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August 10, 2023

Re: Application for Appointment of Leadership

Dear Judge Saris:

We respectfully submit the attached proposed Case Management Order (Exhibit A), which describes the plaintiffs' proposed leadership committee structure and incorporates the responsibilities and obligations of the committee.

In preparing this submission, we engaged in several group meetings and conferred with counsel who expressed an interest in a committee position and believe the proposed organization reflects a consensus among such counsel and includes, in multiple respects, a diverse group of attorneys. The proposed leadership committee includes 10 named attorneys from 10 separate law firms.

The attorneys included on the proposed leadership committee stand ready to assume the responsibility and obligation to act fairly, efficiently, and economically in the interests of all plaintiffs and plaintiffs' counsel to resolve this matter. Further, these attorneys have the requisite experience, commitment, and resources to litigate this action for the common benefit of all plaintiffs. This group of attorneys has spent considerable time and resources investigating the claims in this case. Collectively, this group represents hundreds of clients with claims for injuries attributable to failed hernia mesh implants manufactured by Defendants.

The attached biographies of the applicants (Exhibit B), demonstrate that this group is abundantly qualified to serve on the leadership committee. Further, we have conferred with Defendants, who do not object to the proposed Case Management Order.

We appreciate the Court's time and effort in making the final determination as to whether we will be appointed to the permanent positions.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'K. Stokes', written over a horizontal line.

Kelsey L. Stokes

Plaintiffs' Interim Co-Lead Counsel

Timothy M. O'Brien

Plaintiffs' Interim Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ Kelsey L. Stokes

Kelsey L. Stokes

Plaintiffs' Interim Co-Lead Counsel

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE: COVIDIEN HERNIA MESH
PRODUCTS LIABILITY LITIGATION
NO. II,**

This Document Relates To:

All Cases

MDL No. 1:22-md-03029-PBS

CASE MANAGEMENT ORDER NO. _____

This Court, having entered Case Management Order No. 1, through which it designated Plaintiffs' interim Co-Lead Counsel and interim Liaison Counsel, now has received from the interim Co-Leads, Plaintiffs' Application for Appointment of Leadership. Through this filing, this Court has reviewed interim Co-Leads' consensus recommendations as well as the qualifications of the proposed members of the leadership committee. The Court finds that consensus recommendations present a broad range of highly experienced and well-qualified counsel with diverse backgrounds and is satisfied that the recommended leadership committee will provide the Court with an effective plaintiffs' leadership group to advance this litigation in an efficient and just manner. This court, therefore, hereby **ORDERS**:

1. Scope of Order.

This Order shall apply to all cases currently pending in *IN RE: COVIDIEN HERNIA MESH PRODUCTS LIABILITY LITIGATION NO. II*, MDL No. 3029 and to all related actions that have been or will be originally filed in, transferred to, or removed to this Court and assigned thereto (collectively, "the MDL proceedings"). This Order is binding on all parties and their counsel in all cases currently pending or subsequently made part of the MDL proceedings.

2. Plaintiffs' Leadership Counsel Appointments.

The Court appoints the following counsel as Plaintiffs' Co-Lead Counsel, Liaison Counsel, and to the Plaintiffs' Executive Committee and Steering Committee.

A. Plaintiffs' Co-Lead Counsel.

Timothy M. O'Brien
Florida Bar No. 055565
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN,
BARR & MOUGEY, P.A.
316 South Baylen St., Ste. 600
Pensacola, FL 32502
Tel: (850) 435-7084
Fax: (850) 436-6084
tobrien@levinlaw.com

Kelsey L. Stokes
Texas Bar No. 24083912
FLEMING, NOLEN & JEZ, L.L.P.
2800 Post Oak Blvd., Suite 4000
Houston, TX 77056-6109
Tel: (713) 621-7944
Fax: (713) 621-9638
kelsey_stokes@fleming-law.com

B. Plaintiffs' Liaison Counsel.

Walter Kelley
BBO# 670525
4 Court Street
Plymouth, MA 02360
Tel: (617) 420-1111
Fax: (617) 830-0712
wkelley@realjustice.com

C. Plaintiffs' Executive Committee ("PEC").

Andrea Giovannone
Rueb Stoller Daniel
515 S. Figueroa Street, Suite 1550
Los Angeles, CA 90071
Tel: 866-225-5773
Fax: 855-203-2035

andrea@lawrsd.com

C. Brett Vaughn
Nigh Goldenberg Raso & Vaughn, PLLC
14 Ridge Square NW, Third Floor
Washington, D.C. 20016
Tel: 913-800-8518
Fax: 202-792-7927
bvaughn@nighgoldenberg.com

D. Plaintiffs' Steering Committee ("PSC").

The Plaintiffs' Steering Committee includes all of the above-appointed counsel as well as the following counsel:

Rosemarie Riddell Bogdan
Harding Mazzotti, LLP
1 Wall Street
Albany, NY 12212
Tel: 518-862-1200
rosemarie.bogdan@1800law1010.com

Sheila Bossier
Bossier & Associates, PLLC
1520 N. State Street
Jackson, MS 39202
Tel: 601-352-5450
Fax: 601-352-5452

Ashley Crowell
Babin Law, LLC
7014 E Camelback Road
Suite B100A, #77
Scottsdale, AZ 85251
Tel: 480-716-4477
Ashley.perea-crowell@babinlaws.com

Scott Fraser
McDonald Worley
1770 St. James Place, Suite 100
Houston, TX 77056
Tel: 713-523-5500
Scott@mcdonaldworley.com

Robert King
King Law
19 West Main Street, Suite 250
Rochester, NY 14614
Tel: 585-270-8882
rking@robertkinglawfirm.com

3. Designations, Funding, Future Changes in PSC Structure.

These designations are of a personal nature. This Court looks to these counsel to undertake personal responsibility to perform the designated functions and reserves the discretion to replace these counsel should they become unable or unwilling to do so, or should such other circumstances arise that warrant the same. This Court may amend or expand the PSC upon request of the PSC or on its own motion, if and as circumstances warrant. This Court is mindful that counsel within the PSC will be advance funding much of the common benefit litigation and that each of the members of the PSC have warranted their ability and willingness to advance fund the common litigation as determined are necessary by the Co-Leads. The failure of any member of the PSC to meet any of the advanced funding obligations as determined are necessary by the Co-Leads may constitute good cause for removal from the PSC.

4. Duties of Co-Lead Counsel

It shall be the responsibility of Co-Lead Counsel to provide oversight to and coordinate the responsibilities of the Executive Committee and PSC.

The duties of Co-Lead Counsel include, but are not limited to, the following:

Administration

- a. Call meetings of counsel for Plaintiffs for any appropriate purpose;
- b. perform any task necessary and proper for the PSC to accomplish its responsibilities as defined by the Court's orders, including organizing sub-

committees comprised of plaintiffs' attorneys not on the PSC and assigning them tasks consistent with the duties of the PSC;

- c. monitor the activities of the PEC and PSC and other co-counsel to ensure that schedules are met and unnecessary expenditures of time and funds are avoided;
- d. maintain adequate files of all pretrial matters, including establishing and maintaining a document or exhibit depository, in either real or virtual format, and having those documents available, under reasonable terms and conditions, for examination by all Plaintiffs or their attorneys in the MDL proceedings;
- e. provide periodic reports to non-PSC plaintiffs' counsel concerning the status of the litigation on no less than a quarterly basis;
- f. to coordinate services and filings;
- g. to maintain and distribute to co-counsel and to Defendants' Counsel an up-to-date service list;
- h. to receive and distribute all pleadings, all Court orders, and motions, provided all counsel shall continue to receive all notices through the Court's CM/ECF system;
- i. to maintain in conjunction with their accountant records of receipts and disbursements advanced by members of the PSC and received by the PSC and to report in writing to the PSC concerning disbursements and receipts;
- j. to act as the treasurer for any common benefit assessments and expenses, which shall be allocated to one of the Co-Lead Counsel, not both;

- k. to maintain and make available to all Plaintiffs' counsel of record at reasonable hours a complete file of all documents served by or upon each party (except such documents as may be available at a document depository);
- l. to be available for any telephone conferences convened by the Court and to communicate the substance of any such telephone conference to all other Plaintiffs' counsel; and
- m. perform such other functions as may be expressly authorized by further orders of the Court.

Discovery

- a. Initiate, coordinate, and conduct all pretrial discovery on behalf of all Plaintiffs who file civil actions in this Court or that are transferred to this Court pursuant to 28 U.S.C. § 1407 and which are consolidated with this multi-district litigation and are part of the MDL proceeding;
- b. develop and propose to the Court schedules for the commencement, execution, and completion of all discovery on behalf of all Plaintiffs;
- c. initiate, coordinate, and cause to be issued in the name of all Plaintiffs the necessary discovery requests, motions and subpoenas pertaining to any witnesses and documents needed to properly prepare for the pretrial discovery of relevant issues developed by the PSC. Similar requests, notices and subpoenas may be caused to be issued by the PSC upon written request by the individual attorney in order to assist him/her in preparation of the pretrial stages of his/her client's particular claims; and

- d. conduct all discovery in a coordinated and consolidated manner on behalf of and for the benefit of all Plaintiffs with the assistance from the PSC.

Motion Practice and Hearings

- a. Call meetings of counsel for plaintiffs for any appropriate purpose, including coordinating responses to questions of other parties or of the Court. Initiate proposals, suggestions, schedules, or joint briefs, and any other appropriate matter(s) pertaining to pretrial proceedings;
- b. submit and argue or designate other counsel to argue any motions presented to the Court or Magistrate Judge on behalf of all Plaintiffs as well as oppose when necessary any motions submitted by Defendants or third parties;
- c. examine or designate other counsel to examine witnesses and introduce evidence at hearings on behalf of Plaintiffs; and
- d. act or designate other counsel to act as spokesperson(s) for Plaintiffs at pretrial proceedings and in response to any inquiries by the Court.

Contact with Defense Counsel

- a. Initiate, coordinate and conduct (or designate others to do so) the requisite meet and confers with Defendants, confer with Defendants regarding procedural matters, and negotiate and enter into stipulations with Defendants regarding this litigation; and
- b. explore or designate other counsel to explore, develop and pursue settlement options with Defendants on behalf of Plaintiffs.

5. Communications with the Court.

All communications from Plaintiffs with the Court should be through Co-Lead Counsel or Liaison Counsel or, as requested by Co-Lead Counsel. If circumstances require direct correspondence with the Court by an individual counsel, copies of any such communications shall be simultaneously served upon Plaintiffs' Co-Lead Counsel or as otherwise delegated.

6. No Waiver of Privilege.

The Court recognizes that cooperation by and among plaintiffs' counsel is essential for the orderly and expeditious resolution of this litigation. The communication of information among and between plaintiffs' counsel shall not be deemed a waiver of the attorney-client privilege and/or the work product doctrine, if the privilege or doctrine is otherwise applicable, and all of such persons shall maintain the confidentiality of such communications. Cooperative efforts contemplated above shall in no way be used against any plaintiff by any defendant. Nothing contained in this provision shall be construed to limit the rights of any party or counsel to assert the attorney-client privilege or attorney work product doctrine.

7. Individual Claimants' Counsel Responsibility for Their Respective Clients.

Under no circumstances are Co-Lead Counsel, Liaison Counsel, the members of the PEC, or any member of the PSC responsible for filings, discovery, or any other issue or matter related to an individual plaintiff's case or claim. More specifically, Co-Lead Counsel, Liaison Counsel, the members of the PEC, or any member of the PSC are in no way responsible for the attorney-client relationship and the duties and responsibilities each individual attorney or law firm owe to their client(s) in the prosecution of their individual case(s).

IT IS SO ORDERED this ___ day of August, 2023.

EXHIBIT B



SHEILA M. BOSSIER, ESQ.

Legal Practice

Ms. Bossier has spent thirty years litigating hundreds of complex civil state court and federal court cases throughout the country, involving a broad range of legal issues. She has served as lead counsel in defective drug, medical device, toxic tort, environmental contamination, professional liability, medical malpractice and trucking accident cases, which resulted in favorable jury verdicts and monetary recoveries for many individual clients. Of note, Ms. Bossier was lead trial counsel in an environmental contamination case involving hundreds of residents of Crystal Springs, Mississippi, who were injured by PCB contamination, and after four long years of litigation, two multi-million dollar settlements were achieved with the culpable parties. Ms. Bossier's successes in mass tort products liability litigation include successfully settling numerous pharmaceutical drug cases following years of litigation, including Vioxx, Celebrex, Bextra, Seroquel, and Zyprexa. Ms. Bossier has litigated numerous defective medical device cases for plaintiffs over the years, including Medtronic defibrillators, Zimmer NexGen knee devices, DePuy ASR and Pinnacle hip devices, IVC Filters, Pelvic Mesh and Hernia Mesh devices. Ms. Bossier's involvement in the pelvic mesh litigation included appearing as lead counsel in the trial of a client severely injured by a Boston Scientific pelvic mesh product, which resulted in a 72 million dollar jury verdict in Dallas County, Texas. This verdict was recognized as one of the top 10 Products Liability verdicts of 2014.

Ms. Bossier's experience in defective drug and medical device litigation has been recognized by her peers and the judiciary, and has resulted in her serving in leadership roles in multi-district litigation across the country involving thousands of plaintiffs. Ms. Bossier's leadership roles have included appointment by Honorable Eldon Fallon, United States District Court Judge, Eastern District of Louisiana, to the Plaintiffs' Steering Committee in *In Re: Vioxx Products Liability Litigation*, MDL 1657; appointment by Honorable Rebecca R. Pallmeyer, United States District Court Judge, Northern District of Illinois, to the Plaintiff's Steering Committee in *In Re: Zimmer NexGen Knee Implant Products Liability Litigation*, MDL 2272; appointment by Honorable David G. Campbell to the Plaintiffs' Leadership Counsel in *In Re: Bard IVC Filters Products Liability Litigation*, MDL 2641. More recently, Ms. Bossier has been appointed to leadership positions in consolidated hernia mesh litigation, including the Plaintiffs' Steering Committee in *In Re: Proceed Mesh Litigation* (Proceed® Surgical Mesh and Proceed® Ventral Patch Hernia Mesh) and *In Re: Prolene Hernia Mesh System Litigation*, in Atlantic City, New Jersey.

In addition to representing injured individuals, since 2004, Ms. Bossier has been appointed Special Assistant Attorney General by the Attorney General of the State of Mississippi, serving as lead counsel in consumer protection litigation involving pharmaceutical drugs, Vioxx, Celebrex, and Actos. In addition, Ms. Bossier was retained by the State of Mississippi to pursue its claims against J&J/Ethicon and Boston Scientific Corporation related to the sale and distribution of pelvic mesh devices in Mississippi. Her work with the Attorney General's office to enforce Mississippi's Consumer Protection Act has resulted in significant monetary recovery for the State.

Finally, Ms. Bossier has been retained by numerous municipalities in the State of Mississippi to pursue claims against manufacturers and distributors of Opioids, to recover damages sustained by those entities as a result of the Opioid epidemic in the State. After many years of litigation, favorable resolution of many of these claims have occurred.

Biography

Sheila M. Bossier is a native of New Orleans, Louisiana. She was admitted to practice in Louisiana in 1989, after receiving her law degree from Tulane University School of Law. She practiced with a firm in New Orleans prior to relocating to Raleigh, North Carolina, where she was admitted to practice in 1990. In 1997, Ms. Bossier became a member of the Mississippi Bar, and for a number of years, she continued a litigation practice as a partner with a large Jackson, Mississippi law firm. Ms. Bossier has served in the position of National Coordinating counsel and National Trial Team Counsel for Fortune 500 companies in connection with various toxic tort cases nationwide.

In 2003, Ms. Bossier formed her own law firm, where she expanded her litigation practice to include the representation of thousands of victims of environmental contamination in the State of Mississippi, involving constituents such as PCBs, chlorinated solvents, and petroleum by-products, including benzene and lead.

Ms. Bossier has organized and spoken at various continuing legal education seminars relating to toxic torts, products liability, and other mass tort matters, and has appeared as a speaker on behalf of the American Bar Association, the Mississippi Bar Association, and the Capitol Area Bar Association related to these topics. For a number of years, Ms. Bossier served as a Vice-Chair of the ABA's Toxic Tort and Environmental Law Committee.

In 2015, Ms. Bossier was awarded membership in the Texas Lawyer's \$10 Million Dollar Club related to her representation of the Plaintiffs in *Martha Salazar, et al. v. Boston Scientific Corporation*. In 2016 and 2017, Ms. Bossier was selected as a member of the National Trial Lawyers Top 100 Trial Lawyers. Additionally, since 2016, she has regularly been selected as a Super Lawyer of the Mid-South. Super Lawyers is a creation of Thomson Reuters, which explains at SuperLawyers.com: "Super Lawyers is a rating service of outstanding lawyers from more than 70 practice areas who have attained a high-degree of peer recognition and professional achievement. The selection process includes independent research, peer nominations and peer evaluations."

Legal Associations and Community Involvement

Ms. Bossier is a member of the American Bar Association, the Mississippi Bar Association, the Louisiana State Bar Association, the Capitol Area Bar Association and the American Association for Justice. She has been on the Board of the Mississippi College School of Law Child Advocacy Board, taught trial advocacy programs at Mississippi College Law School, and has served as a Troop Leader for the Girl Scouts of America. In 2007, she became a certified Mediator in the State of Mississippi.

In 2021, Ms. Bossier was selected to join the Fellows of the Mississippi Bar Foundation.

Ms. Bossier is licensed to practice law in Louisiana (1989), North Carolina (1990) and Mississippi (1997).



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To Whom It May Concern,

My name is Ashley Perea-Crowell and I respectfully submit the following papers to serve as my application to the PSC or PEC in the instant matter.

I. WILLINGNESS AND AVAILABILITY

Babin Law, LLC, is a trial law firm that focuses its mass tort practice on litigating matters wherein its lawyers serve in leadership roles. Thus, we understand the tremendous commitment of time and capital needed to move MDLs to resolution. Our firm's leadership has met multiple times to discuss this case and fully endorse my application to leadership.

Babin Law, LLC, is committed to ensuring that my schedule allows the time necessary to make valuable contributions as a PEC/PSC member. I too am aware of the significant personal time commitment that comes with such a position, and I am willing and able to commit the requisite time to move this litigation forward as effectively and efficiently as possible. I understand the extensive time, energy, teamwork, and focus required to litigate a case of this magnitude at the leadership level. I am willing and able to serve plaintiffs, leadership, and the court in this capacity.

As someone who has been working on hernia mesh dockets since 2017, I am enthusiastic about this litigation and ready to commit to working extensively on this case.

II. ABILITY TO WORK COOPERATIVELY WITH OTHERS

The ability to work cooperatively and manage projects is paramount in a case like this. I am a person that prides myself on my professionalism, diligence, and ability to work with and build strong, productive, well-managed teams capable of accomplishing tremendous goals. I can accommodate almost all leadership and work styles. In fact, I have worked with my colleagues that are seeking appointment to leadership in the instant case. I also have a history of cooperative problem solving with opposing counsel and courtroom personnel.

As a manager, I aim to be fair, firm, and consistent. As a team player, I enjoy collaborating with committees and the PEC/PSC to do whatever tasks need accomplishing to achieve the best results for our collective clients. I do not mind rolling up my sleeves and doing the hard work. I will not shy away from additional work to ensure we move this litigation forward and achieve the best possible results for our clients.

I do not fear challenging people or crucial conversations. Throughout my legal career, I have consistently demonstrated an ability to address people, issues, and challenges calmly and promptly. My work style is compatible with just about all demeanors. I have worked with diverse groups of people in both mass tort proceedings and in all manners of professional organizations.

III. PROFESSIONAL BACKGROUND

While this would be my first official PSC or PEC appointment, I am ready for the challenge. I currently manage Babin Law's hernia mesh docket, with thousand of active clients, and I have considerable experience with defective mesh products. For the past decade, I have focused my career on representing plaintiffs in all types of highly complex litigation matters, including multi-district litigations and mass tort product liability matters.

In *In Re: Bard IVC Filters*, as well as the state court consolidation for Bard IVC filters, I served on the Bellwether trial teams, the Law and Motions Committee, and the Trial Preservation Package Committees. Additionally, for the past five years, I have worked with and mentored new lawyers in my previous firm for many litigations, including hernia mesh, metal-on-metal hip implants, Taxotere, Roundup, sex trafficking, and sex abuse litigations.

Moreover, I am familiar with all stages of litigation in an MDL, including early case theory development; identification and coordination of general and case-specific causation experts; case-specific workup; case investigation; drafting complaints and other pleadings; all aspects of discovery; motion practice; trial practice; and global settlements and disbursements, including lien resolution and structuring of settlement funds. I have first chair trial experience and have litigated cases post judgment through the appellate process.

Moreover, I can draw from the experience of my colleagues at Babin Law, LLC, who have leadership appointments in many MDLs and other complex litigations. Currently, our attorneys have leadership positions in the following litigations:

Valsartan MDL, Bard Hernia Mesh MDL, Boy Scouts of America bankruptcy, NEC MDL, CPAP MDL, Hair Relaxer MDL. We are also considered by many the country's leading attorneys for sex trafficking litigation against the hotel industry. Our lawyers have also performed substantive common benefit work in other MDLs including Benicar, Xarelto, Opiates, Invokana, and Bair Hugger.

My firm believes that my hard work and dedication to the legal practice make me a deserving candidate for appointment to the PEC or PSC. If given the opportunity, I look forward to ensuring I carry out my responsibilities diligently, industriously, and professionally. With my experience, I am confident in my abilities to advocate for the plaintiffs, and to help effectively shepherd this litigation towards resolution.

IV. ACCESS TO SUFFICIENT RESOURCES TO ADVANCE THE LITIGATION IN A TIMELY MANNER

Babin Law, LLC, understands the financial requirement of a PEC/PSC appointment. Babin Law, LLC, has the ability to fund any assessments required to further the litigation without risking financial hardship. I have the full support of my firm.

V. DIVERSITY

Along with my professional experience, I am uniquely qualified to serve in leadership because I will add to the diversity of the team. "[D]iversity often enhances the quality of the decision-making process and results." George Washington University School of Law, *Inclusivity and Excellence: Guidelines and Best Practices for Judges Appointing Lawyers to Leadership Positions in MDL and Class Action Litigation* (September 2020). Yet, historically, women and minority lawyers have not been appointed to leadership positions at rates proportionate to their representation in the plaintiffs' bar generally. *Id.*, see also Jaime Dodge, *Facilitating Judging: Organizational Design in Mass-Multidistrict Litigation*, 64 EMORY L.J. ____ (2014) (presenting empirical data showing a continuing gender gap in appointments). Research also shows that having a mix of experienced and new players enhances creativity and innovation, leads to better decision making and problem solving, and promotes discussion of novel concepts raised by those who historically have not been in leadership. Elizabeth Chamblee Burch, *Judging Multidistrict Litigation*, 90 N.Y.U. L. REV. 1 (2015), available at <https://www.nyulawreview.org/issues/volume-90-number-1/judging-multidistrict-litigation>.

Accordingly, as a diverse, Hispanic female candidate, I can make unique contributions to the PEC/PSC. My ability to work on teams and complete projects makes me an excellent candidate for the PEC/PSC. I am confident that my colleagues at other firms will agree.

VI. CONCLUSION

For the reasons stated herein, I respectfully ask for appointment to the PEC/PSC.

Sincerely,

Ashley Perea-Crowell, Esq.



Scott Fraser, Managing Mass Tort Attorney

Scott Fraser joined the firm of McDonald Worley in 2018. Mr. Fraser is dedicated to several McDonald Worley mass tort dockets, including Hernia Mesh, 3M Earplug Litigation, Transvaginal Mesh, IVC Filter, Invokana, and more. Prior to joining the firm, he worked for Junell & Associates and Potts Law Firm, LLP, as the lead attorney for client communication for the transvaginal mesh docket – a nationwide settlement involving 60,000 clients. Mr. Fraser also assisted in the administration and processing of that docket.

Mr. Fraser's TVM settlement and litigation experience led to his specialization in hernia mesh litigation, a subject matter in which he has counseled many attorneys nationwide regarding filing strategy, case evaluation, and the science on various hernia mesh products. His hard work, passion, and dedication in hernia mesh litigation led to his appointment to the Plaintiff Steering Committee ("PSC") for both MCL 630, *In re: Proceed Mesh Litigation*, and MCL 633, *In re: Prolene Hernia Mesh System Litigation*. There, Mr. Fraser has spent hundreds of hours working on discovery projects, corporate document review, custodial file reviews, and assisted with depositions for the benefit of Plaintiffs nationwide. Mr. Fraser also assisted various subcommittees for the hernia mesh litigation against C.R. Bard in MDL No. 2846, *In Re Davol, Inc./C.R. Bard, Inc., Polypropylene Hernia Mesh Products Liability Litigation*. Mr. Fraser again conducted important document review assignments of custodians, took several depositions, and assisted the Bard trial team during the bellwether trial in completing various assignments.

Mr. Fraser is an active member of the legal community in Houston, Texas, and nationwide. He serves as an adjunct professor at South Texas College of Law Houston in the subject matters of alternative dispute resolution with an emphasis in negotiation. While waiting for his bar exam results in 2014, Mr. Fraser performed over 200 hours of pro bono legal services at the Randal O. Sorrels Legal clinic to provide access to legal services for individuals in the Houston area who were unable to afford representation.

Mr. Fraser is a member of the Alternative Dispute Resolution Section of the American Bar Association (“ABA”). In 2021 and 2022, Mr. Fraser was recognized by Texas Super Lawyers as a Rising Star in Product Liability litigation.

Areas of Practice

- Complex Pharmaceutical and Medical Device Litigation
- Alternative Dispute Resolution

Education

- South Texas College of Law, Houston, Texas
 - Juris Doctorate – 2014

Honors and Awards

- Listed as a Super Lawyers Rising Star by Thomson Reuters’ Super Lawyers publication (2021 – 2023)

Speaking Engagements and Publications

- ABA Section of Dispute Resolution Spring Conference (2019) – The Competition Circuit: *Maximizing Learning Experience in Dispute Resolution Competitions*.
- Assess the Risk of Going to Trial in Your FCPA Prosecution (2016), *by Scott Fraser*.

ANDREA J. GIOVANNONE

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BIOGRAPHY

Andrea J. Giovannone is a Junior Partner with Rueb Stoller Daniel, LLP (“Rueb Stoller”) (formerly Dalimonte Rueb Stoller, LLP) and the managing attorney of their Los Angeles office. Ms. Giovannone is an attorney in good standing with State Bar of California since 2012, and is admitted to practice in the United States District Courts for the Central, Southern, Northern, and Eastern Districts of California. Ms. Giovannone has also been admitted *pro hac vice* in numerous state and federal courts around the country. Ms. Giovannone has been the lead attorney for the Rueb Stoller/Dalimonte Rueb hernia mesh docket since October 2017. Ms. Giovannone is currently managing thousands of hernia mesh claims, including a large number of cases which contain Covidien hernia mesh products. Her extensive work experience includes representing thousands of clients who have been injured by dangerous medical devices and pharmaceuticals in mass tort litigations, reviewing and coding thousands of documents, working with numerous experts, preparing many expert reports, drafting/preparing hundreds of briefs and motions, and participating in several mass tort trials.

Ms. Giovannone is currently a member of the Plaintiff Steering Committee in MDL No. 2846, *In Re: Davol, Inc./C.R. Bard, Inc., Polypropylene Hernia Mesh Products Liability Litigation* in the U.S. District Court in the Southern District of Ohio, and is Co-Chair of the Science and Expert Subcommittee as well as a member of the Law and Briefing Subcommittee. Ms. Giovannone is also a member of the Plaintiff Steering Committees in MCL No. 630, *In Re: Proceed Mesh Litigation (Proceed® Surgical Mesh and Proceed® Ventral Patch Hernia Mesh)* in the Superior Court of New Jersey Law Division - Atlantic County, and MCL No. 633, *In Re: Prolene Hernia System Mesh Litigation* in the Superior Court of New Jersey Law Division – Atlantic County.

Ms. Giovannone has taken and defended over 100 depositions in her career, including depositions of experts, prescribing physicians, implanting surgeons, explanting surgeons, primary care providers, medical directors, nurses and other medical professionals, and corporate witnesses. She has substantial experience assisting Discovery, Science, Expert, and Law/Briefing Committees in complex matters in MDLs and state court consolidations involving medical devices and pharmaceuticals, including *In Re: Davol, Inc./C.R. Bard, Inc., Polypropylene Hernia Mesh Products Liability Litigation* (MDL No. 2846), *In Re: Proceed Mesh Litigation (Proceed® Surgical Mesh and Proceed® Ventral Patch Hernia Mesh)* (MCL No. 630), *In Re: Prolene Hernia System Mesh Litigation* (MCL No. 633), *In re: Pradaxa (Dabigatran Etexilate) Products Liability Litigation* (MDL No. 2385), *In Re: Fresenius Granuflo/Naturalyte Dialysate Products Liability Litigation* (MDL No. 2428), and *In re: Consolidated Fresenius Cases*, Middlesex Superior Court (Middlesex Superior Court, CV2013-03400).

Ms. Giovannone managed the GranuFlo docket at Lopez McHugh, LLP, for years, including working up numerous plaintiff and defense bellwether cases, and actively participating as one of the lead trial attorneys in the first and only national bellwether trial in MA Superior Court before a global settlement was reached. Ms. Giovannone also did considerable work on the Bard IVC Filters docket prior

to the inception of the *In Re: Bard IVC Filters Product Liability Litigation* (MDL No. 2641), including work on the privilege log, document review, corporate depositions, and preparation for trial. Additionally, she has vigorously represented plaintiffs in individual personal injury cases in California. Ms. Giovannone is a member of the National Trial Lawyers Association (NTL) in both the Top 100 and Top 40 Under 40, the Association of Trial Lawyers of America (AAJ), the American Bar Association (ABA), the Los Angeles County Bar Association (LACBA), and the Italian American Lawyers Association (IALA), among others.

Mrs. Giovannone is backed by the national mass tort law firm Rueb Stoller Daniel, LLP, (formerly Dalimonte Rueb Stoller, LLP) with partners who have been involved in mass tort actions and multidistrict litigations across the country for over 25 years. Over the years, the managing partners at Rueb Stoller Daniel (formerly Dalimonte Rueb Stoller, LLP) have represented clients in numerous MDLs, including but not limited to, *In re: Oil Spill by the Oil Rig "Deepwater Horizon" in the Gulf of Mexico, on April 20, 2010* (MDL No. 2179); *In re: C. R. Bard, Inc., Pelvic Repair System Products Liability Litigation*, *In re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation*, and *In re: American Medical Systems, Inc., Pelvic Repair System Products Liability Litigation*; *In re: Bard IVC Filters Products Liability Litigation* (MDL No. 2641); *In re: Cook Medical, Inc., IVC Filters Marketing, Sales Practice and Products Liability Litigation* (MDL No. 2570); and *Dunson v. Cordis Corporation*. With combined experience of over sixty-five years, the attorneys of Rueb Stoller Daniel, LLP, (formerly Dalimonte Rueb Stoller, LLP) have represented tens of thousands of claimants across the country. Rueb Stoller and Ms. Giovannone have professional experience in multidistrict consolidated actions and mass tort litigation. Rueb Stoller and Ms. Giovannone further have extensive litigation, discovery and jury trial experience, and access to sufficient resources to advance the litigation in a timely manner, and are willing and able to commit the necessary resources to represent the plaintiffs filed in the Covidien MDL.

ADMISSIONS

- California Bar
- US District Court, Central District of California
- US District Court, Southern District of California
- US District Court, Northern District of California
- US District Court, Eastern District of California

EDUCATION

- **University of Texas School of Law**, Austin, Texas
 - Juris Doctorate, May 2012
 - Journal Editor: Texas Environmental Law Journal; Texas Review of Entertainment and Sports Law
- **University of California, Los Angeles**, Los Angeles, California
 - Bachelor of Arts and Humanities in Philosophy, May 2008
 - Minor in Political Science

WALTER KELLEY

BERNHEIM KELLEY, LLC

I, WALTER KELLEY, in support of my application to serve as Plaintiffs' Liaison Counsel in Multidistrict Litigation No. 3029 - In Re: Covidien Hernia Mesh Products Liability Litigation, respectfully submit the following:

INTRODUCTION

1. I am an experienced trial attorney admitted to practice law in the Commonwealth of Massachusetts and in good standing with the Board of Bar Overseers.
2. I am a partner at Bernheim Kelley, LLC, a law firm focused primarily on representing Plaintiffs in complex consumer, pharmaceutical and medical products liability litigation.
3. I have an exceptional amount of experience as a trial attorney prosecuting products liability and wrongful death claims on behalf of plaintiffs both nationally and locally in the federal and state courts of Massachusetts.

RELEVANT PROFESSIONAL EXPERIENCE

On May 16, 2022, I was scheduled to be lead trial counsel in a pharmaceutical products liability case before the Honorable Nathaniel M. Gorton. We alleged our client experienced uncontrollable sexual, gambling and eating behaviors as a result of ingesting the prescription drug, Abilify. After many years of protracted litigation and failed mediations, this case had been remanded to the District Court of Massachusetts for trial from MDL 2734 - In re: Abilify (Aripiprazole) Products Liability Litigation. On April 7, 2022, just weeks before we started trial, we successfully resolved this matter at mediation with the help of Chief Magistrate Judge M. Page Kelley.

I have also served in numerous consolidated pharmaceutical, consumer product and medical device litigations for the common benefit of many claimants.

- I have recently been lead trial counsel in three (3) wrongful death jury trials involving products liability claims against Philip Morris and R.J Reynolds tobacco companies in the Massachusetts Superior Courts. I currently lead a consortium of law firms prosecuting additional cases that have been consolidated before the Honorable Rosemary Connolly in the Business Litigation Session of the Suffolk Superior Court. Most of our clients are victims of lung cancer after many years of heavy cigarette smoking due to nicotine addiction. I am Chairperson of the Discovery Committee and Expert/Science Committee in this consolidated litigation.
- I was appointed to serve as co-lead counsel by the Honorable Indira Talwani in MDL No. 2768 – *In Re Stryker LFIT V40 Femoral Head Products Liability Litigation*. As co-lead counsel responsible for over 1,200 claimants alleging the Defendants failed to adequately design and test their

device to ensure that it would not corrode, erode, deteriorate, fracture (disassociate) and induce severe metal ion poisoning in patients, I oversaw almost every aspect of this litigation and resulting settlements.

- I was appointed to serve as a co-lead counsel by the Honorable Maynard Kirpilani in the *In Re: Consolidated Fresenius Dialysis Products Liability Litigation (MICV-2013-05050-C)*. As co-lead counsel responsible for over 8,000 claimants, I worked collaboratively with a team of attorneys in both state and federal court (MDL 2428 before the Honorable Douglas P. Woodlock) to oversee what turned out to be one of the most complex mass tort litigations in recent history.

My responsibilities included working directly on almost every aspect of this very complex litigation, including the common benefit time and billing systems; document review procedures and platforms; e-discovery guidelines; bellwether guidelines and schedules; discovery strategy and coordination; trial preparation; privilege log disputes; conducting focus groups; drafting and arguing motions before the Court; developing experts and negotiating a global settlement agreement.

I am very proud of the work product we ultimately produced in this litigation, which has been described by many prolific trial attorneys as one of the best overall trial packages they have ever received. The collaboration and coordination between the state and federal litigations was remarkable and is a testament to the multitude of efficiencies gained by different litigation venues working cooperatively on pre-trial matters.

- I was appointed to serve on the Plaintiffs' Executive Committee (PEC) by the Honorable Dennis F. Saylor, IV in MDL No. 2657 – *In Re Zofran (Ondansetron) Products Liability Litigation*. The MDL was consolidated before Judge Saylor in Boston – USDC, District of Massachusetts. My firm represents families across the country against GlaxoSmithKline (GSK) related to their blockbuster anti-nausea drug Zofran and congenital birth defects alleged to have been caused by their fraudulent misrepresentations to prescribing physicians about the safety profile of this drug for pregnant women. My law firm served on the Bellwether Committee, Law and Briefing Committee and Discovery Committee in this MDL.
- My firm has been a national leader in defective hip implant litigations over the past fifteen years. We continue to litigate and resolve defective hip cases across the Country against Johnson & Johnson, Zimmer Biomet, Omnilife Science, Wright Medical and Stryker. Many of the hip litigations we are handling do not involve recalled products or consolidated litigation. We have retained and developed a stable of world-class experts who support us in these cases. I personally oversee virtually every aspect of these litigations and settlements.

CONCLUSION

My professional experience leading consolidated products liability litigations in the District Court of Massachusetts and the Massachusetts Superior Courts, would make me an excellent candidate to serve as Plaintiffs' Liaison Counsel for this MDL. I have consistently endeavored to give my best efforts and full commitment to every mass tort I have been entrusted with leading and I pledge to continue to do so on behalf of all Plaintiffs in this MDL.

Respectfully.



Walter Kelley, Esquire
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Robert King Biography

Robert King was born and raised in rural upstate New York. He graduated summa cum laude from St. John Fisher University with a B.A. in history and thereafter graduated from Syracuse University College of Law in 2007. Mr. King began his career as a member of the Monroe County District Attorney’s Office in Rochester, New York. He was promoted to Senior Trial Attorney in the Special Victim’s Unit where he was responsible for prosecuting the most heinous and sensitive crimes – those involving physical and sexual violence against women and children.

Mr. King entered private practice at age twenty-nine. He became the founding partner of The Law Office of Robert King PLLC (“King Law”) with its principal office located in Rochester, New York. King Law focuses its work on civil litigation specializing in Plaintiff’s catastrophic injuries, defective/dangerous products and complex litigation. The firm has consistently grown since opening in 2012 and now includes three (3) offices in upstate New York. Mr. King is licensed to practice in New York, Iowa and is pending admission in North Carolina. He has received various recognitions including Top 40 under 40, Superlawyer, and was named a “Best Law Firm in Rochester, New York” by the Rochester Business Journal in 2020. Mr. King is active in the legal community including speaking at CLE’s and mentoring young attorneys. The community involvement he is most proud of is writing and implementing curriculum to teach law classes to rural high school students in upstate New York.

Upstate New York does not have a “traditional” mass tort firm. Over the past several years the firm has seen an increase in interest of clients seeking representation involving mass torts.

LAW OFFICE OF ROBERT KING, PLLC

Robert King, Esq. | Gregory Colavecchia, Esq. | Anna Robbins, Esq. | Jeremiah King, Esq.

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Syracuse, NY 13202
315.544.5538



Due to this, King Law has spent significant time investigating the feasibility of local representation for the victims of various mass torts in upstate New York. King Law is currently handling and investigating various mass torts including cases in the AFFF, PFOS litigation(s), Camp Lejeune litigation, Medical Device litigations and now Covidien Mesh litigation.

Mr. King has extensive experience in federal courts in both the criminal and civil setting. Mr. King's civil experience includes cases against corporate defendants such as Travel Centers of America, Dollar General, Troon Golf, Wegmans Supermarkets, Swift Trucking Company, D.A. Collins Construction Company, amongst many others. He has also successfully litigated civil cases against the University of Rochester, The State University of New York, The City of Rochester, New York and the City of Binghamton, New York. He has tried over 100 criminal and civil cases to verdict.

Mr. King's background and experience has given him the deepest appreciation for lawyers that communicate and work cooperatively – with similarly interested counsel, opposing counsel and the Court. If appointed, he will work diligently on behalf of clients, as part of the Committee and in a manner that is respectful of the profession and the Court.

TIMOTHY M. O'BRIEN
LEVIN, PAPANTONIO, RAFFERTY,
PROCTOR, BUCHANAN, O'BRIEN,
BARR & MOUGEY, P.A.

Timothy O'Brien received his B.A. with High Distinction from the University of Virginia in 1992. After graduating with Honors from the University of Florida Fredric G. Levin College of Law with Honors in 1995, Mr. O'Brien worked for two years as a law clerk for the Honorable William T. Moore, Jr., United States District Judge for the Southern District of Georgia. Mr. O'Brien then entered private practice at Oliver Maner & Gray, LLP, in Savannah, Georgia where he concentrated his practice in the area of federal civil litigation. In 2000, Mr. O'Brien was recruited by and joined the law firm of what is now known as Levin, Papantonio, Rafferty, Proctor, Buchanan, O'Brien, Barr & Mougey, P.A. ("Levin · Papantonio · Rafferty"), of which he now is an equity senior Shareholder.

Mr. O'Brien is a board-certified civil trial attorney who concentrates his practice in the areas of product liability, personal injury, wrongful death, business torts and mass tort litigation. Mr. O'Brien is rated "A-V Preeminent" by the prestigious Martindale-Hubbell lawyer peer-rating service. Mr. O'Brien currently is serving as Co-Lead Counsel for the Plaintiffs Steering Committee in *In re Bard/Davol Polypropylene Hernia Mesh Products Liability Litigation*, MDL No. 2846 (S.D. Ohio). In 2020, District Judge Brian Martinotti appointed Mr. O'Brien to serve as the Discovery Chair for the Plaintiffs Executive Committee in *In re Elmiron (Pentosan Polysulfate Sodium) Products Liability Litigation*, MDL No. 2973. Mr. O'Brien previously served as a member of the Plaintiffs' Executive Committee in *In re Invokana (Canagliflozin) Products Liability Litigation*, MDL No. 2750 (D.N.J.), where he oversaw the master discovery and as Lead Counsel for the Plaintiffs Steering Committee *In re: Fosamax Products Liability Litigation*, MDL No. 1789

(S.D.N.Y.) In 2016 and 2017, he served as bellwether trial co-counsel for the first two trial plaintiffs in *In re: E.I. DuPont de Nemours and Co. C-8 Personal Injury Litigation*, MDL No. MDL No. 2433, and was lead trial counsel for the fourth and last bellwether trial case in that MDL during which the MDL's \$670 million settlement was secured shortly before closing arguments.

Previously, Mr. O'Brien served as Discovery Co-Chair of the Plaintiffs Steering Committee in *In re: Yasmin and Yaz (Drospirenone) Products Liability Litigation*, MDL No. 2100 (S.D. Ill.), as Plaintiffs' Co-Lead Counsel in *In re: Cisco Systems Securities Litigation*, MDL No. 1527 (N.D. Cal.), as Discovery Co-Chair in *In re: Accutane Products Liability Litigation*, MDL No. 1626 (M.D. Fla.), as Discovery Co-Chair in *In re: Medtronic, Inc., Implantable Defibrillators Product Liability Litigation*, MDL No. 1726 (D. Minn.), as a member of the Plaintiffs Steering Committee in *In re: Guidant Corp. Implantable Defibrillators Product Liability Litigation*, MDL No. 1708 (D. Minn.), and served on the discovery committee of *In re: Phenylpropanolamine ("PPA") Products Liability Litigation*, MDL No. 1407 (W.D. Wash.)

Mr. O'Brien's law firm was founded in 1955, and began focusing in mass torts plaintiffs' personal injury law in the late 1980s. Since that time, Levin · Papantonio · Rafferty has earned a reputation as one of the most successful personal injury law firms in the nation, accumulating jury verdicts and settlements exceeding \$5 billion. The firm owns the national seminar company, Mass Torts Made Perfect, which hosts two major conferences each year averaging more than 750 attendees per conference. The firm currently employs more than 40 attorneys and more than 100 non-attorney staff. Rated A-V® by Martindale-Hubbell for more than fifteen years, Mr. O'Brien personally has tried more than 60 civil jury trials to verdict and received his Board Certification as a Civil Trial Specialist by the Florida Bar in 2010.

Kelsey L. STOKES
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BIOGRAPHY

Kelsey L. Stokes is a mass tort attorney with the national law firm Fleming, Nolen & Jez, LLP (FNJ), who has done extensive work representing thousands of clients injured by dangerous pharmaceuticals and medical devices.

In September 2018, Ms. Stokes was appointed by the United States Southern District of Ohio as Co-Lead Counsel for the Plaintiffs' Steering Committee in MDL No. 2846, *In re Davol, Inc./C.R. Bard, Inc., Polypropylene Hernia Mesh Products Liability Litigation*. Ms. Stokes also serves on the Plaintiffs' Steering Committee of MDL 2753, *In re: Atrium Medical Corp. C-QUR Mesh Products Liability Litigation*. In addition to her leadership roles at the federal level, Ms. Stokes was appointed to the Plaintiffs' Executive Committee in three New Jersey state court consolidated actions against Johnson & Johnson and Ethicon, Inc.: MCL 627, *In re: Physiomesher Litigation*; MCL 630, *In re: Proceed Mesh Litigation*; and MCL 633, *In re: Prolene Hernia System Mesh Litigation*. Ms. Stokes was also elected Co-Chair of the American Association for Justice Hernia Mesh Litigation Group by her peers.

Recognized as a national leader in hernia mesh litigation, Ms. Stokes spends countless hours guiding fellow plaintiffs' lawyers across the country on case evaluation and filing strategy in multiple jurisdictions.

Prior to leading the hernia mesh docket, Ms. Stokes played an integral role litigating FNJ's transvaginal mesh docket to a successful resolution. Her work in the various transvaginal

mesh MDLs gave her a wealth of knowledge overlapping with the knowledge required to successfully litigate hernia mesh cases.

Ms. Stokes has regular speaking engagements, sharing the knowledge she has gained studying the science and legal issues applicable to mesh litigation with other national mass tort lawyers.

Litigating throughout the country, Ms. Stokes has taken hundreds of depositions, including depositions of corporate witnesses, expert witnesses, and treating physicians. Ms. Stokes has also defended the leading experts in their fields as well as hundreds of plaintiffs injured by various medical devices and pharmaceutical drugs. She regularly argues at hearings throughout the country and coordinates large-scale briefing on behalf of the MDL and FNJ's clients, including at the appellate level. Most recently, Ms. Stokes tried the first two Bellwether cases in the Bard Hernia Mesh MDL and is serving as co-chair of the Settlement Negotiation Committee for that MDL.

Ms. Stokes also managed the firm's GranuFlo docket from case filing to resolution, successfully navigating clients through the settlement claims process. In addition to the above litigations, Ms. Stokes performed considerable work on the Wright Hip and Accutane Litigations as well as Testosterone Replacement Therapy (TRT), in which she was trial counsel in the first TRT trial in Cook County, Illinois.

Ms. Stokes's practice also includes complex commercial litigation in federal and state court, and arbitration, resulting in multimillion-dollar settlements and verdicts. Examples include arbitrations where she represented health-care providers in contractual and payment disputes with insurers; a massive Ponzi scheme; and an off-shore commercial oil dispute. Ms. Stokes's experience also extends to catastrophic aviation accidents.

Ms. Stokes is backed by the national law firm FNJ, whose lawyers have been involved in mass actions and multidistrict litigation since the 1970's (*In Re 1971 Alaska Airlines Disaster*). Over the years, FNJ has represented clients in numerous MDLs, including, Hormone Replacement Therapy Litigation, Fen-phen Diet Drug Litigation, Rezulin Diabetes Drug Litigation, Ortho Evra Patch Litigation, Hydroxycut Diet Supplement Litigation, Asbestos Litigation, Ford Rollover Litigation, Firestone Tire Litigation, General Motors Rollover Litigation, Transvaginal Mesh Litigation, Sulzer Hip Litigation, Depuy ASR Litigation, Biomet Litigation, and the Stryker Hip Litigation. In addition to Ms. Stokes's leadership positions, FNJ currently has attorneys serving on the PSC for the Taxotere MDL, Valsartan MDL, the Zimmer NexGen MDL, the Wright Hip JCCP, and the Essure JCCP.

FNJ and Ms. Stokes are willing, able, and ready to commit the necessary resources to pursue the Defendants in this MDL.

ADMISSIONS

- Texas Bar
- US District Courts for the Southern, Northern, Eastern, and Western Districts of Texas
- US Courts of Appeals for the Third, Fourth, and Sixth Circuits

EDUCATION

- **University of Houston Law Center**, Houston, Texas
 - Juris Doctor, May 2012
 - Chief Managing Editor, Journal of Consumer and Commercial Law
- **University of Texas**, Austin, Texas
 - Bachelor of Science in Mathematics (Actuarial Science), May 2006
 - Bachelor of Arts in Economics, May 2005

C. Brett Vaughn

C. Brett Vaughn is one of the founding partners in the law firm Nigh Goldenberg Raso & Vaughn, located in D.C., Florida, Minnesota, and Kansas. Mr. Vaughn also maintains his license as a Registered Nurse. Mr. Vaughn focuses on representing individuals who have been harmed by dangerous pharmaceuticals or medical devices, particularly mass tort product liability claims. Mr. Vaughn has served on the Plaintiffs' Executive Committee and as co-chair of the science and expert committee on the following litigations: *In Re: Davol, Inc./C.R. Bard, Inc., Polypropylene Hernia Mesh Products Liability Litigation* (MDL 2846), *Proceed Surgical Mesh and Proceed Ventral Patch New Jersey Multicounty Litigation* (MCL 630), *Prolene Hernia System New Jersey Multicounty Litigation* (MCL 633), *Physiomesb Flexible Composite Mesh New Jersey Multicounty Litigation* (MCL 627), and *In Re: Valsartan N-Nitrosodimethylamine (NDMA) Contamination Products Liability Litigation* (MDL 2875).

Mr. Vaughn has extensive experience working with cancer researchers and developing theories of liability related to various carcinogens through his leadership position on the valsartan litigation. Through valsartan and multiple other litigations, Mr. Vaughn has worked closely with Dr. Dipak Panigrahy, who led angiogenesis and cancer animal modeling in the Judah Folkman laboratory and has received substantial grants funded by the National Institutes of Health (NIH) and the National Cancer Institute (NCI) to study cancer and metastasis. Dr. Panigrahy is one of the premier cancer researchers in the world. Mr. Vaughn has also worked closely with epidemiologists, toxicologists, and risk assessors concerning various carcinogens. Through the hernia mesh litigations, Mr. Vaughn has worked closely with many world-renowned surgeons, biomedical engineers, polymer scientists, and regulatory experts, including the former head of the FDA Dr. David Kessler.

Mr. Vaughn received his nursing degree from Missouri Southern State University and his J.D. from the University of Missouri-Kansas City School of Law.