UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: COVIDIEN HERNIA MESH PRODUCTS LIABILITY LITIGATION NO. II,	
This Document Relates To:	**MDL No. 1:22-md-03029-PBS**
All Cases	

PLAINTIFFS' SELECTION OF SUBSTITUTE BELLWETHER DISCOVERY
PLAINTIFF AND JOINT PROPOSED SCHEDULE
GOVERNING SUBSTITUTE SELECTION

Pursuant to the discussion with the Court at the 12/19/23 Case Management Conference,

the PSC selects the following case as a substitute for Leslie Covington, 1:22-cv-10104:

- Claudia G. Juanz, 1:21-cv-12020

The Parties conferred and propose the following joint schedule governing the substitute

Bellwether Discovery Plaintiff:

Date	Event
February 2, 2024	Plaintiff shall serve a completed Plaintiff Fact Sheet ("PFS").
March 18, 2024	Defendants will serve a Defendant Fact Sheet ("DFS").
June 7, 2024	Completion of all case-specific fact discovery, which may include up to five fact depositions taken by each party in interest in each case.

1

Dated: January 3, 2024

Respectfully submitted,

/s/ Kelsey L. Stokes
Kelsey L. Stokes
Plaintiffs' Co-Lead Counsel
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

Timothy M. O'Brien
Plaintiffs' Co-Lead Counsel
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

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

Attorneys for Plaintiffs

2

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on this 3rd day of January 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of this electronic filing to all counsel of record.

/s/ *Kelsey Stokes*
Plaintiffs' Co-Lead Counsel