

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**IN RE: ZANTAC (RANITIDINE)  
PRODUCTS LIABILITY  
LITIGATION**

**MDL NO. 2924  
20-MD-2924**

**JUDGE ROBIN L. ROSENBERG  
MAGISTRATE JUDGE BRUCE E. REINHART**

\_\_\_\_\_ /  
**THIS DOCUMENT RELATES TO: ALL CASES**

**PRETRIAL ORDER # 45  
Order on Service of Discovery Requests and Responses**

This Order applies to all cases pending in MDL No. 2924 and to all actions transferred to or directly filed in MDL No. 2924 after the date of this Order. Nothing in this Order modifies or abridges the protections set forth in the Confidentiality Order, Pretrial Order # 26 (“PTO # 26”).

To promote efficiencies and the timely notice of service on the parties, Plaintiffs shall serve written discovery requests subject to Federal Rules of Civil Procedure 30, 31, 33, 34, 36, and 45—i.e., notices of depositions, interrogatories, requests for documents, requests for admission, and subpoenas—by sending electronic copies of such materials to: (1) the counsel of record for the individual Defendant to which such discovery is directed, if applicable; and (2) the following email address: xServiceZantac@arnoldporter.com. Defendants shall serve such written discovery by sending electronic copies of such materials to: (1) Michael McGlamry (mmcglamry@pmkm.com) and Tracy Finken (tfinken@anapolweiss.com); (2) the counsel of record for the individual Plaintiff to whom such discovery is directed, if applicable; and (3) the following email address: zdiscovery@pulaskilawfirm.com. Compliance with the foregoing provision shall constitute service pursuant to the Federal Rules of Civil Procedure and the Local Rules. This provision does

not relieve the parties from the requirements of service on third parties with respect to notices of deposition and subpoenas.

To promote efficiencies as to Defendants' production of documents to Plaintiffs, Defendants shall serve all productions made by electronic means such as file transfer protocol ("FTP") by providing access and any required passwords to the following: InsZantacTeam@opentext.com and Josh Schmitt (joshuas@opentext.com), with copies to Tracy Finken (tfinken@anapolweiss.com), Michael McGlamry (mmcglamry@pmkm.com), and Roopal Luhana (Luhana@chaffinluhana.com). Defendants shall serve productions made by physical means such as hard drive by mailing them to the following address:

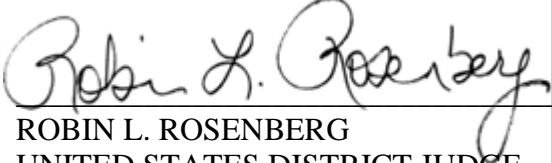
OpenText  
ATTN: Media – Zantac team  
1860 Blake Street, 7th Floor  
Denver, CO 80202

Defendants shall send production correspondence, including any transmittal letters and tracking numbers, to the following email addresses: InsZantacTeam@opentext.com and Josh Schmitt (joshuas@opentext.com), with copies to Tracy Finken (tfinken@anapolweiss.com), Michael McGlamry (mmcglamry@pmkm.com), and Roopal Luhana (Luhana@chaffinluhana.com).

When a third party responds to a subpoena or otherwise produces documents, items, or information pursuant to a subpoena issued in this litigation, the receiving party shall, subject to PTO # 26, ensure that copies of the response and/or responsive materials are produced to any other party to whom notice of the subpoena is required within seven (7) calendar days of receipt. Subject to PTO # 26, responses and documents received pursuant to any subpoena issued by a Defendant shall be provided to Plaintiffs via FTP to the zdiscovery@pulaskilawfirm.com email address. Subject to PTO # 26, responses and documents received pursuant to any subpoena issued by Plaintiffs shall be provided to Defendants via FTP to the xServiceZantac@arnoldporter.com email

address. If the documents to be provided by any party are too large for electronic transmission, that party shall provide notice to the opposing side via the applicable email address and request instructions for serving the production via physical means.

**DONE and ORDERED** in Chambers, West Palm Beach, Florida, this 29th day of September, 2020.



ROBIN L. ROSENBERG  
UNITED STATES DISTRICT JUDGE