<i>Miller</i>		
<i>Winkler</i>	<i>Norris</i>	<i>Esserman</i>		
<i>Sabol</i>	<i>Javens</i>	<i>Montani</i>		

No one disputes that every manufacturer is represented by the same counsel. Nor does any party disagree that Cutter Law has led *every* active case so far.¹⁰ If anything, these actions initiated after Cutter Law’s MDL Motion, after Defendants’ oppositions were filed, and mere weeks before the JPML hearing, bespeak a desire to manufacture an MDL to serve counsel’s

⁹ *White* (not listed) is a pro se NSF case. *See* Bayer Opp. p.10. Cutter Law’s “directly affiliated” counsel serve as its co-counsel in other actions included in the MDL motion. *See* Bayer Opp. p.12 n.11.

¹⁰ The only firm to disavow affiliation with Cutter Law, Davis & Crump, does not disclaim working in concert with Cutter Law. *See, e.g.*, 09/10/18 *Brown* Resp. (Dkt. No. 70) p.5.

own goals rather than § 1407's stated goals of convenience for the parties and witnesses, justice, and efficiency. *See In re CVS Caremark Corp. Wage & Hour Emp't Practices Litig.*, 684 F. Supp. 2d 1377, 1379 (J.P.M.L. 2010) (“where a Section 1407 motion appears intended to further the interests of particular counsel more than those of the statute, we would certainly find less favor with it”).

Informal coordination remains preferable. Defendants stand ready and willing to coordinate informally with any new counsel joining the litigation after the MDL Motion was filed – as they have done with Cutter Law for nearly two years. Bayer Opp. p.15. No party has given a reason why cooperative efforts between the parties cannot and should not continue.

D. Plaintiffs' Forecasts of Future Filings Merit No Consideration

Plaintiffs' counsel's post-Motion predictions of thousands of future plaintiffs are a red herring. As an initial matter, any filing of more cases does nothing to cure the inherently individualized nature of these suits and their resulting unsuitability for MDL resolution. *See supra* pp.2-4; Bayer Opp. pp.9-11. Furthermore, counsel's unsubstantiated claim that additional law firms are waiting in the wings and “investigating” cases raises the question why no one has prosecuted these claims for the last two years.¹¹ It remains to be seen whether any of these cases will ever actually be filed outside of an MDL, and, if so, what new constellations of injuries these plaintiffs will allege. Presently, thirty actions have been identified for the Panel's

¹¹ Plaintiffs try to gloss over this glaring discrepancy by characterizing the 2018 label change as a turning point, *see, e.g.*, 09/10/18 *Brown* Resp. (Dkt. No. 70) p.5, but they ignore that the 2018 FDA-approved label revision states “clinical consequences of gadolinium retention **have not been established** in patients with normal renal function.” *See* 7/25/18 Revised Magnevist label at 4, https://www.accessdata.fda.gov/drugsatfda_docs/label/2018/019596s064s065lbl.pdf (emphasis added). What's more, the FDA publicly stated that while “trace amounts of gadolinium may stay in the body long-term,” the “[a]vailable information **does not identify any adverse health effects**” in July 2015 – over three years ago. *See* 7/27/15 FDA Safety Announcement, <https://www.fda.gov/Drugs/DrugSafety/ucm455386.htm> (emphasis added).

consideration,¹² and, in any event, the Panel has consistently rejected hypothetical future filings as a basis for consolidation. *See* Bayer Opp. p.13.

E. If an MDL Is Formed Over All Defendants’ Objections, Plaintiffs’ Venue Manipulation Should Not Be Credited.

If centralization is ordered over Defendants’ unanimous objections, the Panel’s ultimate venue selection should not be steered by Plaintiffs’ counsel’s gamesmanship.

N.D. Cal.: Bayer previously detailed Cutter Law’s ongoing efforts to warehouse this litigation in that firm’s home district of N.D. Cal. Bayer Opp. pp.4-6, 15. Cutter Law or affiliated counsel have tagged two actions in N.D. Cal. after Defendants’ oppositions were filed, even though Cutter Law has moved to remand several of its cases for lack of federal jurisdiction. Further, Cutter Law has yet to explain how centralization in N.D. Cal. would be convenient for the firm’s own clients, Defendants, the witnesses, or anyone else beyond Cutter Law.

D. Mass.: The gamesmanship being employed in D. Mass. mirrors the improper strategy that posed serious jurisdictional issues in N.D. Cal.¹³ Plaintiffs have tagged two additional actions in D. Mass (*Hollifield* (still unserved) and *Pierik*) – both filed by Cutter Law or its Boston local counsel on behalf of out-of-state plaintiffs (from NC and IL respectively) against out-of-state Defendants in counsel’s preferred venue.

S.D. Ill.: The *Welty* and *Brown* interested party respondents’ request for transfer to Judge Staci M. Yandle in S.D. Ill. should be rejected. Plaintiffs depict this option as “centrally located

¹² The previous MDLs Plaintiffs cite as justification are all readily distinguishable from the one presently proposed. Movants’ Reply pp.6-7. For instance, they involved defendants overwhelmingly supporting transfer, many times more tag-along cases than found here, a unified injury at issue, one manufacturer making one product, or other distinguishing factors.

¹³ Notably, *Goodell* was the only served case pending in D. Mass. until the day the MDL Motion was filed. Pursuant to the parties’ agreed briefing schedule, Bayer has since moved to dismiss *Goodell*. *See* 09/10/18 Motion to Dismiss and Memo. in Support, Dkt. Nos. 54, 55, *Goodell v. Bayer HealthCare Pharmaceuticals Inc., et al.*, No. 1:18-cv-10694 (D. Mass.).

and easily accessible,” and even represent that the courthouse is “located only 15.6 miles” from the St. Louis airport. 08/23/18 *Welty* Resp. (Dkt. 41) pp.3-4. But they neglect to mention that Judge Yandle’s chambers are not located in East St. Louis, but in Benton, Illinois (nearly 100 miles away). Transfer to this district would be highly inconvenient.

D. Del. and S.D.N.Y.: Plaintiffs have not acknowledged, much less objected to, Bayer’s alternative S.D.N.Y. proposal. Like the District of Delaware, S.D.N.Y. would be far more convenient than Plaintiffs’ selections.¹⁴ Plaintiffs’ “slippery slope” argument against consolidation in D. Del. is unfounded, *see* Movants’ Reply p.9 (“virtually every MDL could be sent to Delaware . . .”), particularly since there are *no* MDLs currently pending in D. Del. More importantly, Plaintiffs do not defend their staunch rejection of Bayer’s open offer to transfer a significant number of these actions to D. Del. to cure jurisdictional defects. Bayer Opp. p.5.

II. CONCLUSION

For these reasons and for those stated in Bayer’s opposition brief, the Panel should deny Plaintiffs’ MDL Motion. Should the Panel form an MDL over Defendants’ objections, Bayer requests transfer of these actions to the Hon. Richard G. Andrews in the District of Delaware or, alternatively, the Hon. John G. Koeltl in the Southern District of New York.

¹⁴ Two of the interested party respondents even request that the entire litigation be transferred to judges with no pending relevant cases. It is unlikely that efficiencies would be gained over Bayer’s S.D.N.Y. or D. Del. proposals by uprooting these cases and transferring them to a judge with no prior involvement in the litigation.

Dated: September 20, 2018

Respectfully submitted,

/s/ Jennifer L. Greenblatt

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**BEFORE THE UNITED STATES
JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

**IN RE: LINEAR GADOLINIUM-BASED
CONTRAST AGENTS PRODUCTS
LIABILITY ACTION**

MDL Docket No. 2868

**DECLARATION OF JENNIFER L. GREENBLATT IN SUPPORT OF
BAYER HEALTHCARE PHARMACEUTICALS INC., BAYER CORP., AND
BAYER HEALTHCARE LLC'S SUPPLEMENTAL RESPONSE TO PLAINTIFFS'
MOTION FOR TRANSFER OF ACTIONS PURSUANT TO 28 U.S.C. § 1407**

I, Jennifer L. Greenblatt, hereby declare:

1. I am an attorney at Goldman Ismail Tomaselli Brennan & Baum LLP. I represent Bayer HealthCare Pharmaceuticals Inc., Bayer Corp., and Bayer HealthCare LLC (“Bayer”) in this matter. I submit this declaration in support of Bayer HealthCare Pharmaceuticals Inc., Bayer Corp., and Bayer HealthCare LLC’s Supplemental Response to Plaintiffs’ Motion for Transfer of Actions Pursuant To 28 U.S.C. § 1407.

2. I am over 18 years of age and competent to make this declaration. If called to testify as a witness in this matter, I could and would testify truthfully to each of the statements in this declaration.

3. Attached hereto as **Exhibit 18** is a true and correct copy of an online advertisement for a May 9, 2018 webinar presented by Brooks Cutter of Cutter Law P.C., which I have converted to a PDF.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 20, 2018, in Chicago, Illinois.



Jennifer L. Greenblatt

EXHIBIT 18

**Six Days Left to Register for This Must See
Webinar Hosted by CAMG
Wednesday, May 9th at 10 am PDT**

**New FDA Warning on Gadolinium
Based Contrast Agent!**

This is NOT the Gadolinium NSF litigation

*The effects of retained MRI contrast agents in people with
normal kidneys leads to new FDA warnings and litigation.*

Presented by Brooks Cutter of Cutter Law

**MRI Contrast Agent Linked
to Debilitating Injuries
Despite Safe Alternative**



Brand New Litigation!

When: May 9th, 2018 - 10 am PDT

How: Pre-register at webinar.camginc.com

Cost: FREE

What you can expect to learn from this webinar:

1. Summary of the relevant science and liability
2. Case criteria
3. Litigation update
4. Distinguishing criteria of Gadolinium Deposition Disease
5. How this case differs from the prior NSF litigation

Presented By



Brooks Cutter



Brooks is a founding partner of Cutter Law PC, with offices in Oakland and Sacramento. Brooks represents a variety of clients -- people with significant personal injuries, corporate whistleblowers, and victims of fraud and insurance bad faith among them. He is recognized nationally for his experience and skillful prosecution of complex consumer class action litigation and multidistrict mass tort cases, including lead or co lead roles in MDL and California coordinated proceedings. He is on the faculty at Trial Lawyers College, and he is a member of ABOTA.

Hosted By



Steve Nober
Consumer Attorney Marketing Group

Steve Nober will speak on the following areas:

- Intake & Injury analysis from qualified victims
- Geographic & Demographic data
- Successful marketing strategies
- Performance cost details



When: May 9th, 2018 - 10 am PDT

How: Pre-register at webinar.camginc.com

Cost: FREE

Gadolinium

Gadolinium-based contrast agents have been used for diagnosis and treatment guidance in more than 100 million patients worldwide over the past 25 years. These agents enhance the quality of images in MRI exams by altering the magnetic properties of nearby water molecules in the body. In September of 2017 the US Food and Drug Administration (FDA) announced it will require additional warnings for gadolinium-based contrast agents (GBCAs) after new research has found accumulation of residual gadolinium in the brains of patients who had undergone multiple contrast-enhanced MRI exams resulting in serious injuries. The most common type of injury includes a rare disease called Nephrogenic Systemic Fibrosis (NSF), also known as Nephrogenic Fibrosing Dermopathy (NFD) along with Gadolinium storage condition and Gadolinium deposition disease. Symptoms include brain fog, skin burning sensation, bone and joint pain, and discoloration, thickening and pain of the skin. This litigation focuses on a particular type of contrast agent marketed by Bayer, GE, and others without warning despite a known safer alternative.

Pre-registration is required. Please register now by going to the following link:

<http://webinar.camginc.com>

Log in approximately 5 minutes before the webinar is supposed to begin, and you will automatically join the call.

When: May 9th, 2018 - 10 am PDT

How: Pre-register at webinar.camginc.com

Cost: FREE



CAMG's marketing division works exclusively with law firms delivering the full spectrum of media buying services for Television, Radio, Print, & Outdoor/Out-of-Home. Our transparent approach provides your firm with media schedules, pricing, and performance metrics each week. With our media buying expertise, industry experience, and intensive analytics we are able to deliver the most effective marketing campaigns.

CAMG's six service divisions allow you to vertically integrate all of your marketing and new case acquisition needs with just one partner. Our divisions include: Response Driven Marketing, Contract Processing, Call Center Services, Medical Record Services, Phone Number Management & Data Publishing.

SCHEDULE OF ACTIONS

The foregoing document(s) relate(s) to the following actions¹:

Case Caption	Plaintiff	District	Civil Action No.	Judge
<i>Geisse et al. v. Bayer HealthCare Pharmaceuticals Inc., et al.</i>	Kathleen Geisse, Ph.D., Curtis Ulleseit and Lisa Wehlmann	N.D. Cal.	3:17-cv-07026	James Donato
<i>Young v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Patricia Young	N.D. Cal.	3:18-cv-00811	James Donato
<i>Winkler v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Beth Winkler	N.D. Cal.	3:18-cv-03077	James Donato
<i>Goodell v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Stephen Goodell	D. Mass.	1:18-cv-10694	Indira Talwani
<i>McGrath v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Denise McGrath	E.D.N.Y.	1:18-cv-02134	Raymond J. Dearie
<i>Fischer v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Susan Fischer	D. Ariz.	2:18-cv-01778	David G. Campbell
<i>Sabol v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Marcia Sabol	M.D. Fla.	8:18-cv-00850	Charlene Edwards Honeywell
<i>Zelazny v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Marcin Zelazny	S.D.N.Y.	1:18-cv-03246	John G. Koeltl
<i>Combs v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Lori Combs	N.D. Ohio	1:18-cv-00802	Donald C. Nugent

¹ *Hollifield v. GE Healthcare Inc., et al.* was identified in an August 15, 2018 Notice of Potential Tag-Along Actions. *Peterson v. Bayer HealthCare Pharmaceuticals Inc., et al.* was identified in a September 6, 2018 Notice of Potential Tag-Along Actions. *Dennis v. Bayer HealthCare Pharmaceuticals Inc., et al.* was identified in a September 18, 2018 Notice of Potential Tag-Along Actions. Bayer has not been served in these cases, but includes these matters in this Schedule of Actions in an abundance of caution. The Bayer Defendants herein do not waive service or other rights in these matters.

Case Caption	Plaintiff	District	Civil Action No.	Judge
<i>Lewis v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Joseph Lewis	N.D. Cal.	3:18-cv-04146	James Donato
<i>Viruet v. Bayer HealthCare Pharmaceuticals Inc. et al.</i>	Kimberly Ann Viruet	D. Mass.	1:18-cv-11611	Indira Talwani
<i>Hollifield v. GE Healthcare Inc., et al.</i>	Thelma Kaye Hollifield	D. Mass.	1:18-cv-11626	Indira Talwani
<i>Doe v. Bayer HealthCare Pharmaceuticals Inc., et al.</i>	“Jane Doe”	N.D. Cal.	3:18-cv-04568	James Donato
<i>Klein v. Bayer HealthCare Pharmaceuticals Inc., et al.</i>	Ingeborg Klein; Karin Klein	D. Nev.	2:18-cv-01424	Andrew P. Gordon
<i>Peterson v. Bayer HealthCare Pharmaceuticals Inc., et al.</i>	Amelia Peterson	D. Ariz.	2:18-cv-02739	G. Murray Snow
<i>Dennis v. Bayer HealthCare Pharmaceuticals Inc., et al.</i>	Emily Dennis	W.D.N.C.	3:18-cv-00491	Frank D. Whitney

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LIABILITY LITIGATION**

MDL No. 2868

PROOF OF SERVICE

In compliance with Rule 4.1(a) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, I hereby certify that on September 20, 2018 **DEFENDANTS BAYER HEALTHCARE PHARMACEUTICALS INC., BAYER CORP., AND BAYER HEALTHCARE LLC'S SUPPLEMENTAL RESPONSE TO PLAINTIFFS' MOTION FOR TRANSFER OF ACTIONS PURSUANT TO 28 U.S.C. § 1407** was electronically filed with the Clerk of the JPML via CM/ECF. Copies of the above-referenced documents were sent by e-mail, to the following service list, to anyone unable to accept them via the electronic filing system.

No.	Case Captions	Plaintiff Counsel	Defense Counsel
1.	Hilary Davis v. McKesson Corporation; McKesson Medical-Surgical Inc.; Guerbet, LLC; Mallinckrodt, Inc.; Mallinckrodt LLC; Enterprise Holdings, Inc. Which Will Do Business In California As Mallinckrodt Pharmaceuticals; Mallinckrodt Manufacturing LLC; Liebel-Flarsheim Company LLC; Curascript, Inc.; Amerisourcebergen Corporation; Amerisourcebergen Drug Corporation; and Does 1 through 20	<p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com</p> <p>Curt William Clausen Clausen & Williamson PLLC 2999 N 44th St., Ste. 318 Phoenix, AZ 85018-7520 602-285-4450 Fax:602-285-4483 Email: curt@cwazlaw.com</p>	<p>Habib Nasrullah Wheeler Trigg O'Donnell, LLP 370 17th St., Ste. 4300 Denver, CO 80202 303-244-1879 Email: nasrullah@wtotrial.com <i>Representing McKesson Corporation & McKesson Medical-Surgical Incorporated.</i></p> <p>Christina Marie Vitale Morgan Lewis & Bockius LLP – Houston, TX 1000 Louisiana St., Ste. 4000 Houston, TX 77002 713-890-5001 Fax: 713-890-5001 Email: christina.vitale@morganlewis.com <i>Representing Guerbet LLC & Liebel-Flarsheim Company LLC</i></p> <p>Jamie Kendall Brad Michael Welsh Kendall Law Firm PC 1201 County Line Rd., Ste. G Bryn Mawr, PA 19010</p>

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2.	<p>Srihari Munnuru v. Guerbet, LLC; Mallinckrodt Inc.; Mallinckrodt LLC; Liebel-Flarsheim Company LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50 D. Arizona 2:18-01159</p>	<p>Curt William Clausen Clausen & Williamson PLLC 2999 N 44th St., Ste. 318 Phoenix, AZ 85018-7520 602-285-4450 Fax: 602-285-4483 Email: curt@cwazlaw.com</p> <p>Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 twalburg@cutterlaw.com</p>	<p>Jamie Kendall Brad Michel Welsh Kendall Law Firm PC 1201 County Line Rd., Ste. G Bryn Mawr, PA 19010 610-756-0200 Fax: 610-756-0202 Email: bwelsh@tkfirm.com Email: jkendall@tkfirm.com <i>Representing Guerbet, LLC, Liebel-Flarsheim Company LLC</i></p> <p>Brian W Shaffer Morgan Lewis & Bockius LLP Philadelphia, PA 1701 Market St. Philadelphia, PA 19103-2721 215-963-5103 Fax: 215-963-5001 Email: brian.shaffer@morganlewis.com <i>Representing Guerbet, LLC, Liebel-Flarsheim Company LLC</i></p> <p>Christina Marie Vitale Morgan Lewis & Bockius LLP- Houston, TX 1000 Louisiana St., Ste. 4000 Houston, TX 77002 713-890-5000 Fax: 713-890-5001 Email: christina.vitale@morganlewis.com <i>Representing Guerbet, LLC, Liebel-Flarsheim Company LLC</i></p> <p>Kevin Michael Benedicto</p>

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3.	<p>Susan Fischer v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Corporation; Bayer HealthCare LLC; Bracco Diagnostics, Inc.; Guerbet LLC; Mallinckrodt Inc.; Mallinckrodt LLC; and Liebel-Flarsheim Company LLC D. Arizona 2:18-01778</p>	<p>Curt William Clausen Clausen & Williamson PLLC 2999 N 44th St., Ste. 318 Phoenix, AZ 85018-7520 602-285-4450 Fax: 602-285-4483 Email: curt@cwazlw.com</p> <p>Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 twalburg@cutterlaw.com</p>	<p>Bracco Diagnostics, Inc. CT Corporation 818 W 7th St Ste 930 Los Angeles, CA 90017</p> <p>Guerbet, LLC CT Corporation 818 W Seventh Street, Suite 930 Los Angeles, CA 90017</p> <p>Mallinckrodt Inc. CT Corporation 818 West Seventh Street, Suite 930 Los Angeles, CA 90017</p> <p>Mallinckrodt LLC CT Corporation 818 West Seventh Street, Suite 930 Los Angeles, CA 90017</p> <p>Liebel-Flarsheim Company CT Corporation 818 West Seventh Street, Suite 930 Los Angeles, CA 90017</p>
4.	<p>Kathleen Geisse, Ph.D., Curtis Ulleseit and Lisa Wehlmann v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Pharma AG, formerly known as Bayer Schering Pharma AG; Bayer Corporation; Bayer HealthCare LLC; McKesson Corporation; Merry X-Ray Chemical Corporation; and Does 1 through 20, inclusive N.D. California 3:17-07026</p>	<p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com</p> <p>Kristen K. Barton Gomez Trial Attorneys 655 W Broadway Suite 1700 San Diego, CA 92101 619-237-3490 Fax: 619-237-3496 Email: kbaron@gomeztrialattorneys.com</p>	<p>Emma Elizabeth Garrison Wheeler Trigg O'Donnell LLP 370 17th Street, Ste. 4300 Denver, CO 80202 303-244-1800 Fax: 303-244-1879 garrison@wtotrial.com <i>Counsel for McKesson Corporation</i></p> <p>Shoba Dandillaya Thomas Ailbe Rector Lewis Brisbois Bisgaard & Smith LLP 333 Bush St., Ste. 1100 San Francisco, CA 94014 415-362-2580 Fax: 415-432-0882 Thomas.rector@lewisbrisbois.com Shoba.dandillaya@lewisbrisbois.com <i>Counsel for Merry X-Ray Chemical Corporation</i></p>

5.	<p>Patricia Young v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Pharma AG; Bayer Corporation; Bayer HealthCare LLC; McKesson Corporation; McKesson Medical-Surgical Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive N.D. California 2:18-00811</p>	<p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com</p>	<p>Emma Elizabeth Garrison Wheeler Trigg O'Donnell LLP 370 17th Street, Ste. 4300 Denver, CO 80202 303-244-1800 Fax: 303-244-1879 garrison@wtotrial.com <i>Counsel for McKesson Corporation</i></p> <p>Thomas Ailbe Rector Shoba Dandillaya Lewis Brisbois Bisgaard & Smith LLP 333 Bush St., Ste. 1100 San Francisco, CA 94014 415-362-2580 Fax: 415-434-0882 Thomas.rector@lewisbrisbois.com Shoba.dandillaya@lewisbrisbois.com <i>Counsel for Merry X-Ray Chemical Corporation</i></p> <p>McKesson Medical-Surgical, Inc. CSC Lawyers, Inc. 2710 Gateway Oaks Drive, 150N Sacramento, CA 95833</p>
6.	<p>Beth Winkler v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Corporation; Bayer HealthCare LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; and Does 1 through 50, inclusive N.D. California 3:18-03077</p>	<p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com</p>	<p>Emma Elizabeth Garrison Wheeler Trigg O'Donnell LLP 370 17th Street, Ste. 4300 Denver, CO 80202 303-244-1800 Fax: 303-244-1879 garrison@wtotrial.com <i>Counsel for McKesson Corporation; McKesson Medical-Surgical, Inc.</i></p>

7.	Joseph Lewis v. Bayer HealthCare Pharmaceuticals, Inc.; Bayer Corporation; Bayer HealthCare LLC and Does 1 through 20, inclusive N.D, California No. 3:18-04146	<p>Kristen K. Barton John H. Gomez Gomez Trial Attorneys 655 W Broadway, Ste. 1700 San Diego, CA 92101 619-237-3490 Fax: 619-237-3496 kbaron@gomeztrialattorneys.com john@gomeztrialattorneys.com</p> <p>Andrew Douglas Welker Edward A. Wallace Wexler Wallace LLP 55 West Monroe St., Ste. 3300 Chicago, IL 60603 312-346-222 Fax: 312-346-0022 adw@wexlerwallace.com eaw@wexlerwallace.com</p>	
8.	Gena Norris and Chuck Norris, also known as Carlos Ray Norris v. McKesson Corporation; McKesson Medical-Surgical, Inc.; Bracco Diagnostics, Inc.; Bracco Research USA, Inc.; Bipso GMBH; Bracco Imaging, S.P.A.; Bracco Group; Bracco Imaging Group; Takeda GMBH; Acist Medical Systems, Inc., dba Acist Silicon Valley; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive N.D. California	<p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com</p>	<p>Emma Elizabeth Garrison Wheeler Trigg O'Donnell LLP 370 17th Street, Ste. 4300 Denver, CO 80202 303-244-1800 Fax: 303-244-1879 garrison@wtotrial.com <i>Counsel for McKesson Corporation; McKesson Medical-Surgical, Inc.</i></p> <p>Brian Joseph Mooney Peter J. Turcotte Gordon & Rees LLP 275 Battery St., Ste 2000 Embarcadero Center West San Francisco, CA 94111 415-986-5900 Fax: 415-986-8054 bmooney@gordonrees.com pturcotte@grsm.com <i>Counsel for Bracco Diagnostics, Inc.</i></p> <p>Paul Scott Penticuff Thomas Sterchi Baker Sterchi Cowden and Rice LLC 2400 Pershing Road, Ste. 500 Kansas City, MO 64108</p>

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9.	Debra Javens v. GE Healthcare and General Electric Company D. Delaware No. 1:18-01030	<p>Kim Dougherty ANDRUS WAGSTAFF PC 19 Belmont Street South Easton, MA 02375 Tel: (508) 230-2700 Fax: (303) 376-6361 Email: kim.dougherty@andruswagstaff.com</p> <p>C. Brooks Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com twalburg@cutterlaw.com</p>	<p>Christopher B. Parkerson Campbell, Campbell, Edwards, & Conroy, PC One Constitution Center Third Floor Boston, MA 02129 617-241-3075 Email: cparkerson@campbell-trial-lawyers.com <i>Representing GE Healthcare, Inc., and General Electric Company</i></p>
10.	Marcia Sabol v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Pharma AG, formerly known as Bayer Schering Pharma AG; Bayer Corporation; Bayer HealthCare LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive M.D. Florida No. 8:18-00850	<p>Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 mcutter@cutterlaw.com twalburg@cutterlaw.com</p> <p>R. Jason Richards Aylstock, Witkin, Kreis & Overholtz, PLLC 17 E Main St Ste 200 Pensacola, FL 32502-5998 850/916-7450 Fax: 850-916-7449 Email: jrichards@awkolaw.com</p>	<p>Merry X-Ray Chemical Corporation 4444 Viewridge Ave San Diego, CA 92123</p> <p>McKesson Corporation McKesson Medical-Surgical, Inc. CSC lawyers, Inc. 2710 Gateway Oaks Drive, 150 N Sacramento, CA 95833</p>
11.	Nikki Esserman v. Bracco Diagnostics, Inc.; Bracco Research USA, Inc.; Bipso GMBH; Bracco Imaging, S.P.A.; Bracco	<p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400</p>	<p>Brian Mooney James Reginald Reilly Kevin Liu Peter J Turcotte Gordon & Rees, LLP 275 Battery Street Suite 2000</p>

<p>Group; Bracco Imaging Group; Takeda GMBH; Acist Medical Systems, Inc., dba Acist Silicon Valley; Guerbet LLC; Mallinckrodt Inc.; Mallinckrodt LLC; Enterprise Holdings, Inc. dba Mallinckrodt Pharmaceuticals; Mallinckrodt Manufacturing LLC; Liebel-Flarsheim Company LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive S.D. Florida No. 1:18-21396</p>	<p>Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com</p> <p>R. Jason Richards Aylstock, Witkin, Kreis & Overholtz, PLLC 17 E Main St Ste 200 Pensacola, FL 32502-5998 850/916-7450 Fax: 850-916-7449 Email: jrichards@awkolaw.com</p>	<p>San Francisco, CA 94111 <i>Representing Bracco Diagnostics, Inc</i></p> <p>Jordon Scott Cohen Wicker Smith Tutan O'Hara McCoy Graham & Ford 515 E Las Olas Blvd., Suite 1400 Suntrust Bank Fort Lauderdale, FL 33301 954-467-6405 Fax: 760-93533 Email: jcohen@wickersmith.com <i>Representing Bracco Diagnostics, Inc.</i></p> <p>Paul Scott Penticuff Thomas N. Sterchi Baker Sterchi Cowden and Rice, LLC 2400 Pershing Rd, Suite 500 Kansas City, MO 64108 penticuff@bscr-law.com sterchi@bscr-law.com <i>Representing Bracco Diagnostics, Inc.</i></p> <p>Kevin Michael Benedicto Morgan, Lewis and Bockius LLP One Market, Spear Street Tower San Francisco, CA 94108 <i>Representing Guerbet, LLC, Liebel-Flarsheim Company LLC</i></p> <p>Michael A. De Giovanni Morgan, Lewis, Bockius LLP 200 S Biscayne Blvd, Suite 5300 Miami, FL 33131 Michael.degiovanni@morganlewis.com <i>Representing Guerbet, LLC, Liebel-Flarsheim Company LLC</i></p> <p>Brian W. Shaffer Morgan, Lewis and Bockius LLP 1701 Market Street Philadelphia, PA 19103 215-963-5000</p>
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12.	<p>Gail Montani v. Bracco Diagnostics, Inc.; Bracco Research USA, Inc.; Bipso GMBH; Bracco Imaging, S.P.A.; Bracco Group; Bracco Imaging Group; Takeda GMBH; Acist Medical Systems, Inc., dba Acist Silicon Valley; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive S.D. Florida No.</p>	<p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com</p> <p>Robert Jason Richards Aylstock Witkin Kreis & Overholtz PLLC 803 N Palafox Street Pensacola, FL 32501 850-202-1010 Fax: 850-916-7449 jrichards@awkolaw.com</p>	<p>Brian Joseph Mooney James Reginald Reilly Kevin Liu Peter J. Turcotte Gordon & Rees LLP 275 Battery St., Ste 2000 Embarcadero Center West San Francisco, CA 94111 415-986-5900 Fax: 415-986-8054 bmooney@gordonrees.com jreilly@gordonrees.com pturcotte@grsm.com <i>Counsel for Bracco Diagnostics, Inc.</i></p> <p>Jordan Scott Cohen Wicker Smith Tutan O'Hara McCoy Graham & Ford 515 E Las Olas Blvd., Ste. 1400 Suntrust Bank Fort Lauderdale, FL 33301 954-467-6405 Fax: 954-760-9353</p>

<p>4:18-10054</p>		<p>jcohen@wickersmith.com <i>Counsel for Bracco Diagnostics, Inc.</i></p> <p>Paul Scott Penticuff Thomas Sterchi Baker Sterchi Cowden and Rice LLC 2400 Pershing Road, Ste. 500 Kansas City, MO 64108 816-471-2121 Fax: 816-472-0288 penticuff@bscr-law.com sterchi@bscr-law.com <i>Counsel for Bracco Diagnostics, Inc.</i></p> <p>Takeda GMBH 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831</p> <p>Bracco Research USA, Inc. 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831</p> <p>Bipso GMBH 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831</p> <p>Bracco Imaging, S.P. A 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831</p> <p>Bracco Group 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831</p> <p>Bracco Imaging Group 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831</p> <p>Acist Medical Systems, Inc. CT Corporation 818 W. 7th St, Suite 930 Los Angeles, CA 9007</p> <p>Merry X-Ray Chemical Corporation 4444 Viewridge Ave San Diego, CA 92123</p>
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			McKesson Corporation McKesson Medical-Surgical, Inc. CSC Lawyers, Inc. 2710 Gateway Oaks Drive, 150N Sacramento, CA 95833
13.	Michael Gerrity and Judy Gerrity v. McKesson Corporation; McKesson Medical-Surgical, Inc.; Bracco Diagnostics, Inc.; Bracco Research USA, Inc.; Bipso GMBH; Bracco Imaging, S.P.A.; Bracco Group; Bracco Imaging Group; Takeda GMBH; Acist Medical Systems, Inc., dba Acist Silicon Valley; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive D. Kansas No. 2:18-0224	R. Douglas Gentile Rachel Nelson Boden Randall L. Rhodes Rouse Frets Gentile Rhodes LLC 5250 W. 116th Place, Ste. 400 Leawood, KS 66211 913-387-1609 Fax: 913-928-6739 dgentile@rousefrets.com rboden@rousefrets.com rrhodes@rousefrets.com Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 twalburg@cutterlaw.com	Craig R. May Wheeler Trigg O'Donnell LLP 370 17th Street, Ste. 4500 Denver, CO 80202 303-244-1800 Fax: 303-244-1879 may@wtotrial.com <i>Counsel for McKesson Corporation;</i> Angela M. Higgins Paul Scott Penticuff Thomas Sterchi Baker Sterchi Cowden and Rice LLC 2400 Pershing Road, Ste. 500 Kansas City, MO 64108 816-471-2121 Fax: 816-472-0288 penticuff@bscr-law.com sterchi@bscr-law.com higgins@bscr-law.com <i>Counsel for Bracco Diagnostics, Inc.</i>
14.	Stephen Goodell v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Pharma AG, formerly known as Bayer Schering Pharma AG; Bayer Corporation; Bayer HealthCare LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray	Kimberly A. Dougherty Andrus Wagstaff PC 19 Belmont Street South Easton, MA 02375 508-230-2700 Kim.dougherty@andruswagsta ff.com C. Brooks Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com	

	Chemical Corporation; and Does 1 through 50, inclusive D. Massachusetts No. 1:18-10694	twalburg@cutterlaw.com	
15.	Kimberly Ann Viruet v. Bayer HealthCare Pharmaceuticals Inc., Bayer Corporation, Bayer HealthCare LLC, GE Healthcare Inc., and General Electric Company D. Massachusetts No. 1:18-11611	Kimberly A. Dougherty Andrus Wagstaff PC 19 Belmont Street South Easton, MA 02375 508-230-2700 Kim.dougherty@andruswagstaff.com Anne M. Valentine (Pro Hac Vice) LEESEBERG & VALENTINE 175 South Third Street Columbus, OH 43215 Tel: (614) 221-2223 Fax: (614) 221-3106 avalentine@leesebergvalentine.com	GE HEALTHCARE INC.; and GENERAL ELECTRIC COMPANY 191 Rosa Parks St.,12W-02-12 Cincinnati, OH 45202
16.	Denise McGrath v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Pharma AG, formerly known as Bayer Schering Pharma AG; Bayer Corporation; Bayer HealthCare LLC; Bracco Diagnostics, Inc.; Bracco Research USA, Inc.; Bipso GMBH; Bracco Imaging, S.P.A.; Bracco Group; Bracco Imaging Group; Takeda GMBH; Acist Medical Systems, Inc., dba	C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com	Brian Joseph Mooney James Reginald Reilly Peter J. Turcotte Gordon & Rees LLP 275 Battery St., Ste 2000 Embarcadero Center West San Francisco, CA 94111 415-986-5900 Fax: 415-986-8054 bmooney@gordonrees.com jreilly@gordonrees.com pturcotte@grsm.com <i>Counsel for Bracco Diagnostics, Inc.</i> Melissa Dziak Cipriani & Werner PC 99 Collier St., Ste. 100 Binghamton, NY 13901 607-770-1840 Fax: 607-821-3573 mdziak@c-wlaw.com <i>Counsel for Bracco Diagnostics, Inc.</i>

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<p>17.</p>	<p>Marcin Zelazny v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Pharma AG, formerly known as Bayer Schering Pharma AG; Bayer Corporation; Bayer HealthCare LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive S.D. New York</p>	<p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com</p>	<p>Habib Nasrullah Wheeler, Trigg & O'Donnell, LLP 370 17th Street, Ste. 4500 Denver, CO 80202 303-244-1800 nasrullah@wtotrial.com <i>Counsel for McKesson Corporation; McKesson Medical-Surgical Inc.</i></p> <p>Merry X-Ray Chemical Corporation 4444 Viewridge Ave San Diego, CA 92123</p>

	No. 1:18-03246		
18.	Lori Combs v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Pharma AG, formerly known as Bayer Schering Pharma AG; Bayer Corporation; Bayer HealthCare LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive N.D. Ohio No. 1:18-00802	Craig S. Tuttle Leesberg & Valentine 175 South Third Street Columbus, OH 43215 614-221-2223 Fax: 614-221-3106 ctuttle@leesebergvalentine.com C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com	McKesson Corporation McKesson Medical-Surgical, Inc. CSC Lawyers, Inc. 2710 Gateway Oaks Drive, 150N Sacramento, CA 95833
19.	Donna White, Individually and as Administrator of the Estate of Constance Lowe v. GE Healthcare Inc., and GE Healthcare AS S.D. Ohio 1:17- 00212	Donna White 1809 Gradenia #5 Royal Oak, MI 48067 Pro Se	Catherine Darcy Copeland Jalandoni Porter Wright Morris & Arthur LLP 41 S. High St Columbus, OH 43215 614-227-2024 Fax: 614-227-2100 djalandoni@porterwright.com <i>Counsel for GE Healthcare, Inc.</i> J Phillip Calabrese Porter Wright Morris & Arthur LLP 950 Main Ave. Cleveland, OH 44113 216-443-2504 Fax: 216-443-9001 pcalabrese@porterwright.com <i>Counsel for GE Healthcare, Inc.</i> John W. Elder Taylor A. Williams 900 South Gay Street, Ste. 2200

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20.	<p>Captain Sean Miller (Ret.) v. GE Healthcare Inc.; GE Healthcare AS; General Electric Company; Guerbet LLC; Mallinckrodt Inc.; Mallinckrodt LLC; Enterprise Holdings, Inc. dba Mallinckrodt Pharmaceuticals; Mallinckrodt Manufacturing LLC; Liebel-Flarsheim Company LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50, inclusive S.D. Ohio No. 3:18-00113</p>	<p>Anne M. Valentine Leeseberg & Valentine 175 S Third Street, PH-1 Columbus, OH 43215 614-221-2223 Fax: 614-221-3106 avalentine@leesebergvalentine.com</p> <p>C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com</p>	<p>J Phillip Calabrese Justin James Joyce Porter Wright Morris & Arthur LLP 950 Main Ave. Cleveland, OH 44113 216-443-2504 Fax: 216-443-9001 pcalabrese@porterwright.com jjoyce@porterwright.com <i>Counsel for GE Healthcare Inc.; GE Healthcare AS; General Electric Company</i></p> <p>Jeremy A. Moseley Michael L. O'Donnell Wheeler Trigg O'Donnell LLP 370 17th Street, Ste. 4500 Denver, CO 80202 303-244-1800 Fax: 303-244-1879 moseley@wtotrial.com odonnell@wtotrial.com <i>Counsel for GE Healthcare Inc.; GE Healthcare AS; General Electric Company</i></p> <p>Wendy West Feinstein Brian W Shaffer Morgan, Lewis & Bockius LLP One Oxford Centre, 32nd Floor Pittsburg, PA 15219 412-560-7455 Fax: 412-560-7001 Wendy.feinstein@morganlewis.com Brian.shaffer@morganlewis.com <i>Counsel for Guerbet LLC; Liebel-Flarsheim Company LLC</i></p> <p>Jamie Kendall</p>

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			Mallinckrodt Manufacturing LLC, Enterprise Holdings, Inc. dba Mallinckrodt Pharmaceuticals 675 McDonnell Blvd Hazelwood, MO 63042
21.	Dawn Walton v. GE Healthcare Inc.; GE Healthcare AS; General Electric Company; McKesson Corporation; McKesson Medical-Surgical, Inc.; Merry X-Ray Chemical Corporation; and Does 1 through 50 D. Oregon No. 2:18-00605	C. Brooks Cutter Margot P. Cutter Todd A. Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9400 Fax: (916) 588-9330 bcutter@cutterlaw.com mcutter@cutterlaw.com twalburg@cutterlaw.com Leslie W. O’Leary Johnson Johnson Lucas & Middleton PC 975 Oak Street, Ste. 1050 Eugene, OR 97401 541-484-2434 Fax: 541-484—0882 lOLEARY@JUSTICELAWYERS.COM	Jeremy A. Moseley Michael L. O’Donnell Wheeler Trigg O’Donnell LLP 370 17 th Street, Ste. 4500 Denver, CO 80202 303-244-1800 Fax: 303-244-1879 moseley@wtotrial.com odonnell@wtotrial.com <i>Counsel for GE Healthcare Inc.; GE Healthcare AS; General Electric Company</i> Nancy M. Erfle Gordon, Rees Scully Mansukhani LLP 121 SW Morrison St., Ste. 1575 Portland, OR 97204 503-222-1075 Fax: 503-616-3600 nerfle@grsm.com <i>Counsel for GE Healthcare AS</i> Merry X-Ray Chemical Corporation 4444 Viewridge Ave San Diego, CA 92123 McKesson Corporation McKesson Medical-Surgical, Inc. CSC Lawyers, Inc. 2710 Gateway Oaks Drive, 150N Sacramento, CA 95833

22.	Thelma Kaye Hollifield v. GE Healthcare Inc.; General Electric Company; Bayer HealthCare Pharmaceuticals Inc.; Bayer Corporation; Bayer HealthCare LLC; and McKesson Corporation D. Mass. No. 1:18-cv-11626	Kimberly A. Dougherty Andrus Wagstaff PC 19 Belmont Street South Easton, MA 02375 (508) 230-2700 Email: kim.dougherty@andruswagstaff.com Todd A. Walburg CUTTER LAW, P.C. 401 Watt Avenue Sacramento, CA 95864 Telephone: (916) 290-9440 Facsimile: (916) 588-9330 Email: twalburg@cutterlaw.com	GE HEALTHCARE INC.; and GENERAL ELECTRIC COMPANY 191 Rosa Parks St.,12W-02-12 Cincinnati, OH 45202 McKesson Corporation CSC Lawyers, Inc. 2710 Gateway Oaks Drive, 150N Sacramento, CA 95833
23.	Pearl Pierik and John Pierik v. GE Healthcare Inc.; General Electric Company; GE Healthcare AS, Bracco Diagnostics, Inc.; and McKesson Corporation D. Mass. No. 1:18-cv-11709	Kimberly A. Dougherty Andrus Wagstaff PC 19 Belmont Street South Easton, MA 02375 (508) 230-2700 Email: kim.dougherty@andruswagstaff.com	GE HEALTHCARE INC.; and GENERAL ELECTRIC COMPANY, GE Healthcare AS 191 Rosa Parks St.,12W-02-12 Cincinnati, OH 45202 Bracco Diagnostics, Inc. 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831 McKesson Corporation CSC Lawyers, Inc. 2710 Gateway Oaks Drive, 150N Sacramento, CA 95833
24.	Jane Doe v. Bayer HealthCare Pharmaceuticals, Inc.; Bayer Corporation; Bayer HealthCare LLC; McKesson Corporation; McKesson Medical-Surgical, Inc.; and Does 1 through 50, inclusive N.D. Cal.	Curtis Brooks Cutter Todd Alan Walburg Margot P. Cutter Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9440 Fax: (916) 588-9330 Email: bcutter@cutterlaw.com Email: twalburg@cutterlaw.com Email: mcutter@cutterlaw.com	Emma Elizabeth Garrison Wheeler Trigg O'Donnell LLP 370 Seventeenth Street, Suite 4500 Denver, CO 80202 (303) 244-1847 Fax: (303) 244-1879 Email: garrison@wtotrial.com <i>Attorney for McKesson Corporation and McKesson Medical-Surgical, Inc.</i>

	No. 3:18-cv-04568		
25.	Ingeborg Klein and Karin Klein v. Bayer HealthCare Pharmaceuticals Inc., Bayer Corporation; Bayer HealthCare LLC; Bracco Diagnostics, Inc.; Guerbet LLC; Mallinkrodt Inc.; Mallinkrodt LLC; and Liebel-Flarsheim Company LLC D. Nev. No. 2:18-cv-01424	Nicholas J. Drakulich Robert J. Drakulich The Drakulich Firm, A Professional Law Corporation 245 East Liberty Street, Suite 510 Reno, NV 89501 (775) 322-0673 Email: njd@draklaw.com Email: rjd@draklaw.com Todd Alan Walburg Cutter Law, P.C. 401 Watt Avenue Sacramento, CA 95864 (916) 290-9440 Fax: (916) 588-9330 Email: twalburg@cutterlaw.com	Bracco Diagnostics, Inc. 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831 Mallinckrodt Manufacturing LLC, Enterprise Holdings, Inc. dba 675 McDonnell Blvd. Hazelwood, MO 63042 Liebel-Flarsheim Company, Guerbet, Inc. CT Corporation 818 W Seventh St., Ste. 930 Los Angeles, CA 90017
26.	Toby Welty v. Bracco Diagnostics, Inc., and McKesson Corporation S.D. Ill. No. 3:18-cv-01460	Andrew D. Welker Wexler Wallace LLP 55 West Monroe Suite 3300 Chicago, IL 60603 312-346-2222 Fax: 312-346-0022 Email: adw@wexlerwallace.com Edward A. Wallace Wexler Wallace LLP Generally Admitted 55 West Monroe Street Suite 3300 Chicago, IL 60603 312-346-2222 Email:	Bracco Diagnostics, Inc. 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831 McKesson Corporation CSC Lawyers, Inc. 2710 Gateway Oaks Drive, 150N Sacramento, CA 95833

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27.	<p>Reginald Brown v. Bracco Diagnostics, Inc. N.D. Cal. No. 5:18-cv-05277</p>	<p>Trevor Bruce Rockstad Davis & Crump, PC 2601 14th Street Gulfport, MS 39501 (228) 863-6000 Fax: (228) 864-0907 Email: trevor.rockstad@daviscrump.com</p>	<p>Bracco Diagnostics, Inc. 259 Prospect Plains Road, Bldg. H Monroe Township, NJ 08831</p>
28.	<p>Amelia Peterson v. Bayer HealthCare Pharmaceuticals Inc., Bayer Pharma AG, Bayer Oy D. Ariz. No. 2:18-cv-02739</p>	<p>C. Lincoln Combs Gallagher & Kennedy PA 2575 E Camelback Rd., Ste. 1100 Phoenix, AZ 85016 (602) 530-8000 Fax: (602) 530-8500 Email: lincoln.combs@gknet.com</p> <p>Martin D. Crump Davis & Crump, PC 2601 14th Street Gulfport, MS 39501 (228) 863-6000 Fax: (228) 864-0907 Email: martin.crump@daviscrump.com</p>	

29.	John M. Carney v. Guerbet LLC, Mallinckrodt Inc., Mallinckrodt LLC, and Liebel-Flarsheim Company LLC E.D. MO. No. 4:18-cv-01494	<p>Jeffrey R. Baron Benjamin L. Bailey P. Gregory Haddad Amy S. Rubin David L. Selby, II Bailey & Glasser, LLP 8012 Bonhomme Avenue, Suite 300 Clayton, MO 63105 Tel: (314) 863-5446 Fax: (314) 863-5483 Email: jbaron@baileyglasser.com Email: bbailey@baileyglasser.com Email: ghaddad@baileyglasser.com Email: arubin@baileyglasser.com Email: dselby@baileyglasser.com</p>	<p>Guerbet, LLC CT Corporation 818 W Seventh Street, Suite 930 Los Angeles, CA 90017</p> <p>Mallinckrodt Inc. CT Corporation 818 W Seventh Street, Suite 930 Los Angeles, CA 90017</p> <p>Mallinckrodt LLC CT Corporation 818 W Seventh Street, Suite 930 Los Angeles, CA 90017</p> <p>Liebel-Flarsheim Company CT Corporation 818 W Seventh Street, Suite 930 Los Angeles, CA 90017</p>
30.	Emily Dennis v. Bayer HealthCare Pharmaceuticals Inc.; Bayer Corporation; Bayer HealthCare LLC; Bracco Diagnostics Inc., and McKesson Corporation W.D.N.C No. 3:18-cv-00491	<p>Patrick M. Wallace Daniel Kent Bryson Whitfield Bryson & Mason, LLP 900 West Morgan Street Raleigh, NC 27603 (919) 600-5000 Fax: (919) 600-5035 Email: pat@wbmlp.com Email: dan@wbmlp.com</p> <p>Matthew R. McCarley Fears Nachawati, PLLC 4925 Greenville Avenue, Suite 715 Dallas, Texas 75206 Tel. (214) 890-0711 Fax (214) 890-0712 Email: mccarley@fnlawfirm.com</p>	<p>Bracco Diagnostics, Inc. CT Corporation 818 W 7th St. Ste. 930 Los Angeles, CA 90017</p> <p>McKesson Corporation CSC Lawyers, Inc. 2710 Gateway Oaks Drive, 150 N Sacramento, CA 95833</p>

/s/ Jennifer L. Greenblatt

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