

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GLUCAGON-LIKE)
PEPTIDE-1 RECEPTOR AGONISTS) Case No. 24-md-03094-GEKP
(GLP-1 RAS) PRODUCTS)
LIABILITY LITIGATION)
)
)
)
)
)
)
)

**MOTION FOR
APPOINTMENT OF PLAINTIFF LEADERSHIP**

Parvin K. Aminolroaya
SEEGER WEISS LLP
55 Challenger Rd., 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
Email: paminolroaya@seegerweiss.com

Jonathan Orent
MOTLEY RICE LLC
40 Westminster St., 5th Floor
Providence, RI 02903
Telephone: (401) 457-7700
Email: jorent@motleyrice.com

Paul Pennock
MORGAN & MORGAN
350 Fifth Avenue, Suite 6705
New York, NY 10118
Telephone: (212) 738-6299
Email: ppennock@forthepeople.com

Sarah Ruane
WAGSTAFF & CARTMELL
4740 Grand Avenue Suite 300
Kansas City, MO 64112
Telephone: (816) 701-1123
Email: sruane@wcllp.com

Proposed Co-Lead Counsel

TABLE OF CONTENTS

| | | |
|------|---|----|
| I. | INTRODUCTION | 3 |
| II. | BACKGROUND | 4 |
| III. | ARGUMENT | 6 |
| | A. Criteria Considered in Leadership Appointments..... | 6 |
| | B. The Proposed Co-Lead Counsel Have Demonstrated a Willingness and Availability to Commit to a Time-Consuming Project..... | 7 |
| | C. Each Proposed Co-Lead Counsel Has a History of Working Cooperatively with Other Counsel in These Proceedings | 9 |
| | D. Each Proposed Co-Lead Counsel Has Extensive Experience in This Type of Litigation..... | 10 |
| | 1. Parvin Aminolroaya, Seeger Weiss LLP | 11 |
| | 2. Sarah Ruane, Wagstaff & Cartmell LLP | 12 |
| | 3. Jonathan Orent, Motley Rice LLC..... | 12 |
| | 4. Paul Pennock, Morgan & Morgan P.A. | 13 |
| | E. Each Proposed Co-Lead Counsel Has Access to Sufficient Resources to Prosecute the Litigation in a Timely Manner | 15 |
| IV. | CONCLUSION..... | 15 |

I. INTRODUCTION

Counsel in the vast majority of complaints on file have reached agreement on a proposed leadership structure for the cases consolidated into *In Re Glucagon-like Peptide-1 Receptor Agonists Products Liability Litigation*, MDL No. 3094 (the “GLP-1 MDL”).¹ The proposed structure consists of four proposed Co-Lead Counsel: (i) Parvin Aminolroaya of Seeger Weiss, LLP; (ii) Sarah Ruane of Wagstaff & Cartmell, LLP; (iii) Jonathan D. Orent of Motley Rice, LLC; and (iv) Paul Pennock of Morgan & Morgan, P.A.; two proposed Liaison Counsel: (i) Roberta Liebenberg of Fine Kaplan and Black, R.P.C.; and (ii) Nina Spizer of Dilworth Paxson LLP; as well as a Plaintiffs’ Executive Committee (“PEC”) and Plaintiffs’ Steering Committee (“PSC”), to account for the interests of all stakeholders, appropriately distribute resources, and maintain open lines of communication.

In the months leading up to the initial conference before this Court, counsel conferred and, through extensive negotiations, agreed to bring together formerly competing counsel to form a strong and cohesive group that will work cooperatively and efficiently to best represent the interests of the injured plaintiffs in this litigation. The proposed Co-Lead Counsel also have been mindful of the factors the Court considered in establishing leadership structures in other litigations. *See In re Imprelis Herbicide Mktg., Sales Practices & Prods. Liab. Litig.*, No. 11-md-2284-GEKP, Dkt. 55 (E.D. Pa. Jan. 11, 2012) (“*Imprelis*”) (appointing four Co-Lead Counsel); *In re Processed Egg Products Antitrust Litig.*, No. 08-md-02002-GEKP, Dkt. 3 & 20 (E.D. Pa.) (“*Eggs Antitrust*”) (appointing four Co-Lead Counsel for Direct Purchaser class and four Co-Lead Counsel for Indirect Purchaser class); *In re Wawa Inc. Data Security Litigation*, No. 2:19-cv-06019, Dkt. 120 (E.D. Pa. June 12,

¹ As of the time of this filing, the Proposed Co-Leads have confirmed active support from counsel in 68 of the 76 complaints on file.

2020) (“*Wawa*”) (appointing four Interim Co-Lead Class Counsel for proposed Consumer Plaintiff class and three Co-Lead Counsel for Financial Institution Plaintiff class). The Proposed Co-Leads submit this proposed leadership structure in connection with the Court’s request at the March 14, 2024, initial conference.

The proposed Co-Lead Counsel will closely coordinate with one another and other plaintiffs’ counsel to avoid any potential duplication of effort, and to ensure accountability. In order to effectively leverage contributions from firms beyond the four co-leads, including thought leadership, litigation resources, and attorney time, proposed Co-Lead Counsel believe it is appropriate to appoint both a PEC and PSC to assist in the litigation of these cases, as discussed in more detail below.²

Proposed Co-Lead Counsel have already undertaken significant efforts to advance this litigation over the past seven months, and readily satisfy all potentially applicable criteria for appointment to lead this litigation.

II. BACKGROUND

As of March 21, 2024, 76 complaints have been filed in or transferred to this docket, by dozens of law firms representing injured users of GLP-1 RAs manufactured and sold by Eli Lilly and Novo Nordisk entities.

All proposed Co-Lead Counsel initially filed separate actions on behalf of individuals injured by GLP-1 RAs and had advocated for a variety of proposed transferee courts before the Judicial Panel on Multidistrict Litigation (“JPML”). Subsequent to the JPML’s order transferring these matters to this Court, and mindful of this Court’s observation on “how

² The Proposed PEC and Proposed PSC are described in the chart attached hereto as Exhibit A. Proposed Co-Lead Counsel are also happy to include plaintiffs’ counsel beyond these committees to the extent that other counsel is willing and able to contribute efficiently and productively to advancing this litigation.

unattractive it is for lawyers to be squabbling with each other,” (3/14/24 Ct. Conf. Tr. at 15:8-15:9) counsel sought consensus regarding leadership, and were subsequently able to reach agreement with a wide variety of Plaintiff’s firms to combine efforts in the spirit of cooperation to form the joint proposed Plaintiff Leadership structure described herein.

Pursuant to the Court’s guidance, proposed Co-Lead Counsel solicited applications from over 100 Plaintiffs’ attorneys for membership on the PEC and PSC, including all counsel who attended the March 14, 2024 conference, as well as other firms whose cases have not yet been transferred to this MDL. Proposed Co-Leads sought information from applicants on their professional experience in mass torts, their other appointments that might take time away from this MDL, the areas in which they were interested in assisting, and the work they had done to date to develop the GLP-1 litigation. Proposed Co-Leads received a significant number of applications and met in person to review candidates’ curriculum vitae and discuss the experience, qualifications, and capabilities of each candidate, while seeking to strike the right balance between keeping groups at a workable size on the one hand and recognizing the tremendous outpouring of support on the other.³ The resulting Proposed PEC and Proposed PSC are comprised of the most well-qualified applicants, and reflect significant diversity of geography, experience, and perspectives.⁴ The Proposed PEC and Proposed PSC also include a number of firms with whom proposed Co-Lead Counsel have not previously collaborated, in order to be inclusive of the wide field of talent interested in

³ To the extent contributions from non-committee members are needed to efficiently advance this litigation, proposed Co-Leads will reach out to non-committee members who showed interest during the application process.

⁴ Proposed Co-Leads also sought to strike the balance the Court described in terms of mentorship, giving younger lawyers opportunity for development without sacrificing quality by selecting a small group of junior attorneys for an informal Leadership Development Committee. March 14, 2024, CMC Tr. at 13:8-12 (“But I do hope that as part of the process there will be consideration for generations of lawyers in the future for the benefit of learning from you all who are experienced.”).

participating in this litigation. This structure will enable leadership efficiently to assign counsel to discrete tasks based on their experience, expertise, and availability. In addition to serving as a conduit for information to flow between individual counsel and the Court and defendants, the highly capable Plaintiffs' counsel on the PEC and PSC will be asked to assist on an as-needed basis on certain pre-defined tasks during the litigation.

The proposed Co-Lead Counsel are comprised of experienced and highly accomplished counsel who have decades of experience handling multi-district litigations, including pharmaceutical and failure-to-warn cases, and have a proven track record of success and the ability to work efficiently and cooperatively with one another. In addition, each of the proposed Co-Lead Counsel has the time and resources necessary to litigate this case vigorously on behalf of Plaintiffs.

III. ARGUMENT

A. Criteria Considered in Leadership Appointments

The Manual for Complex Litigation directs judges to select “qualified and responsible” lead and liaison counsel who “will fairly and adequately represent all of the parties on their side, and [whose] charges will be reasonable.” 10.22. *Coordination in Multiparty Litigation—Lead/Liaison Counsel and Committees*, Ann. Manual Complex Lit. (“MCL”) § 10.22 (4th ed.). The MCL sets forth the following factors for the Court’s evaluation of proposed leadership:

- (1) qualifications, functions, organization, and compensation of designated counsel;
- (2) whether there has been full disclosure of all agreements and understandings among counsel;
- (3) would-be designated attorneys’ competence for assignments;

(4) whether there are clear and satisfactory guidelines for compensation and reimbursement, and whether the arrangements for coordination among counsel are fair, reasonable, and efficient;

(5) whether designated counsel fairly represents the various interests in the litigation;

(6) attorneys' resources, commitment, and qualifications to accomplish the assigned tasks; and

(7) attorneys' ability to command the respect of their colleagues and work cooperatively with opposing counsel and the court.

10.224. *Court's Responsibilities*, MCL § 10.224 (4th ed.)

Consistent with these factors, in the context of prior leadership appointments, this Court has identified “willingness and availability to commit to a time-consuming project, ability to work cooperatively with others, professional experience in this type of litigation, and access to sufficient resources to prosecute the litigation in a timely manner” as the main criteria to be considered. *In re Wawa*, Dkt. 62 at 2. As discussed at the March 14, 2024 hearing, the leadership slate proposed herein is the product of private discussions among plaintiffs' counsel, in accordance with the Third Circuit Task Force Report Selection of Class Counsel, 208 F.R.D. 340, 416 (2002), which found that “[c]ase law and experience indicates that the dominant scenario for appointing class counsel is deference to private ordering.” *See also id.* (“[t]he Task Force believes there is generally no reason to hold an auction when the court is presented with qualified counsel who has been chosen through private ordering.”).

B. The Proposed Co-Lead Counsel Have Demonstrated a Willingness and Availability to Commit to a Time-Consuming Project

The work already conducted by the proposed Co-Lead Counsel demonstrates their willingness and availability to commit to a time-consuming project. They performed many

substantive tasks that will allow them to continue to advance this litigation on behalf of Plaintiffs once leadership appointments are made. To date, in preparing this litigation over the past year, they have collectively:

- Worked to foster coordination among Plaintiffs' counsel, including dozens of telephonic and video conferences with counsel around the country who are interested in assisting with the prosecution of this large-scale litigation;
- Conferenced with Plaintiffs' counsel who may pursue state court litigation;
- Successfully defended motions to dismiss on numerous grounds;
- Researched and developed the science involving GLP-1 RA induced gastroparesis, ileus (blocked intestine), pulmonary aspiration and related injuries;
- Conducted initial meetings with, and in some cases retained, experts in a variety of relevant fields;
- Analyzed adverse event reports relating to Defendants' knowledge of injuries;
- Marshalled facts regarding Novo Nordisk's marketing plan to sell its GLP-1 RA drugs, including its development of organizations to facilitate sales of the drug, as well as Eli Lilly's marketing approach;
- Drafted and conducted extensive negotiations of proposed orders governing ESI, privilege, preservation and confidentiality;
- Established a central repository for documents received by FOIA request and for medical literature collected by this group;
- Chaired and spoke at legal conferences to educate hundreds of counsel on the issues involved;
- Drafting of a protocol to track and limit time and expenses, to ensure efficient use of resources in this litigation;

- Served preservation letters to defendants;
- Commenced negotiations with experienced vendors, with whom the Proposed Co-Leads have extensive history, including vendors involved in large, complex litigations such as *In re 3M Combat Arms Earplugs Prods. Liab. Litig.*, MDL No. 2885, and *In re National Prescription Opiate Litig.*, MDL No. 2804. Proposed Co-Leads are presently awaiting final bids from these litigation vendors, and in accordance with the Court's guidance⁵ will not use any new or untested vendors in this litigation.

Since August 2023, collectively, Proposed Co-Leads have participated in approximately 20 meet-and-confers with the defendants on the items discussed above.

Each proposed Co-Lead Counsel is committed to devoting substantial resources to vigorously litigate this case, just as they have done in countless other MDLs that they have successfully brought to resolution. Also, each Co-Lead Counsel and/or their respective law firm have jury trial experience in the complex litigation context, demonstrating their proven willingness and ability to commit to a time-consuming process.

C. Each Proposed Co-Lead Counsel Has a History of Working Cooperatively with Other Counsel in These Proceedings

Each proposed Co-Lead Counsel has a long history of working cooperatively with others, including with each other and with many other counsel in these proceedings. Ms. Aminolroaya and Mr. Pennock served as co-lead counsel together in *In re Elmiron Prods. Liab. Litig.*, MDL No. 2973, and Mr. Pennock and Ms. Aminolroaya's firm have worked together for decades, including in *In re Proton Pump Inhibitor Prods. Liab. Litig.*, MDL No. 2789, which resulted in a \$425 million settlement. Motley Rice and Wagstaff & Cartmell also collaborated on *Pelvic Mesh*,

⁵ March 14, 2024, CMC Tr. at 24:2-12.

MDL No. 2326, and Motley Rice and Seeger Weiss worked together on experts and the *Daubert* drafting team in *In re National Prescription Opiate Litig.*, MDL No. 2804. All four Proposed Co-Lead firms have worked together in *In re Social Media*, MDL No. 3047.

In addition to a history of collaboration with one another, proposed Co-Lead Counsel and their firms also have a history of successful cooperation with other counsel in this litigation. For example, Seeger Weiss collaborates with Levin Papantonio in the ongoing *In re Allergan Biocell Prods. Liab. Litig.*, MDL No. 2921, and the two firms worked together on bellwether trials in *In re Testosterone Replacement Therapy Prods. Liab. Litig.*, MDL No. 2545. Levin Papantonio, Aylstock Witkin Kreis & Overholtz, the Gori Law Firm, and Goza & Honnold also worked with all four Proposed Co-Lead firms on *In re 3M*, MDL No. 2885, which resulted in an approximately \$6 billion settlement. There are also numerous cases in which the proposed Co-Lead Counsel or their firms worked cooperatively as co-counsel with other counsel who filed cases on behalf of individual Plaintiffs in these proceedings. Proposed Co-Lead Counsel have also had repeated cooperative contact with Defense counsel in this case, engaging in approximately twenty calls, videoconferences, and in-person meetings with counsel for Lilly and Novo to discuss case management issues, coordinating presentations for the initial conference, and negotiating orders governing confidentiality and document discovery.

Just as they have done in the past, each proposed Co-Lead Counsel is committed to working cooperatively with each other and all other counsel in this matter.

D. Each Proposed Co-Lead Counsel Has Extensive Experience in This Type of Litigation

Experience in pharmaceutical and failure-to-warn litigation is an important leadership factor in cases such as this, which present technical issues of fact and law that are constantly evolving. For example, this case will require – to name just a few issues – an understanding of the science relating to GLP-1 RAs, gastroparesis, ileus, and the other injuries at issue in

these cases; the FDA approval process, and the FDA process for changing pharmaceutical labels; and the individual actions. Thus, appointing a leadership team experienced in other large-scale pharmaceutical litigation is critical and in the best interest of all Plaintiffs. Below are high-level summaries of the Proposed Co-Lead's relevant experience:

1. Parvin Aminolroaya, Seeger Weiss LLP

Parvin Aminolroaya is a partner in the New Jersey office of Seeger Weiss LLP. Ms. Aminolroaya has extensive experience with large scale, mass tort litigation where bellwether trials are expected. In these MDL litigations, Ms. Aminolroaya has served as co-lead counsel or led or co-led the development of key regulatory and scientific experts (including in the national Opioids litigation and the federal Hernia Mesh MDL litigation, among others). She has also been a member of four bellwether trial teams where over \$400 million in initial verdicts were obtained for bellwether plaintiffs.

Ms. Aminolroaya was appointed co-lead counsel of the *In re Elmiron Products Liability Litigation*, MDL No. 2973, involving allegations that the drug Elmiron caused pigmentary maculopathy (a permanent vision injury which leads to significant vision limitations). Along with her co-lead counsel, Mr. Pennock, she developed crucial strategies for the litigation's failure to warn and causation experts. In addition, she handled key corporate depositions and led the defense to *Daubert* challenges to the plaintiff's experts in the first bellwether case. The litigation is now in the resolution phase.

Ms. Aminolroaya also worked on the development of key general causation and damages experts who testified in multiple bellwether trials in the *In re 3M Combat Arms Products Liability Litigation*, and co-led the development of a key regulatory expert in *In re Nat'l Prescription Opiate Litig.*, where she also drafted multiple *Daubert* opposition briefs. Ms. Aminolroaya also co-led the development of the key regulatory expert in *In re Davol*,

Inc./C.R. Bard, Inc. and was a member of the trial teams for the first three bellwether cases in *In re TRT* resulting in \$290 million in initial verdicts.

2. Sarah Ruane, Wagstaff & Cartmell LLP

Sarah Ruane is a partner and Chair of the Litigation Management Committee at the Kansas City-based Wagstaff & Cartmell LLP. Ms. Ruane has served as trial counsel, including lead counsel, in 10 jury trials in federal and state court, nearly all of which were cases involving drugs, medical devices, and health care services.

Ms. Ruane worked extensively on trials and in discovery over the past decade in the national Pelvic Mesh Repair System Products Liability Litigation, which included *In Re: C.R. Bard, Inc.*, MDL No. 2187; *In Re: American Medical Systems, Inc.*, MDL No. 2325; *In Re: Boston Scientific Corp.*, MDL No. 2326; and *In Re: Ethicon, Inc.*, MDL No. 2327. In these cases, Ms. Ruane assisted in general causation expert reports, briefed and argued *Daubert* motions, defended case-specific depositions and deposed case-specific physician, sales representative and expert witnesses. Ms. Ruane also second-chaired the first (and only) pelvic mesh jury trial against the defendant Coloplast, which resulted in a \$2.5 million verdict for the plaintiff.

Ms. Ruane is a current member of the District of Kansas Bench-Bar Committee. In this role, she works with six sitting judges from the District of Kansas to study and consider the Rules of the Court and serves as a liaison among the court, its bar and the public.

3. Jonathan Orent, Motley Rice LLC

Jonathan Orent is a partner at Motley Rice. Mr. Orent was appointed lead counsel in the hernia mesh litigation *In re Atrium Medical Corp. C-QUR Mesh Products Liability Litigation*, MDL No. 2753, and serves as co-lead in the largest hernia mesh litigation in the country, *In re Davol/C.R. Bard Hernia Mesh Multi-Case Management Coordination*, MDL

No. 2864. Mr. Orent was appointed to serve on Science and Expert committees in the *In re 3M Combat Arms Products Liability Litigation*, MDL No. 2885. Mr. Orent has led and been a member of multiple trial teams, including the following: lead trial counsel, securing a \$ 4.8 million verdict in *Trevino v. C.R. Bard* (2022); trial counsel, helped win a \$100 million verdict in *Barba v. Boston Scientific Corp.* (2015) (later reduced by appeal to \$10 million); and lead appellate counsel successfully reversed defense verdict in *Albright v. Boston Scientific Corp.*

Outside of his medical device work, Jonathan represents children and parents who allege Instagram purposefully designed its platform to be addictive to young people and increased its user growth at the expense of the mental health of its users. Mr. Orent currently serves as Co-Chair of the Science & Expert committee in the *In re: Social Media Cases*, JCCP No. 5255 (Cal. Sup. Ct.).

In addition to his litigation experience, Mr. Orent is active in the Sedona Conference and regularly speaks in regard to ESI and discovery issues. Mr. Orent currently serves on the Sedona Conference Working Group 1 Drafting committee that publishes important and influential commentary in the field of e-discovery. Mr. Orent also serves as an adjunct professor at the Roger Williams University School of Law, where he teaches mass torts seminars, and serves on the Board of Governors for the Rhode Island Association for Justice.

4. Paul Pennock, Morgan & Morgan P.A.

Paul Pennock is the Managing Partner of the Mass Tort Litigation Practice Group at Morgan & Morgan, P.A.. Previously, Mr. Pennock was the Co-Chair of the Pharmaceutical and Medical Device group at Weitz & Luxenberg, P.C. Mr. Pennock filed the first action in federal court in August 2023 related to the GLP-1 class of medications. In December 2023, Mr. Pennock moved for the consolidation of Novo Nordisk and Eli Lilly in this

MDL. Mr. Pennock and his firm are investigating over 10,000 individuals who have allegedly been injured by this class of medications.

Over the decades, Mr. Pennock has been appointed to several leadership roles including liaison counsel, plaintiff steering committees, and/or co-lead counsel in numerous state and federal MDL mass tort litigations. Mr. Pennock previously served as co-lead counsel for *In Re: Actos Products Liability Litigation*, MDL 2299; *In Re: Ethicon, Inc., Power Morcellator Products Liability Litigation*, MDL 2652; and *In Re: Seroquel Products Liability Litigation*, MDL 1769. As co-lead counsel for *In Re: Actos Products Liability Litigation*, Global Settlement Resolution occurred approximately 28 months following MDL creation where Mr. Pennock was part of the trial teams in both federal and state court. In 2015, as co-lead counsel of the *In Re: Ethicon, Inc., Power Morcellator Products Liability Litigation*, Mr. Pennock helped lead a settlement within one year of the MDL's inception.

Currently, Mr. Pennock is co-lead counsel, along with Ms. Aminolroaya, for *In Re: Elmiron (Pentosan Polysulfate Sodium) Products Liability Litigation*, MDL 2973, in the District of New Jersey, which is now in the resolution phase with almost all settlements processed. Mr. Pennock was a member of the Plaintiffs' Executive Committee for *In Re: 3M Combat Arms Earplug Products Liability Litigation*, MDL 2885, before the Hon. M. Casey Rodgers, and *In Re: Proton-Pump Inhibitor Products Liability Litigation*, MDL 2789, which are also both in the resolution phase and settlements being processed. Mr. Pennock is co-lead counsel for *In Re: Gardasil Products Liability Litigation*, MDL 3036; this litigation has been ongoing for several years and discovery is significantly underway. Mr. Pennock's role in this litigation has been primarily focused on expert discovery, which is in a good posture allowing for his principal time and devotion to this matter.

Many of the litigations Mr. Pennock has been involved with involved the trial of

bellwether cases where Mr. Pennock was lead or co-lead counsel. Most recently, Mr. Pennock was co-counsel in a bellwether trial for *In Re: 3M Combat Arms Earplug Products Liability Litigation*, MDL 2885, which resulted in a \$13.2 million verdict. Mr. Pennock has also served as lead counsel in many science/*Daubert* hearings in both state and federal court since 1995.

E. Each Proposed Co-Lead Counsel Has Access to Sufficient Resources to Prosecute the Litigation in a Timely Manner

Each proposed Co-Lead Counsel has access to a large professional staff of attorneys, paralegals, and administrative staff. Ms. Aminolroaya's firm has 42 attorneys, Ms. Ruane's firm has 34 attorneys, Mr. Orent's firm has over 100 attorneys, and Mr. Pennock's firm has over 1,000 attorneys. As discussed above, the proposed Co-Lead Counsel would also draw upon the expertise and resources of other plaintiffs' counsel in these proceedings on an as-needed basis to handle discrete assignments and tasks.

Each proposed Co-Lead Counsel also has adequate financial resources to litigate this case to a successful completion, including through trial and appeal if necessary, and have developed unique insights into the staffing and funding needed to litigate large mass tort actions like this one.

IV. CONCLUSION

The undersigned respectfully seek appointment of (1) the following attorneys as Co-Lead Counsel: (i) Parvin Aminolroaya of Seeger Weiss LLP; (ii) Sarah Ruane of Wagstaff & Cartmell LLP; (iii) Jonathan D. Orent of Motley Rice LLC; and (iv) Paul Pennock of Morgan & Morgan, P.A.; (2) the following attorneys as Liaison Counsel: (i) Roberta Liebenberg of Fine Kaplan and Black, R.P.C.; and (ii) Nina Spizer of Dilworth Paxson LLP; (3) the attorneys so identified in Exhibit A as members of the Plaintiffs' Executive Committee; and (4) the attorneys so identified in Exhibit A as members of the Plaintiffs' Steering Committee.

A Proposed Order granting this requested relief is submitted with this application.

Dated: March 21, 2024

Respectfully submitted,

/s/ Parvin K. Aminolroaya

Parvin K. Aminolroaya

SEEGER WEISS LLP

55 Challenger Rd., 6th Floor

Ridgefield Park, NJ 07660

Telephone: (973) 639-9100

Email: paminolroaya@seegerweiss.com

/s/ Jonathan Orent

Jonathan Orent

MOTLEY RICE LLC

40 Westminster St., 5th Floor

Providence, RI 02903

Telephone: (401) 457-7700

Email: jorent@motleyrice.com

/s/ Sarah Ruane

Sarah Ruane

WAGSTAFF & CARTMELL

4740 Grand Avenue Suite 300

Kansas City, MO 64112

Telephone: (816) 701-1123

Email: sruane@wcllp.com

/s/ Paul Pennock

Paul Pennock

MORGAN & MORGAN

350 Fifth Avenue, Suite 6705

New York, NY 10118

Telephone: (212) 738-6299

Email: ppennock@forthepeople.com

Proposed Co-Lead Counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March 2024, a true and correct copy of the accompanying document was filed with the Clerk of Court via the Court's CM/ECF system for electronic service to all counsel of record.

/s/ David Buchanan
David R. Buchanan

EXHIBIT A

**IN RE: GLUCAGON-LIKE PEPTIDE-1 RECEPTOR AGONISTS
(GLP-1 RAS) PRODUCTS LIABILITY LITIGATION**

PROPOSED LEADERSHIP SLATE

Proposed Co-Lead Counsel

Paul Pennock
Morgan & Morgan

Jonathan Orent
Motley Rice

Sarah Ruane
Wagstaff & Cartmell

Parvin Aminolroaya
Seeger Weiss

Proposed Liaison Counsel

Bobbi Liebenberg
Fine, Kaplan & Black

Nina Spizer
Dilworth Paxson

Proposed Plaintiffs' Executive Committee

Bradley Honnold
Goza & Honnold
Proposed Co-Chair

Mike Daly
Pogust Goodhead
Proposed Co-Chair

Daniel Seltz
Lieff Cabraser Heimann &
Bernstein

D. Nicole Guntner
Aylstock, Witkin, Kreis &
Overholtz

Keith Verrier
Levin Sedran & Berman

Alex Walsh
Alex Walsh Law

Evan Buxner
The Gori Law Firm

Ryan Duplechin
Beasley Allen Law Firm

Daniel Nigh
Nigh Goldenberg Raso & Vaughn

Diandra "Fu" Debrosse
Zimmerman
DiCello Levitt

W. Cameron Stephenson
Levin, Papantonio, Rafferty,
Proctor, Buchanan, O'Brien, Barr &
Mougey

Proposed Plaintiffs' Steering Committee

Rosemarie Bogdan
Harding Mazzotti

Noah Lauricella
Goldenberg Lauricella

Sara Schramm
Hammers Law Firm

Layne Hilton
Meyer Wilson

Lee Floyd
Breit Biniazan

Jason Goldstein
Parker Waichman

Ellen Presby
Ferrer Poirot Feller Daniel

Stacy Hauer
Johnson Becker

Digger Earles
Laborde Earles Injury Lawyers

Daniel Robinson
Robinson Calcagnie

Sara Couch
Motley Rice

Danae Benton
The Cochran Firm

Craig Sullivan
Sullivan Paipan Block McManus
Coffinas & Cannavo

EXHIBIT B

SEEGER WEISS LLP

Parvin K. Aminolroaya

Parvin K. Aminolroaya, a partner at Seeger Weiss, is an emerging leader in the plaintiffs' bar. Her practice focuses on representing plaintiffs in mass tort and class action litigation with a focus on product liability cases. She has extensive experience in pharmaceutical and device injury litigation, having been appointed co-lead counsel in the *Elmiron Litigation* and serving on trial teams in the *3M Earplug Litigation*, *Bard Hernia Mesh Litigation* and *Testosterone Replacement Therapy Litigation*.

Law Firm Affiliations

- Seeger Weiss LLP. Partner and formerly Associate Attorney. 2008 to present.

MDL and Complex Litigation Experience

- *In re: Elmiron Products Liability Litigation*
 - Appointed Co-Lead Counsel by the Honorable Judge Brian R. Martinotti
 - Alongside co-lead counsel, developed the expert strategy for the case, handled key regulatory and marketing depositions, and led the defense to challenges to the plaintiff's experts in the first bellwether case
 - Helped secure confidential settlements on behalf of plaintiffs who suffered permanent eye injuries
- *In re: 3M Combat Arms Earplug Products Liability Litigation*
 - Seeger Weiss team appointed Co-Lead Counsel
 - Worked on development of key general causation and damages experts who testified in multiple bellwether trials
 - Presented and prepared expert witnesses as a member of two bellwether trial teams. Developed general and case specific causation and damages experts for multiple bellwether plaintiffs.
 - Litigation settled for over \$6 billion
- *In Re: National Prescription Opiate Litigation*
 - Seeger Weiss team appointed to Plaintiffs' Executive Committee, co-led development of key regulatory expert who offered opinions on the misconduct of drug manufacturers that directly contributing to the opioid epidemic
 - Worked with lead counsel to prepare and present witness for Daubert hearings and trial preservation deposition
 - Drafted multiple Daubert opposition briefs
 - Took regulatory, marketing, and lobbying corporate depositions of a key opioid manufacturer

- *In re: Davol, Inc./C.R. Bard, Inc. Polypropylene Hernia Mesh Products Liability Litigation*
 - Co-lead development of the regulatory expert's report on five Hernia Mesh devices
 - Second-chaired the expert's deposition and trial testimony
- *In re: Testosterone Replacement Therapy Products Liability Litigation*
 - Member of trial teams for first three bellwether cases
 - Participated in trial briefing and assisted with preparation and presentation of a key expert resulting in initial verdicts of \$290 million

Other Notable Representations

- VW Clean Diesel Litigation
 - Member of the team appointed to the executive committee and second chair on several depositions in this consumer class MDL proceeding against Volkswagen over allegations that the company failed to meet diesel emissions standards, resulting in a \$14.7 billion settlement, the biggest corporate settlement in history
- Madoff Fraud Litigation
 - Obtained dismissal of or settled numerous lawsuits brought by the Madoff Trustee seeking to recover tens of millions of dollars
- Co-Lead expert work on CPAP, expected to conclude in Spring 2024
- Co-Lead expert work on East Palestine, expected to conclude in Spring 2024

Other Relevant Experiences

- US Securities and Exchange Commission. Legal Intern. January 2008 to April 2008.
- JPMorgan Chase. Legal Intern, May 2007 to August 2007.

Education

- Cardozo School of Law, J.D. 2008. Moot Court Honor Society, Jacob Burns Medal for Outstanding Contribution to Moot Court, Benjamin N. Cardozo Writing Award for Best work not for publication, Securities Arbitration Clinic, Legal Writing Teaching Assistant.
- Fordham University, B.A. 2004, Dean's list. Staff Writer for *The Observer*.

Community Involvement

- Badge of Honor Memorial Foundation
 - Represented family of deceased California police officer in efforts to obtain payment from the federal government whose investigation of an illegal drug ring allegedly led to the officer's illness and premature death.
- The Benjamin N. Cardozo Summer Law Institute
 - Volunteer guest speaker to classes of rising ninth graders participating in an intensive academic summer program focusing on criminal law.

- Cardozo Law School, Black Asian Latino Law Students Alumni Group Association
- The Seeger Weiss Diversity Fellowship
 - Spearheaded a fellowship that provides an award of up to \$14,000, plus an additional \$3,000 charitable contribution to a nonprofit organization of their choice, to a rising second-year law student who shows promise as an attorney and contributes to the diversity of Seeger Weiss and the legal community.

Recognition

- National Trial Lawyers: Top 100 Trial Lawyers
- Jacob Burns Medal for outstanding contribution to Moot Court, Benjamin N. Cardozo School of Law Writing Award
- Lawdragon 500 Leading Lawyers in America, 2024
- Lawdragon 500 X - Next Generation, 2023
- Law360 Rising Star: Product Liability, 2022
- Best Lawyers in America: U.S. News & World Report – Mass Tort Litigation / Class Actions: Plaintiffs, 2021-2024
- National Law Journal’s Elite Trial Lawyers Rising Star of the Plaintiffs Bar, 2021
- Lawdragon 500 Leading Plaintiff Financial Lawyers, 2020-2023
- Top Women in Law, New Jersey Law Journal, 2020
- Lawdragon 500 Leading Plaintiff Consumer Lawyers 2019-2024
- Game Changer Award, Benjamin N. Cardozo School of Law, Black Asian Latino Law Students Alumni Group Association, 2019
- Young Leadership Award, Benjamin N. Cardozo School of Law Alumni Association, 2016
- New York Super Lawyers, Rising Stars, 2014-2021
- Benjamin N. Cardozo School of Law Writing Award – Best Written Work for Publication, 2008
- Best Brief, New York City Bar Association National Moot Court Competition – Regional Round, 2007
- Best Petitioner Brief, Fordham Law School Irving R. Kaufman Memorial Securities Competition, 2007

EXHIBIT C

Curriculum Vitae

Sarah Steen Ruane

Business Address: Wagstaff & Cartmell, LLP
4740 Grand Avenue
Suite 300
Kansas City, MO 64112
Phone: (816) 701-1123
Fax: (816) 518-7189
Email: sruane@wcllp.com

Education:

| | | | | |
|------|------|------------------------|-------------------|---------------------|
| 2003 | B.A. | Wake Forest University | Winston-Salem, NC | Spanish & Sociology |
| 2006 | J.D. | University of Kansas | Lawrence, KS | |

Legal Experience:

Sarah Ruane is a partner and Chair of the Litigation Management Committee at the Kansas City-based Wagstaff & Cartmell LLP. Sarah has served as trial counsel, including lead counsel, in 10 jury trials in federal and state court, nearly all of which were cases involving drugs, medical devices, and health care services. As Chair of her firm's Litigation Management Committee, she assigns and manages teams of lawyers and staff for all of the firm's national mass tort and class action cases to ensure optimal, efficient performance for the firm's clients.

Sarah has gained broad experience in pharmaceutical and medical device cases under the supervision and leadership of Tom Cartmell, who has served as plaintiffs' co-lead counsel and co-lead trial counsel in several large MDLs that resolved successfully. Sarah worked extensively on trials and in discovery over the past decade in the national Pelvic Mesh Repair System Products Liability Litigation, which included *In Re: C.R. Bard, Inc.*, MDL No. 2187; *In Re: American Medical Systems, Inc.*, MDL No. 2325; *In Re: Boston Scientific Corp.*, MDL No. 2326; and *In Re: Ethicon, Inc.*, MDL No. 2327. In these cases, Sarah assisted in general causation expert reports, briefed and argued *Daubert* motions, defended case-specific depositions and deposed case-specific physician, sales representative and expert witnesses. Sarah also second-chaired the first (and only) pelvic mesh jury trial against the defendant Coloplast, which resulted in a \$2.5 million verdict for the plaintiff.

In the National Opioid MDL No. 2084, Sarah helped build the liability case against the Teva defendants. She performed all aspects of discovery in the MDL, from ESI negotiation and document review to taking depositions of corporate witnesses. She also represented Buchanan

County, Missouri, which had one of the highest rates of opioid prescriptions in the country.

Sarah's entire career has been with Wagstaff & Cartmell, which has grown during her tenure to 34 attorneys and 52 other employees. The firm handles complex litigation nationwide in the areas of product liability, consumer fraud, class actions, antitrust, corporate malfeasance, professional liability, and representation of public entities.

Sarah is a current member of the District of Kansas Bench-Bar Committee. In this role, she works with six sitting judges from the District of Kansas to study and consider the Rules of the Court and serves as a liaison among the court, its bar and the public.

Bar Admissions:

| | |
|------|---|
| 2006 | Missouri U.S. District Court, Western District of Missouri |
| 2007 | Kansas District of Kansas |
| 2023 | District of Colorado |

Bar Associations:

| | |
|---------|--|
| Present | Kansas Bar Association The Missouri Bar Association American Association for Justice American Bar Association Lawyers Association of Kansas City Kansas City Metropolitan Bar Association |
|---------|--|

Presentations/Speaking Engagements:

| | |
|----------|---|
| Speaker: | Harris Martin's Ozempic MDL Conference: March 15, 2024 Philadelphia, PA |
| Speaker: | Harris Martin's MDL Conference: Ozempic and Suboxone Litigation: January 24, 2024, Santa Barbara, CA |
| Speaker: | Harris Martin's Ozempic Plaintiff Conference: An Emerging Litigation: December 1, 2023, Charleston, SC |

Awards:

SuperLawyers Rising Star, 2011-2021

Ingram's 30 Under 30 Kansas City

EXHIBIT D

CURRICULUM VITAE

NAME: Jonathan David Orent
PRIMARY AFFILIATION: Motley Rice LLC
MAIL/ CONTACT:
Motley Rice LLC
40 Westminster St., Fifth Floor
Providence, RI 02903
(401)465-8549
E-MAIL: jorent@motleyrice.com
WEBSITE: <http://www.motleyrice.com>

CAREER HIGHLIGHTS:

- Litigates for people alleging harm from defective medical devices and pharmaceutical drugs, including trial and all aspects of discovery and expert development.
- Represents clients suffering from severe complications from GLP-1 RA prescriptions, women suffering from painful side effects associated with pelvic mesh/sling products, hernia patients harmed by mesh repairs, military service members suffering from hearing loss due to allegedly defective earplugs and children harmed by social media.
- Appointed lead counsel of hernia mesh litigation *In re Atrium Medical Corp. C-QUR Mesh Products Liability Litigation*, MDL #2753 (currently winding down). Serves as co-lead and co-liaison counsel in the largest consolidated hernia mesh litigation in the country, *In re Davol/C.R. Bard Hernia Mesh Multi-Case Management Coordination*.
- Has significant trial and appellate courtroom experience including the following: lead trial counsel, securing a \$ 4.8 million verdict in *Trevino v. C.R. Bard* (2022); trial counsel, helped win a \$100 million verdict in *Barba v. Boston Scientific Corp.* (2015) (later reduced by appeal to \$10 million); and lead appellate counsel successfully reversed defense verdict in *Albright v. Boston Scientific Corp.*
- Appointed to the Science & Expert Subcommittee for multidistrict litigation filed for U.S. troops who served in Iraq and Afghanistan between 2003 and 2015 and suffered hearing loss or tinnitus after using allegedly defective earplugs manufactured by 3M and its predecessor Aearo Technologies and on the Science and Expert.

CV: Orent page 2 of 5

- Co-Chair of the Expert and Science Committee for multidistrict litigation and consolidated state court action representing children and adolescents harmed by social media.

EMPLOYMENT:

Motley Rice LLC- Attorney at Law (2005-Present)

Motley Rice LLC- Member (2017- Present)

ESI Committee: Chair

Salary and Bonus Committee: Member

Motley Rice LLC – Associate (2005-2017)

Roger Williams University School of Law- Adjunct Professor
(2023- present)

Past: Motley Rice LLC (Summer Associate); United States Senate, Governmental Affairs Committee Office of Senator Richard Durbin of Illinois; United States House of Representatives Office of John Tierney of Massachusetts; United Kingdom House of Commons, Office of Michael Hancock C.B.E. M.P for Portsmouth South, Missouri State Public Defender, Youth Advocacy Unit (Summer Legal Intern)

PROFESSIONAL LICENSES/ COURT ADMISSIONS:

Commonwealth of Massachusetts; United States District Court for the District of Massachusetts; State of Rhode Island; United States District Court for the District of Rhode Island; State of Wisconsin; United States District Court for the Eastern District of Wisconsin; United States District Court for the Western District of Wisconsin

AWARDS:

ALM/ Law.com 2023: Distinguished Leader in the Law
Rhode Island Lawyer's Weekly: 2022 Leader in the Law
Best Lawyers: 2023-2024

Martindale Hubbell: A/V Rated

Public Justice: Trial Lawyer of the Year 2014

Super Lawyers, Rising Star: 2014-17; Super Lawyer 2017-23
Rhode Island Monthly: Excellence in the Law 2022

CURRENT COURT APPOINTMENTS:

Lead Counsel, *In re Atrium Medical Corp. C-QUR Mesh Products Liability Litigation*, MDL #2753
Co-chair Expert and Science Committee, *In re: Social Media Cases*, JCCP No. 5255 (Cal. Sup. Ct.)
Co-Lead Counsel, *Betty Ann Smith v. Covidien*, Middlesex County Mass.
Co-Lead and Liaison Counsel, *In re Davol/ C.R. Bard Hernia Mesh Multi-Case Management Coordination*, Providence County
Liaison Counsel, *In re: Specially Assigned Mesh Implant Cases*, Docket Number 11-3750M, Middlesex County, MA
Liaison Counsel, *In re: Specially Assigned Mesh Implant Cases*, Docket Number 13-5100M-2, Middlesex County, MA
Liaison Counsel, *In re: Pelvic Mesh Litigation / Bard*, Case Number 292, Atlantic County, NJ
Member Plaintiff Steering Committee, *In re: Levaquin Litigation*, Case Number 286, Atlantic County, NJ

MAJOR CASE EXPERIENCE:

Trevino v. C.R. Bard Inc., No. 2018-8437 (R.I. 2022)
Albright v. Boston Scientific, No. 2015-P-0633 (Mass. App. 2016)
Allen v. Boston Scientific, No. 2012-P-1578 (Mass. App. 2013)
Barba v. Boston Scientific, C.A. No. N11C-08-050 MMJ (Del. Super. 2015)
In Re C. R. Bard, Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2187
In Re American Medical Systems, Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2325
In Re Boston Scientific Corp. Pelvic Repair System Products Liability Litigation, MDL No. 2326
In Re Ethicon, Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2327
In Re Coloplast Corp. Pelvic Support Systems Products Liability Litigation, MDL No. 2387
In Re Cook Medical, Inc., Pelvic Repair System Products Liability Litigation, MDL No. 2440

CV: Orent page 4 of 5

In re: Avaulta Pelvic Support Systems, MDL 2187
In re: Pelvic Mesh Litigation/ AMS (Shores v. AMS., et al.),
New Castle County, DE
In re: Pelvic Mesh Litigation / Bard, Case Number 292,
Atlantic County, NJ
*In re: Pelvic Mesh Litigation / Boston Scientific (Adkins v.
Boston Scientific, et al.)*, Middlesex County, MA
In re: Pelvic Mesh Litigation / Gynecare, Case Number 291,
Atlantic County, NJ
In re: Levaquin Litigation, Case Number 286, Atlantic
County, NJ
In re: Kugel Mesh Hernia Patch Litigation, MDL 1842
In re: Kugel Mesh Hernia Patch Litigation, Providence
County, Rhode Island
McMunn et al., v. Babcock and Wilcox, U.S.D.C. W.D. PA
Ward et al., v. Lockheed Martin, Manatee County, FL
Corvello et al., v. New England Gas Company, U.S.D.C. RI
State of Rhode Island v. Lead Industries Association,
Providence County, RI
People v. Atlantic Richfield Company, et al., County of Santa Clara,
CA

PUBLICATIONS: Christina M. Behm, Esq. & Jonathan Orent, Esq., *Discovery in Mass Tort Litigation/ Consolidated Cases*, in A Practical Guide to Discovery & Depositions in Rhode Island, 33-1, (MCLE, Inc. 3d ed, 2022)

REPRESENTATIVE PRESENTATIONS:

HarrisMartin's Ozempic MDL Conference: Updates from the Status Hearing, March 15, 2024
HarrisMartin's Webinar Series: Ozempic MDL Developments February 09, 2024
HarrisMartin's MDL Conference: Ozempic and Suboxone Litigation January 24, 2024
HarrisMartin's Ozempic Plaintiff Conference: An Emerging Litigation December 01, 2023
HarrisMartin's The Art of Litigation Conference: Crafting a Better Practice November 30, 2023
HarrisMartin's Webinar Series: Ozempic Litigation September 06, 2023

Specific Causation in Mass Tort Cases: Harris Martin Webinar Series, February 3, 2022

AAJ Rapid Response Litigation Update: Physiomesb, February 9, 2017

Contaminated Groundwater Claims, Proving Liability and Negotiating Damages, National Business Institute, December 21, 2015

Mass Torts, Citizens Law School, September 20, 2013, Providence, RI

Contaminated Groundwater Litigation, National Business Institute, May 28, 2013

Transvaginal Surgical Mesh, Plaintiff Pharma Forum, March 15, 2013, HB Litigation Conference, Los Angeles, CA

Current Trends in Lead Litigation, October 4, 2011 HB Litigation Conference, Amelia Island, FL

Informed Consent: Talking with Your Patients About Vaginal Mesh, American Urogynecological Society's Annual Scientific Conference, September 15, 2011, Providence, RI.

NJ Pelvic Mesh Litigation Workshop, September 14, 2011, Atlantic City, NJ

Environmental Health and Chemical Exposures: Law and Science, March 30, 2010, Co-sponsored by the Brown University Superfund Research Program, Providence, RI

Legal and Scientific Issues in Selecting Environmental Cases, March 11, 2010, TACTIX Seminar, Charleston, SC

Working Through Potential Case "Pollution" in Environmental Contamination Cases: October 14, 2008, TACTIX Seminar, Charleston, SC

Lead Litigation Update: Mealey's Publications, December, 2007

Eliminating Childhood Lead Poisoning: December 26, 2006, Harris Martin Seminar, Scottsdale, AZ

AFFILIATIONS:

American Bar Foundation: Life Fellow

Complex Litigation E-Discovery Forum: Member

Sedona Conference: Member Working Group 1

Rhode Island Association for Justice: Member Board of Governors

American Association for Justice: Member and Chair: Hernia Mesh Litigation Group; Co-Applicant Ozempic Litigation Group

CV: Orent page 6 of 5

(Past) Member: State Advisory Committee to the United States Commission on Civil Rights for the State of Rhode Island;
President: Alexander Graham Bell Society, Rhode Island Chapter

EDUCATION:

1997-Diploma, Norwood Senior High School, Norwood, MA
2001-B.A. Political Science, Certificate in International Relations, University of Rochester, Rochester, NY
2004-J.D. Washington University School of Law, Washington University, St. Louis, MO

EXHIBIT E

Curriculum Vitae

Paul J. Pennock

Business Address: Paul J. Pennock
MORGAN & MORGAN
350 Fifth Avenue
Suite 6705
New York, NY 10118
Phone: (212) 738-6839
Fax: (917) 344-7061
Email: ppennock@forthepeople.com

Education:

1984 Syracuse University, B.A.
1988 St. John's University, J.D.

Legal Experience:

1992 - Present

Mr. Pennock is the Managing Partner of the Mass Tort Litigation Practice Group at Morgan & Morgan, P.A. Previously, for over two decades, Mr. Pennock was Co-Chair of the Pharmaceutical and Medical Device practice group at Weitz & Luxenberg. He is directly responsible for leading a large national litigation department involving all aspects of litigation from inception through trial. He has served as lead plaintiffs' counsel as well as plaintiff steering committee member liaison counsel in numerous state and federal MDL mass tort litigations, including Co-Lead of the Actos MDL and Elmiron MDL. Mr. Pennock has handled numerous "bellwether" trials and Daubert hearings in both state and federal courts. In 2007, he was honored with the invitation to author the mass tort litigation chapter in a two volume legal treatise, Higgs, The Plaintiff's Personal Injury Action in New York, Ch. 4 (2009), which was published in 2009.

Bar Admissions:

1989 New York
1991 U.S. District Court, Southern District of New York
1997 U.S. District Court, Eastern District of New York
2003 United States Supreme Court
2005 U.S. District Court, Western District of New York
2011 U.S. District Court, Northern District of New York

2014 United States Court of Appeals, 5th Circuit
2020 District of Colorado

Bar Associations:

Present New York State Bar Association
New York State Trial Association
American Association for Justice
American Bar Association
The National Trial Lawyers Top 100

Litigation Leadership Roles:

Co-Lead Counsel

Actos Products Liability Litigation, MDL No. 2299, Co-Lead Counsel

Ethicon, Inc., Power Morcellator Products Liability Litigation, MDL No. 2652, Co-Lead Counsel

Seroquel Products Liability Litigation, MDL No. 1769, Co-Lead Counsel

Elmiron Products Liability Litigation, MDL No. 2973, Co-Lead Counsel

Gardasil Products Liability Litigation, MDL 3036, Co-Lead Counsel

Plaintiffs' Executive Committee

3M Combat Arms Earplug Products Liability Litigation, MDL 2885

Proton-Pump Inhibitor Products Liability Litigation, MDL 2789, Co-Chair of Plaintiffs' Executive Committee

Plaintiffs' Steering Committees

Accutane Products Liability Litigation, MDL No. 1626

DePuy Orthopaedics, Inc., Pinnacle Hip Implant Products Liability Litigation, MDL No. 2244, Science Committee

Guidant Corp. Implantable Defibrillators Products Liability Litigation, MDL No. 1708

New York State ReNu with MoistureLoc Product Liability Litigation, Index No. 766,000/2007

Yasmin and Yaz (Drospirenone) Marketing, Sales Practices and Products Liability Litigation, MDL No. 2100

Liaison Counsel

New York State ReNu with MoistureLoc Product Liability Litigation, Index No. 766,000/2007

New York State Silicone Breast Implant Litigation, Index No. 500,000/1993

Awards

Clarence Darrow, October 23, 2019

Publications:

Diane M. Zhang. "A Milestone in Gender Equality." Trial Jul. 2016: 44 – 47. Print

Pennock, Paul J. "Mass Tort Litigation in New York State Courts: A Practice Manual." The Plaintiff's Personal Injury Action in New York State. Volume One. New York State Bar Association, 2009

Merck's Strategy for Dealing with Vioxx: Why the Old Recipes for Success Won't Succeed. AML Law Journal Newsletters. LJN's Law Journal Newsletter. June/July 2005

Failure to Warn decisions in Pharmaceutical cases. How some Courts have gotten it wrong and why. August 2006

Increased Scrutiny of Pharmaceutical Company Clinical Trials - The Plaintiff Responds. AML Law Journal Newsletters. LJN's Product Liability Law & Strategy. Volume 25, Number 2. August 2006

Presentations/Speaking Engagements

Speaker: Harris Martin's MDL Conference: Zantac, Sex Trafficking and Emerging Mass Tort Litigation, January 29, 2020, Grand Hyatt Tampa Bay, Tampa, FL

Moderator: Harris Martin's MDL Conference: Sex Trafficking Litigation, December 4, 2019, Fairmont Austin, Austin, TX

Speaker: Mass Torts Made Perfect: The Cutting Edge: How to Approach the Human Trafficking Litigation, August 22, 2019, Webinar

- Speaker: Harris Martin's MDL Conference: Critical Developments in Mass Torts, MDLs, and Game-Changing Jurisprudence, May 29, 2019, The Ritz Carlton, New Orleans, LA
- Moderator & Speaker: Harris Martin's MDL Conference: Current Mass Torts from E-Discovery Through Exit Strategies - Navigating “Game-Changing” Dynamics, November 28 2018, The Westin New York Grand Central, New York, NY
- Speaker: Mass Torts Made Perfect: Human Trafficking: Taking Down Goliath and PPI Litigation, October 3 - 5, 2018, The Bellagio, Las Vegas, NV
- Panelist & Moderator: Harris Martin's MDL Conference: The Mass Tort Litigation Landscape - A Critical Analysis, September 25 - 26, 2018, Westin Verasa, Napa, CA
- Speaker: Harris Martin's MDL Conference: Opioid Litigation Landscape: Venues, Jurisdictional Hurdles, Defenses and Causes of Action, November 29, 2017, Four Seasons Hotel, St. Louis, MO
- Speaker: Louisiana State Bar Association, 17th Annual Class Action/Complex Litigation Symposium, November 10, 2017, Ritz-Carlton Hotel, New Orleans
- Speaker: Mass Torts Made Perfect, Nexium and Prilosec Litigation – Kidney Failure, October 19, 2017, Bellagio Hotel, Las Vegas, NV
- Speaker: Mass Torts Made Perfect, Nexium and Prilosec Litigation – Kidney Failure, April 27, 2017, Wynn Hotel, Las Vegas, NV
- Invitee Duke Law Center for Judicial Studies, Increasing the Number of Women and Minority Lawyers Appointed to Leadership Positions in Class Actions and MDLs, April 6-7, 2017, Atlanta, GA
- Speaker: Counsel Financial, AAJ 2017 Winter Convention, Building a Mass Torts Practice: Straight Talk from the Experts, February 12, 2017, JW Marriott, Austin, TX
- Co-Chair: Harris Martin's MDL Conference: Proton Pump Inhibitors, Eliquis, & Stryker Accolade Hip System, January 25, 2017, Nobu Eden Roc Hotel, Miami Beach, FL
- Attendee: AAJ Education for the Ethics of Mentoring and Being a Mentor Webinar, December 13, 2016. (will need to remove this because only an attendee not a presenter)*

- Co- Chair: Harris Martin's Proton Pump Inhibitors - Kidney Injury Litigation Conference, June 15, 2016, The Ritz-Carlton, Philadelphia, PA
- Moderator: Harris Martin's MDL Conference: 'Bet-the-Company' Mass Tort Litigation, Rapid Fire Updates on all Major Mass Tort Pharmaceutical and Medical Device Litigation, May 25, 2016, Thompson Chicago, Chicago, IL
- Speaker: Mass Torts Made Perfect, Morcellator Litigation, April 22, 2016, The Wynn, Las Vegas, NV
- Speaker: Louisiana State Bar Association, 15th Annual Class Action/Complex Litigation Symposium, November 13, 2015, Hyatt French Quarter Hotel, New Orleans, LA
- Co-Chair: Harris Martin's MDL Conference: Morcellator, Fluoroquinolone (FLQ) and Invokana Litigation, September 30, 2015, The Crowne Plaza Times Square, New York, NY
- Speaker: AAJ 2015 Annual Convention, Section on Toxic, Environmental, and Pharmaceutical Torts (STEP), July 13, 2015, Montreal Convention Center, Montreal, Canada
- Speaker: Louisiana State Bar Association, 14th Annual Class Action/Complex Litigation Symposium, Experts: How to Protect, Select and Survive Daubert - Expert Roundtables, Science Tutorials, Rule 706, and Principal Investigations, November 21, 2014, New Orleans, LA
- Speaker: Mass Torts Made Perfect, Actos Litigation Update, October 9, 2014, Bellagio Hotel, Las Vegas, NV
- Invitee Duke Law Center for Judicial Studies Multi-District Litigation (MDL) Best Practices Conference, Crystal Gateway Marriott, September 11-12, 2014, Arlington, VA
- Speaker: Perrin Conferences National Complex Litigation Conference: A Symposium on Current & Emerging Issues. The Role of Document Preservation and Sanctions in Mass Torts — A Necessary Protection or a New Sword, June 11, 2014, Omni Chicago Hotel, Chicago, IL

- Speaker: AAJ Education's Plaintiff-Only Hot Topics and Trends in Litigation Seminar: GM Auto Recall, Pharmaceuticals, and Medical Devices, May 27 - 28, 2014, Sheraton Chicago Hotel & Towers, Chicago, IL
- Speaker: Louisiana State Bar Association, 13th Annual Class Action/Complex Litigation Symposium Experts; How to Protect, Select, and Survive Daubert - Expert Roundtables, Science Tutorials, Rule 706, and Principal Investigators, November 22, 2013, Westin New Orleans Canal Place Hotel, New Orleans, LA
- Speaker: AAJ Annual Convention, Getting the FDA to Act: Testimony Before the FDA and How it Impacts Consumer Safety, July 22, 2013, Hilton, San Francisco, CA
- AAJ Annual Convention, Actos: Litigation Strategy, July 23, 2013, Hilton, San Francisco, CA
- Speaker: Louisiana State Bar Association, 12th Annual Class Action/Complex Litigation Symposium, Where's the Fifth Circuit on Daubert?, November 30, 2012, Ritz-Carlton Hotel, New Orleans, LA
- Speaker: HB Litigation Conferences: Plaintiff Forum on Pharmaceutical Litigation Transvaginal Mesh, Actos and Orthopedic Devices; Status of the Actos Litigation & Scientific Update, October 5, 2012, Le Meridien, Philadelphia, PA
- Speaker: AAJ, Actos Science, A Basic Background on Actos Bladder Cancer Litigation, July 28, 2012, Chicago, IL
- Speaker: Harris Martin's Mass Tort Litigation Conference with Judge Marina Corodemus (Ret.), Off Label vs. Approved Labeled Representations, June 4, 2012, The Ritz-Carlton Hotel, Philadelphia, PA
- Speaker: Mass Tort Strategies CLE Workshop, Actos: Act now? State & Federal Court Coordination - Criteria for Evaluating Cases, May 21, 2012, Trump International Chicago, IL
- Co-Chair/Speaker: MTMP Presents: Actos and Pelvic Mesh Litigation Conference, February 8, 2012, The Ritz-Carlton Hotel, Philadelphia, PA
- Co-Chair/Speaker: MTMP Presents: Mass Torts Forum: A Roundtable for Judges and Lawyers, February 9, 2012, The Ritz-Carlton Hotel, Philadelphia, PA

- Co-Chair/Speaker: Harris Martin's MDL Conference: Transvaginal Mesh and ACTOS Litigation, January 25, 2012, Miami, FL
- Speaker: Pharmaceutical & Medical Device Litigation, 11th Annual Class Action/Mass Tort Symposium, Louisiana State Bar Association, December 9, 2011, New Orleans, LA
- Speaker: Harris Martin's MDL Conference: Transvaginal Mesh and ACTOS Litigation, Actos Science, November 30, 2011, Savannah, GA
- Speaker: FDA/Advisory Committee (Ad-Comm), American Association for Justice Education, November 10, 2011, Yaz/Yasmin Teleseminar
- Speaker: Mass Torts Made Perfect Presents: The Regulatory Story - How Yaz and Yasmin Got Approved and Actos Litigation - Overview and Analysis, YAZ and SSRI/Birth Defect Litigation, September 13, 2011, Westin Hotel, Philadelphia, PA
- Speaker: Mass Torts Judicial Forum with Hon. Marina Corodemus (Ret.), Mass Tort Settlements-The Ideal and the Reality, June 27, 2011, The Rittenhouse Hotel, Philadelphia, PA
- Speaker: Harris Martin, Development of the Product: Design-Through-Recall Including FDA 510k Approval and DePuy's Promotion and Marketing of the ASR Hip, Johnson & Johnson DePuy Hip Implant Litigation Conference, November 17, 2010, Durham, NC
- Speaker: Yale Law School, The Case for Mass Torts, November 1, 2010, New Haven, CT
- Speaker: DRI's Corporate Counsel Roundtable, St. Regis Hotel, January 22, 2010, New York, NY
- Speaker: Mass Torts Made Perfect, Seroquel Update, October 15-16, 2009, Las Vegas, NV
- Lecturer: Medical Products Liability, Vioxx Liability, April 4, 2007, Brooklyn Law School
- Co-Chair: Mealeys' Vioxx Litigation Conference, December 11-12, 2006, Key Biscayne, FL
- Speaker: Mealey's Teleconference, Identifying the Emerging Areas of Pharmaceutical & Medical Device Litigation, August 17, 2006

Speaker Mealey's Teleconference, Contact Lens Solution Litigation, Focus on the Contact Solution Litigation, June 27, 2006

Speaker Mealey's Vioxx Litigation Conference, Verdicts & Mistrials - Where Are We Now? The Impact of the First Vioxx Trials on the Future of the Litigation, May 8 - 9, 2006, Amelia Island, FL

Speaker ATLA Heart Device Litigation Group, Guidant MDL Meeting, The Unsettled J&J Takeover of Guidant, December 15, 2005, Minneapolis, MN

Speaker Mealey's Vioxx Litigation Conference, What's Next?? A Look to the Future in the Vioxx Litigation, December 12 - 13, 2005, Las Vegas, NV

Speaker Mealey's Vioxx Litigation Conference, Consolidated Proceedings, NJ Update, December 12 - 13, 2005, 2005, Las Vegas, NV

Speaker Mealey's Vioxx Litigation Conference, Case Evaluation: What's New, June 22 - 23, 2005, New Orleans, LA

Speaker/Faculty Member New York State Trial Lawyers' Association, Federal Practice for State Practitioners, The Use of Jury Questionnaires and Motions *in Limine* from a Plaintiff's Perspective, April 6, 2005, New York, NY

Invitee Conference on Electronic Discovery, February 20-21, 2004, Fordham University School of Law, New York, NY

Speaker Mealey's Conference on Baycol Litigation, The Non-Rhabdo Case: Disease Processes With or Without Elevated Enzyme Levels, June 2- 3, 2003, Amelia Island, FL

Speaker The Association of the Bar of the City of New York, The Future of Expert Testimony, Science of Technical Testimony, January 30, 2003, New York, NY

Speaker Association of Trial Lawyers Association, Baycol and Its Impact on Elderly Women, October 25 - 26, 2002, Scottsdale, AZ

Speaker Mealey's PPA & Ephedra Litigation Conference, Medical Literature: What is Known Regarding Heart Attacks, Strokes and Psychosis, February 4 -5, 2002, Philadelphia, PA

Speaker Association of the Bar of the City of New York, The Future of Expert Testimony, January 30, 2002, New York, NY

Speaker Mealey's Conference on Baycol Litigation, Theories of Liability, January 14 -15, 2002, San Diego, CA

Speaker: St. John University Law School, Mass Torts: Plaintiffs' Counsel Perspective, November 26, 2001, Queens, NY,

Speaker Mealey's Conference on Propulsid Litigation, The "Hot" Documents and the "Key" Documents, June 14-15, 2001, New Orleans, LA

Speaker Mealey's Conference on Propulsid Litigation, Liability Issues Part I: The Internal Documents, January 22 - 23, 2001, New Orleans, LA

TV Dutch National Network. April 7, 2009.

Pro Bono

2004 Trial Lawyers Care, Inc. (TLC), providing legal representation to the victims of the September 11, 2001 terrorists attack and their families.

Other Facts

AAJ Above and Beyond Award 2017

Best Lawyers 2006 - 2017

New York Super Lawyers 2007 - 2016

Heard In-Flight Audio, Sky Radio Net, October 2007 in Airline Airlines and Northwest.

New York Magazine: 2005-2008

Practice Areas: Products Liability; Mass Torts; General Negligence

EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---|---------------------------------|---------------------------|
| IN RE: GLUCAGON-LIKE PEPTIDE-1 RECEPTOR AGONISTS (GLP-1 RAS) PRODUCTS LIABILITY LITIGATION |))))))) | Case No. 24-md-03094-GEKP |
|---|---------------------------------|---------------------------|

CASE MANAGEMENT ORDER NO.

AND NOW, this ____ day of March 2024, upon consideration of the Motion for Appointment of Plaintiff Leadership, the issues addressed therein are resolved as follows:

It is ORDERED that the following four counsel are appointed as Co-Lead Counsel for Plaintiffs: (i) Parvin Aminolroaya of Seeger Weiss LLP; (ii) Sarah Ruane of Wagstaff & Cartmell LLP; (iii) Jonathan D. Orent of Motley Rice LLC; and (iv) Paul Pennock of Morgan & Morgan, P.A..

It is FURTHER ORDERED that Roberta Liebenberg of Fine Kaplan and Black, R.P.C. and Nina Spizer of Dilworth Paxson LLP are appointed Liaison Counsel for Plaintiffs.

It is FURTHER ORDERED that the counsel identified below are appointed to the Plaintiffs’ Executive Committee:

Bradley Honnold
Goza & Honnold
Proposed Co-Chair

Mike Daly
Pogust Goodhead
Proposed Co-Chair

Daniel Seltz
Lieff Cabraser Heimann & Bernstein

D. Nicole Guntner
Aylstock, Witkin, Kreis &
Overholtz

Keith Verrier
Levin Sedran & Berman

Alex Walsh
Alex Walsh Law

Evan Buxner
The Gori Law Firm

Ryan Duplechin
Beasley Allen Law Firm

Daniel Nigh
Nigh Goldenberg Raso & Vaughn

Diandra “Fu” Debrosse
Zimmerman
DiCello Levitt

W. Cameron Stephenson
Levin, Papantonio, Rafferty, Proctor,
Buchanan, O'Brien, Barr & Mougey

It is FURTHER ORDERED that the counsel identified below are appointed to the Plaintiffs'

Steering Committee:

Rosemarie Bogdan
Harding Mazzotti

Noah Lauricella
Goldenberg Lauricella

Sara Schramm
Hammers Law Firm

Layne Hilton
Meyer Wilson

Lee Floyd
Breit Biniazan

Jason Goldstein
Parker Waichman

Ellen Presby
Ferrer Poirot Feller Daniel

Stacy Hauer
Johnson Becker

Daniel Robinson
Robinson Calcagnie

Digger Earles
Laborde Earles Injury Lawyers

Sara Couch
Motley Rice

Danae Benton
The Cochran Firm

Craig Sullivan
Sullivan Paipan Block McManus Coffinas
& Cannavo

It is SO ORDERED.

BY THE COURT:

s/

GENE E.K. PRATTER
UNITED STATES DISTRICT JUDGE