

HONIK  
LLC

*Via ECF*

**April 25, 2024**

Hon Renee Marie Bumb  
United States District Court  
District of New Jersey  
Mitchel H. Cohen Bldg., Courtroom 3D  
4<sup>th</sup> & Cooper Streets  
Camden, NJ 08101

Re: *In re Valsartan, Losartan, & Irbesartan Prods. Liab. Litig.*,  
No. 1:19-md-2875 (D.N.J.)

Dear Chief Judge Bumb:

Please accept this letter on behalf of the Plaintiffs. The purpose of the letter is: (i) to update and inform the Court about a resolution in principle with Defendant Aurobindo concerning irbesartan (one of the three drugs at issue in this litigation), and a prior settlement reached with the Hetero Defendants, and (ii) to request an in-person status conference with the Court.

First, Plaintiffs recently reached an agreement in principle with Defendant Aurobindo that will resolve all personal injury, economic loss, and medical monitoring claims concerning irbesartan manufactured by Aurobindo. The parties are in the process of preparing settlement related papers. The Court will also soon be receiving a motion for preliminary approval of a class settlement of valsartan economic loss claims previously reached with the Hetero Defendants. Other claims have also been resolved with Hetero, including class medical monitoring claims related to valsartan and losartan, and the personal injury claims related to valsartan and losartan.

Second, in light of the recent re-assignment of this matter to Your Honor, Plaintiffs believe an in-person status conference to address the pending issues in this litigation will greatly benefit all parties and the Court. Among the issues to be addressed would be the overall status of the litigation, the third-party payor subclass trial previously scheduled to begin on March 18, 2024, and the proposed pretrial order and motions in limine previously submitted to the Court for the third-party payor subclass trial. Plaintiffs suggest the parties confer and submit a proposed agenda at least seven days prior to any conference scheduled by the Court.

Thank you for your courtesies and consideration.

Respectfully,  
***MDL Plaintiffs' Co-Lead Counsel***

/s/ Ruben Honik

Ruben Honik

**HONIK LLC**

1515 Market Street, Suite 1100

Philadelphia, PA 19102

Phone: (267) 435-1300

[ruben@honiklaw.com](mailto:ruben@honiklaw.com)

/s/ Adam Slater

Adam Slater

**MAZIE, SLATER, KATZ & FREEMAN,  
LLC**

103 Eisenhower Pkwy, 2nd Flr.

Roseland, NJ 07068

Phone: (973) 228-9898

[aslater@mazieslater.com](mailto:aslater@mazieslater.com)

/s/ Conlee S. Whiteley

Conlee S. Whiteley

**KANNER & WHITELEY, LLC**

701 Camp Street

New Orleans, LA 70130

Phone: (504) 524-5777

[c.whiteley@kanner-law.com](mailto:c.whiteley@kanner-law.com)

/s/ Daniel Nigh

Daniel Nigh

**NIGH GOLDENBERG RASO &  
VAUGHN, PLLC**

14 Ride Square NW, 3rd Floor

Washington, DC 20016

Phone: (850) 600-8090

[dnigh@nighgoldenberg.com](mailto:dnigh@nighgoldenberg.com)