

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

IN RE: PROTON-PUMP INHIBITOR PRODUCTS LIABILITY LITIGATION (NO. II) This Document Relates to: ALL ACTIONS	2:17-md-2789 (CCC)(MF) (MDL 2789) APRIL 22, 2020 TELEPHONIC STATUS CONFERENCE JOINT STATUS REPORT AND PROPOSED AGENDA
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The parties hereby submit their Joint Status Report and Proposed Agenda in advance of the April 22, 2020 Telephonic Status Conference.

I. STATUS REPORT

At the time of this filing, approximately 13,919 potentially related actions with 13,950 plaintiffs are pending in federal court.

Currently, approximately 85 state court actions/plaintiffs are pending in the Delaware Superior Court, New Castle County, before Judge Eric M. Davis, 68 state court actions/plaintiffs are pending in the Circuit Court of Cook County, Illinois before Judge Brendan A. O' Brien, 47 state court actions/plaintiffs are pending in a multicounty litigation ("MCL") in New Jersey state court in Atlantic County before Judge John C. Porto, and 22 actions/plaintiffs are pending in the Court of Common Pleas, Hamilton County, Ohio before Judge Sylvia Hendon.

II. PROPOSED AGENDA FOR APRIL 22, 2020 TELEPHONIC STATUS CONFERENCE

The Parties have met and conferred and propose the following Agenda:

- Update on Bellwether Trial Pool and Strike Process and Bellwether-specific issues:
 - Plaintiff-specific deficiencies;
 - Updating Defense Fact Sheets in accordance with CMO 22 and DFS Deferral Agreements between the parties;

- Tolling Motions to Dismiss
 - March 10, 2020 Order to Show Cause (Dkt. 562)
 - Dismissal of 67 Cases Without Response
 - Order on Plaintiff J. Weese Response to OTSC (Dkt. 562, 566, 567)
 - Proposed Orders to Show Cause for No POU and/or POI
 - 7 Carey, Danis & Lowe Plaintiffs (submitted by consent on April 9, 2020 for entry)
 - Meet/confer on 275 Weitz & Luxenberg Plaintiffs
- Proposed Case Management Order No. 9A (Resolution of "No PFS Cases");
- Unopposed Motions to Withdraw;
- Volume/Viability of 2020 Complaints
- PSC's Motion to Quash Non-Party Discovery Request [Dkt. Nos. 520, 534, 542, and 549];
- Effectuation of Dismissal of Novartis entities;
- Update on Discovery;
 - Update on Deposition Scheduling;
 - PSC's Proposed Order for Remote Depositions;
 - Status of Deposition Scheduling of Foreign Former AstraZeneca Employees Residing in Sweden;
 - PSC's Third Request for Production of Documents; and
- PSC's Open Motions to Challenge Privilege Claims [Dkt. Nos. 388 and 433].

III. TELEPHONIC MONITORING OF THE CASE MANAGEMENT CONFERENCE

For those counsel that wish to monitor the conference telephonically, the dial-in information is as follows:

Participant (listen only mode) dial-in info:

877-830-3587

Participant Automated CID: 774635

Conference ID/Program Title: PPIMDL

Note that the status conference is scheduled to begin at 11:00 a.m. eastern.

Dated: April 17, 2020