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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

CASE NO. 20-md-02924-ROSENBERG

**IN RE: ZANTAC (RANITIDINE)** .  
**PRODUCTS LIABILITY** . West Palm Beach, FL  
**LITIGATION.** . July 1, 2021

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STATUS CONFERENCE (through Zoom)  
BEFORE THE HONORABLE BRUCE REINHART  
UNITED STATES MAGISTRATE JUDGE

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1           *THE COURT:* All right. Good afternoon, everybody. We  
2 are here in case number 20-md-2924, In re: Zantac (Ranitidine)  
3 Product Liability Litigation. We are here for a status  
4 conference on discovery matters.

5           Let me start by allowing the parties to appear. The  
6 first matter we are going to take up is the status report on  
7 the batch records relating to BI. Let me ask BI and the  
8 Plaintiffs to come in first. Who can I recognize for the  
9 Plaintiffs on this topic?

10          *MS. FINKEN:* Tracy Finken on behalf of Plaintiffs.  
11 Good afternoon, your Honor.

12          *THE COURT:* Good afternoon, Ms. Finken.

13          And on behalf of BI.

14          *MR. SHORTNACY:* Good afternoon, your Honor, Michael  
15 Shortnacy of King & Spalding for BI.

16          *THE COURT:* Good afternoon, Mr. Shortnacy.

17          We had a hearing two weeks ago and the parties said  
18 they wanted a little more time to confer. I think at the last  
19 hearing we had some clarity, I hope, that came to the  
20 discussion. So, bring me up to date on what you have been able  
21 to accomplish in the last two weeks.

22          Ms. Finken, I will let you go first.

23          *MS. FINKEN:* Sure. Your Honor, we had a very  
24 productive meet and confer earlier in the week that I thought  
25 answered some questions for us. We had gone back and conferred

1 with our experts and narrowed the scope of our request. We  
2 sent it over to BI this morning and we are scheduled to talk  
3 about it early next week. I think we are making some progress,  
4 there is nothing significant to report today.

5 *THE COURT:* Okay. Great. Mr. Shortnacy.

6 *MR. SHORTNACY:* Yes, your Honor, I agree with that,  
7 and I appreciate that the Plaintiffs have tried to narrow their  
8 request. Obviously, that is something that we are keenly  
9 interested in to be able to respond, and I do think that we  
10 have had productive discussions, and we hope that they  
11 continue. As Ms. Finken said, we are set to reconvene next  
12 week, having had a chance to digest their more narrowed  
13 questions to us today.

14 *THE COURT:* Very good. What is the respective  
15 parties' feelings on two things: One is if we should have  
16 another status check in; and secondly -- I think I talked about  
17 this in the context of GSK at the last hearing, but it applies  
18 equally well here.

19 We are approaching a decision point where either BI is  
20 going to say we are done producing and we have made a  
21 reasonable effort and we're done, and the Plaintiffs can then  
22 file whatever motions they want to file. I would like to set  
23 some deadlines to reach that.

24 Mr. Shortnacy, what is your feeling on how close we  
25 are to that tipping point?

1           *MR. SHORTNACY:* Well, your Honor, I feel like the  
2 point is becoming more clearly in focus, I believe, and as  
3 Plaintiffs are, as Ms. Finken said, apparently working with  
4 their experts and trying to kind of focus and bring the  
5 questions that I think could conceivably be answered to us, I  
6 think we are getting closer to that point.

7           I do think we need -- we have just been given today  
8 those more focused questioned. We need to digest them. I  
9 haven't discussed this with Ms. Finken. I know others on her  
10 team also would probably want a say, but I think another  
11 check-in to have -- in two weeks may be doable.

12           I am sure that we will know more quickly based on the  
13 progress we are able to make next week in our scheduled meet  
14 and confer and can probably update the Court thereafter, but I  
15 understand the Court's desire to kind of keep things on  
16 calendar so that progress gets made.

17           Those are my thoughts.

18           *THE COURT:* You think maybe another status in ten  
19 days, two weeks?

20           *MR. SHORTNACY:* I think that sounds reasonable.

21           *THE COURT:* Ms. Finken.

22           *MS. FINKEN:* Your Honor, I agree with that. I think  
23 that we will be in a position at the next status conference to  
24 have an understanding on whether or not we actually have a  
25 dispute that we need an answer to. I think that is a fair --

1           *THE COURT:* What I will do is set another hearing  
2 for -- let me look at my calendar. How about July 15th, at one  
3 o'clock, does that work for everybody?

4           *MS. FINKEN:* Yes, your Honor.

5           *THE COURT:* July 15th, at one o'clock for -- I am  
6 going to call it a final status report, and at that point I am  
7 going to set a firm deadline where we are either going to -- we  
8 are going to join the issue. So, be thinking, when you come  
9 back on the 15th, if you haven't reached an agreement on  
10 everything, if you have thoughts on when the deadline should  
11 be, but we are going to have a firm deadline set on that date.

12          *MS. FINKEN:* Thank you, your Honor.

13          *THE COURT:* Thank you both very much, I appreciate the  
14 efforts that are going on here. It sounds like you are really  
15 heading in the right direction, so I will let you keep going on  
16 that.

17                 Is there anything further on the BI matter, Mr.  
18 Shortnacy?

19          *MR. SHORTNACY:* Nothing from BI, your Honor.

20          *THE COURT:* Thank you. Ms. Finken, anything further  
21 on the BI matter for the Plaintiffs?

22          *MS. FINKEN:* No, your Honor.

23          *THE COURT:* Mr. Shortnacy, I will excuse you. Thank  
24 you very much.

25                 Let me call up Mr. Sachse and/or Mr. Oot, or are you

1 soloing today, Mr. Sachse?

2 *MR. SACHSE:* I am soloing.

3 *THE COURT:* All right. It has been so long since I  
4 talked to you about this. I think I can remember what is going  
5 on in the case. What has happened since -- was it Tuesday we  
6 were together? What has happened in the last 48 hours, and  
7 where do we go from here?

8 *MR. SACHSE:* Well, quite a bit. I think we are  
9 definitely moving in the right direction. I could start with  
10 where we are on the MedTrack search or where we are on batch  
11 records, whatever you would prefer, Judge, and Ms. Finken.

12 *THE COURT:* Since we were just talking about batch  
13 records with BI, let's stay on that topic, because I do view  
14 them as separate inquiries. They are kind of moving in  
15 parallel, but separate tracks in my mind.

16 *MR. SACHSE:* That makes sense. I like the reference  
17 to tracks because I was thinking about the state of our batch  
18 records and it is a bit of planes, trains, and automobiles. We  
19 have produced some batch records in electronic form, we  
20 produced batch records in the old kind of dot matrix folded  
21 accordion paper form, and we now have a third form of batch  
22 records that we recently discovered in microfilm. So, really,  
23 we are kind of hitting the panoply of ways you can store  
24 information.

25 So, we are continuing to work to satisfy Plaintiffs'

1 request for exemplar batch records and I think that is  
2 underway. We have been providing some, and we are working with  
3 the site personnel to see what else we can get our hands on  
4 easily that would be exemplars for, you know, those facilities  
5 for the life of the product.

6 So, I think we are moving in the right direction  
7 there.

8 On SOPs, we have produced a number of additional SOPs  
9 we were able to find, and I think actually the ball is in the  
10 Plaintiffs' court. They were going to take a look at that to  
11 see if there was anything else that they were looking for or  
12 requesting. I think on that one we, frankly, are probably  
13 getting towards the end. I am not sure we are going to be able  
14 to find much more, but, of course, we will entertain any  
15 followup requests from the Plaintiffs on that.

16 On chromatograms, we were able to produce the visual  
17 chromatograms in electronic form, and the Plaintiffs asked us  
18 to see if we could essentially marry those or link those to  
19 individual batch records, and I think we have been able -- it  
20 took a little bit of wrangling to get there, but I think we  
21 were able to do that and we will be able to share that  
22 information with the Plaintiffs.

23 So, that is where we are on batch records.

24 *THE COURT:* Sort of the same question I asked Mr.  
25 Shortnacy: Do you have a target for when you think you will be

1 done producing batch records?

2           *MR. SACHSE:* Hard for me to say, because I think where  
3 we are is a little bit -- we really probably need to have a  
4 followup conversation with the Plaintiffs. They will take a  
5 look at what we have given them, and they will say, okay, this  
6 is sufficient, or we need a little bit more, we need some more  
7 information, and, of course, as your Honor knows, we have the  
8 ESI 30(b)(6), and one of the two kind of pillars of that is  
9 testimony -- or questions about the electronic batch records.

10           So, my guess is we might still be talking about batch  
11 records after that deposition, but, you know, I think that in  
12 terms of the historic going back and getting paper records from  
13 facilities, we are probably pretty close to the end at this  
14 point.

15           *THE COURT:* Thank you. Let me hear from Ms. Finken on  
16 the batch records issues.

17           *MS. FINKEN:* Your Honor, I agree with that. I think  
18 that we had an order in place that provided an extension until  
19 the end of next week that we had entered -- and correct me if I  
20 am wrong, Mr. Sachse -- I believe, to come to an agreement on  
21 this particular issue.

22           I don't have a dispute with what Mr. Sachse has said  
23 to the Court. We have been receiving certain information that  
24 we had requested. We are weeding through that, and we have  
25 followup questions, I am sure we will have another meet and

1 confer on that, likely next week when Ms. Luhana returns from  
2 her vacation. We have allowed her out this week. I suspect  
3 that we will have some followup conversation with Mr. Sachse  
4 next week on this particular issue.

5 *THE COURT:* Okay. Here is my concern globally for all  
6 of these topics, both for BI and GSK. Discovery closes less  
7 than six months from today. The Court has heard the Plaintiffs  
8 loud and clear in their repeated reminders that they need to  
9 get science sooner rather than later so they can prepare  
10 Daubert, experts, and things like that.

11 So, on the one hand, I am trying to help you there,  
12 Ms. Finken. On the other hand, you are playing very nicely and  
13 you haven't dug your heels in and they haven't dug their heels  
14 in yet, but everyone needs to understand, if the Plaintiffs  
15 come in September and say finally, we are fed up with these  
16 people and now we need more time, that is not going to be  
17 received very well because the time to dig your heels in is  
18 now.

19 The same thing, Mr. Sachse, the time to dig your heels  
20 in is now. We have been dancing with these issues for four or  
21 five months at this point, and as I said the other day, there  
22 is a point at which BI and GSK either have to say we are going  
23 to devote the resources and the time and the energy and just  
24 get them everything that they have asked for, or we are done.

25 Under Rule 26(g), we don't have to find every jog and

1 tittle and every piece of paper and every piece of microfiche.  
2 We are done, we have conducted a reasonable search. Then Ms.  
3 Finken will file whatever motion she is going to file, and the  
4 Court will rule, and this issue will land presumably in time  
5 for the Plaintiffs to do what they need to do.

6           You know, no one has asked me to set a firm deadline,  
7 but I am going to start setting some firm deadlines for this  
8 because I can't wait any more. I need this to come to closure.  
9 That is my concern here today.

10           On the batch records, if you say you want another bit  
11 of time to talk, because you seem to have opened a window and  
12 started to make some significant progress -- I won't make the  
13 obvious joke about the fact that Ms. Luhana has been gone the  
14 whole time that you have made this progress, so we will leave  
15 that alone. Nevertheless, I will give you some flexibility on  
16 that.

17           Ms. Finken and Mr. Sachse, what is your feeling on the  
18 GSK batch record issue? Do you want to just piggyback on the  
19 July 15th date with BI, with the understanding that I am going  
20 to set some firm deadlines on that date?

21           *MS. FINKEN:* I think that makes sense, your Honor.

22           *MR. SACHSE:* Yes, I think that is fine. I will be, at  
23 that time, quarantining in a London hotel, so I will have  
24 nothing better to do than talk about batch records. I agree  
25 with you, your Honor, I think we are fast approaching a point

1 where we all need to put this behind us one way or another, so  
2 we will be ready to do that.

3 *THE COURT:* Okay. I will set the batch records for  
4 both BI and GSK for hearing on July 15th, at one o'clock.

5 Let's turn to my other favorite topic. I don't even  
6 know how to categorize them. If I say clinical studies, Mr.  
7 Sachse says they are not clinical studies. If I say science  
8 studies, Ms. Finken says, no, they are more than that. So,  
9 let's agree on a term that we can all use here. Science  
10 studies, can we use that one?

11 *MS. FINKEN:* I refer to them as human clinical  
12 studies.

13 *THE COURT:* I can say the stuff that is in the PIER  
14 database, but not in the MedTrack database, because MedTrack is  
15 not a database, it is just a card catalog.

16 *MR. SACHSE:* Right.

17 *THE COURT:* We'll use Ms. Finken's word, human  
18 clinical trials. Where are we?

19 *MR. SACHSE:* Sure. I think the last time I reported  
20 we -- what we were doing was trying to -- a couple of different  
21 avenues, as you know. One was going back to the production to  
22 date to see if there were some of the entries on the MedTrack  
23 sheet that we have already produced. I think we are -- that is  
24 painstaking and sort of document by document. We found a  
25 couple more.

1           The bigger effort, excuse me, has been to cross  
2 reference the MedTrack sheet to PIER. We have been doing that.  
3 We now have roughly 750 -- I am told I should not call them  
4 boxes, but rather cartons, but I think of them as 750 boxes of  
5 documents from the PIER archive that we are currently  
6 evaluating, looking for reports that would match up with --  
7 clinical trial reports that would match up with the entries on  
8 the MedTrack sheet.

9           *THE COURT:* I'm sorry. What is the number you threw  
10 out? How many are you trying to pair up?

11           *MR. SACHSE:* There is a couple of different numbers  
12 here, to paraphrase Judge Rosenberg's opinion from yesterday.  
13 There are the 750 boxes that we have now pulled out of PIER,  
14 and we are going through those 750 boxes to look for the -- I  
15 think we are now under 450 entries on the MedTrack sheet that  
16 we still have not been able to locate.

17           Essentially, we are hoping that somewhere within the  
18 750 boxes, we are going to be able to draw that number down  
19 significantly from that MedTrack sheet.

20           *THE COURT:* Thank you. Please go on. I interrupted  
21 you, and I apologize.

22           *MR. SACHSE:* That is fine, I was sort of coming to the  
23 end. That is where we are, and we have just acquired those, or  
24 just been able to locate and pull out those boxes. That review  
25 is underway, and it will continue, and we are continuing to

1 roll out productions as we find materials.

2 I am told we have another production, it is a double  
3 digit production, but it is a low double digit production  
4 coming tomorrow, I think it is 11 studies that we were able to  
5 locate this week. I think the pace will pick up as we get  
6 through those 750 boxes one way or another. Either we are  
7 going to find a bunch of these or we are going to -- the well  
8 will run dry in terms of places we could reasonably look.

9 Then I think we will be, Judge, where you want us to  
10 be, which is approaching a point where we have to make a  
11 decision, is this it, is this a 26(g) situation, and then Ms.  
12 Finken will take whatever next steps she wants to take.

13 *THE COURT:* Okay. The 750 boxes, where are those  
14 physically? You said they are under review. Are they in the  
15 U.S. or are they in the U.K.?

16 *MR. SACHSE:* I believe there are some in the U.K. and  
17 some in the U.S., i think Most of them are in the U.S., but  
18 there is a couple -- I think it is something like 300 in the  
19 U.K., and 450 in the U.S., something like that.

20 *THE COURT:* You have a U.S. review team and a U.K.  
21 review team?

22 *MR. SACHSE:* That is my understanding. Essentially,  
23 they are going through doing a first cut triage to look for  
24 reports, again, that would be perhaps mapped to this MedTrack  
25 sheet, and then we are taking a closer look at those materials.

1           *THE COURT:* Not to put words in your mouth or tie you  
2 down definitively, but is it your general sense that, as you  
3 say, once we are done with these 750 boxes, we have exhausted  
4 our remedies here and we are probably prepared at that point to  
5 put our foot down?

6           *MR. SACHSE:* I think that is likely, I think that is  
7 likely, unless maybe, as we provide information to the  
8 Plaintiffs, or maybe as we are going through these boxes, it  
9 gives us a lead to look somewhere else. But sitting here  
10 today, we think that this is going to be the most likely source  
11 for, again, drawing that list of MedTrack sheet entries down.

12           *THE COURT:* Okay. Again -- okay. Let me hear from  
13 Ms. Finken.

14           One question, and I realize it has only been 48 hours.  
15 Have you all agreed upon a deposition date? I know I gave you  
16 until the end of July. Have you agreed on a date?

17           *MR. SACHSE:* We still need to talk about that. I am  
18 still waiting on the narrowed deposition topics, and we will  
19 work through that all next week. I think we are probably  
20 looking at closer to the end of the month.

21           We are still trying -- obviously, we need to see what  
22 the topics are specifically, although we have a pretty good  
23 sense from Tuesday, and we are still, frankly, trying to figure  
24 out what witness or witnesses we are going to want to use for  
25 this.

1           *THE COURT:* I did my best to cross-examine Ms. Finken  
2 on Tuesday and pin her down for you, Mr. Sachse.

3           *MR. SACHSE:* And I appreciated that. Thank you.

4           *THE COURT:* Here is what I am thinking. I will hear  
5 from Ms. Finken in a second. Here is what I am going to do,  
6 I'll tell you right up front.

7           I am going to set a deadline in this case, and what I  
8 would like to do is try to set it before the deposition occurs,  
9 because that way, at least when the deposition occurs both  
10 sides should be prepared -- if there are going to be questions  
11 about where did you look, why didn't you look, both sides will  
12 be prepared for that, both sides can be prepping the witness or  
13 prepping your questions for that.

14           Let me hear from Ms. Finken about that. Where are we?

15           *MS. FINKEN:* Your Honor, I agree one hundred percent  
16 with what you just said. I think that makes the most sense,  
17 and given that the deposition, if it is going to go forward  
18 toward the end of the month, and you can set a deadline that  
19 gives us some opportunity to review what is produced in the  
20 interim, I think that makes the most sense.

21           *THE COURT:* Okay. Here is what I am going to do: I'm  
22 going to set a deadline for three weeks from today, which I  
23 think is July 22nd, at 5:00 p.m. for GSK to either file -- I  
24 assume you filed objections so far to -- one of them -- I  
25 shouldn't even ask.

1           How many requests for production encompass this  
2 material that we are talking about, the human clinical trials?  
3 I am going to guess there is many.

4           *MR. SACHSE:* Sitting here right now, I couldn't tell  
5 you, your Honor, but yes, I am sure it is more than one.

6           *THE COURT:* I am sure. Ordinarily, in a normal case  
7 that didn't involve the entire universe here, we would say,  
8 well, it is request for production 17; I want the Defendants to  
9 file an amended response to request for production 17, and then  
10 the Plaintiffs can deal with that objection.

11           What I am going to order is, three weeks from today,  
12 July 22nd, by 5:00 p.m., GSK is to file amended objections, if  
13 they have them -- or amended responses to the requests for  
14 production that are germane to the human clinical trials, and  
15 that response can either be an objection, legal objection, it  
16 can be a we produced, we are done, you've got everything, there  
17 is nothing more to give. It can be we are invoking Rule 26(g),  
18 we have done what we are going to do, we are not going to do no  
19 more, or some combination thereof.

20           The idea would be at that point for GSK to say either  
21 you got what you are going to get and there isn't anything  
22 else, there is more, but we are not going to give it to you,  
23 there might be more, but we are not going to look for it.

24           At least that way the Plaintiffs will know which of  
25 those three forks in the road we happen to be on.

1           To the extent the Plaintiffs want to then try to flesh  
2 those out a little bit at the deposition, they can notify GSK,  
3 give GSK time to make sure they have their witness ready for  
4 that, and then the Plaintiffs can file whatever they want to  
5 file.

6           Let's be realistic. That is the not end of the game,  
7 because at that point, even if the Plaintiffs file a motion or  
8 invoke PTO 32, that doesn't preclude the parties from  
9 continuing to negotiate, from continuing to meet and confer,  
10 from continuing to exchange information and narrow the topics,  
11 but at least it will join the issue in a way that the Court can  
12 get its hands around it.

13           So, that is what I am going to order as to GSK, and  
14 that is what I am going to eventually order as to bot BI and  
15 GSK on the batch records, because I think procedurally that  
16 frames the issue for the Court in a way that is workable.

17           Ms. Finken.

18           *MS. FINKEN:* Your Honor, I have one question about  
19 that. Will that deadline apply to the production of the  
20 documents that are being collected from the 750 containers or  
21 cartons that Mr. Sachse referenced earlier?

22           *THE COURT:* Well, they are under, and have been under,  
23 an obligation and I believe have been continuing to operate as  
24 a rolling production, so they will roll them as they roll them.

25           Ideally, if they have identified everything -- that is

1 why I am giving them three weeks. If you have two review teams  
2 in two countries, and you have three weeks to go through 750  
3 boxes, that is 50 boxes -- they should be able to get through  
4 most of them, and hopefully find most of what they need to find  
5 and give you a lot, or tell you what is not there.

6 Do I expect them to have fully completed the  
7 production by that date? No. I expect them to be in a  
8 position to have -- they'll do what we always do in litigation,  
9 they are going to tell you what is left and what they have  
10 given you. I hope they will have -- what is the word we used  
11 in this case -- substantially completed their production by  
12 that date.

13 But I think it is more important to have something, a  
14 deadline, something in writing that you now, Ms. Finken, are  
15 fully advised of where they are, they have been forced to take  
16 a position, and then you can either challenge their position or  
17 not challenge their position.

18 Mr. Sachse, I am sorry for ruining your next three  
19 weeks of work, but I will hear from you as well.

20 *MR. SACHSE:* That is okay, your Honor, it is not going  
21 to be me, I am going to be busy getting ready for depositions.

22 A few things. One, I think probably I want to be done  
23 with this even more than Ms. Finken at this point. Let me say  
24 that for the record.

25 Second, just going back to when we were talking about

1 the upcoming deposition, I think we understand, you know, there  
2 is going to be the revised notice, it is supposed to be  
3 narrower, but one thing that you said, your Honor, that gave me  
4 pause was that this deposition, in part, will involve questions  
5 about where did you look, and to me, that is not an ESI  
6 deposition. That wasn't even in the original broader notice.

7 That, to me, really goes more to the attorneys, to our  
8 investigation and work product, and I don't think that that is  
9 appropriate for the ESI 30(b)(6). I just wanted to make clear  
10 that we are going to object to that.

11 *THE COURT:* I understand. Let me be more precise,  
12 because you are right, I was a little loose there in the way I  
13 phrased it. Clearly why you chose to look where you chose to  
14 look is work product generally speaking.

15 I submit that as sort of a catch phrase for if -- for  
16 example, if GSK's response is, we are invoking Rule 26(g)(1),  
17 we have engaged in a reasonable search and we are not going to  
18 look anywhere else, I would think it would be fair, not at a  
19 granular level, but at a fairly high level to simply say, well,  
20 where did you look? What was that reasonable search that you  
21 say you engaged in? Where did you look? Are you aware of any  
22 other -- did you affirmatively choose not to look at other  
23 places that you were aware might have had this information or  
24 are you simply saying we are not aware of anywhere else that  
25 might have information, but we can't certify that we have

1 looked in every piece of paper in the entire universe of the  
2 company?

3           That is what I mean when I say where did you look, not  
4 did you -- is there a database in Liechtenstein and you chose  
5 not to look at it? It is more at the higher level of, if you  
6 are going to take the position either we have produced  
7 everything that we have, or we've looked everywhere that we are  
8 willing to look, it is a logical question to say, well, are you  
9 aware of anywhere else that you are choosing not to look, or  
10 anywhere else that you think it might be that you didn't look?

11           How much deeper than that I would let them go, I don't  
12 know, but I don't think much deeper than that.

13           *MR. SACHSE:* The problem with that, though, your  
14 honor, is that the witnesses have to be prepared to talk about  
15 the systems, the mechanics of the systems, for example, what is  
16 MedTrack, what did MedTrack become, what happened to the  
17 information that was identified in the MedTrack.

18           To ask the followup question of, well, where did you  
19 search, or did you search database A or sheet B, or whatever,  
20 the only way these witnesses would get that information would  
21 be if they were witnesses on the legal team, or if the legal  
22 team provided that information to them, and that really pries  
23 into what is protected, which is our investigation.

24           *THE COURT:* You and I, I think, are talking past each  
25 other, Mr. Sachse. I am not suggesting that they are allowed

1 to ask, you know, why didn't you look there, but I think they  
2 are allowed to ask, like I said, to me what would be the  
3 logical question. If someone came to me and said we have  
4 produced everything we have and we have looked in every place  
5 that we know of, I don't know that I have any other followup  
6 questions to that.

7 But if they come to me and they say we are producing a  
8 lot, there might be other stuff out there, so we can't say for  
9 sure it isn't there, but we are not going to look for it  
10 because we think we have looked for enough, the logical  
11 question might be, well, where haven't you looked, not why  
12 didn't you look there, but where haven't you looked.

13 That is a factual question, that doesn't probe the  
14 thought processes of the lawyer. It is, I looked in the file  
15 cabinet on the second floor, but I didn't look in the file  
16 cabinet on the third floor. That seems to me to be factual.

17 Now, why didn't you look, and the answer is, well, the  
18 lawyers told us we didn't have to look on the third floor, that  
19 is probably over the line.

20 Look, this may all be hypothetical because when you  
21 serve whatever response you serve, the answers may be  
22 unambiguous and there may be no followup, because it may be we  
23 have looked everywhere, there ain't nowhere we didn't look, so  
24 there is no followup question.

25 *MR. SACHSE:* I guess just hearing this -- and I

1 appreciate, you know, how you are framing it, but as I think  
2 about this, again -- and I am thinking about the witness or  
3 witnesses -- they are not going to know the answers to those  
4 questions. They are going to have to be prepared on the  
5 answers to those questions, and to me, it seems that -- let's  
6 say just hypothetically, and I think it is probably a fair  
7 guess that we come to three weeks from now and we do say we  
8 have satisfied under 26(g).

9 Now, the Plaintiffs can take the deposition and they  
10 can talk about -- with the witness about MedTrack and what  
11 became of MedTrack and where the information identified in  
12 MedTrack went, you know, all of that.

13 But it seems to me that then the question of whether  
14 the Rule 26(g) -- you know, whether we did in fact comply with  
15 Rule 26(g) and conduct a reasonable search, that seems more to  
16 be about if and when there is a motion joined challenging that,  
17 and then you would turn to us and say -- you know, Ms. Finken  
18 would say here is the five places, and then you would turn and  
19 say, well, Mr. Sachse, did you search A, B, C, D, E.

20 It is something that I don't think should be handled  
21 through what is supposed to be a limited ESI deposition, fact  
22 deposition about the systems, the legacy systems, the current  
23 systems, etc.

24 *THE COURT:* Fair point, because I was thinking the  
25 same thing. Are we arguing over something that inevitably we

1 are going to have a hearing, and presumably it may not be me  
2 turning to you, it may be me saying to you, call a witness to  
3 testify to what is there, and what was looked for, and how easy  
4 would it have been to look there, and how hard would it have  
5 been to look there. Ms. Finken will have fun cross-examining  
6 them.

7 I hear you and your concerns are valid in that regard.  
8 It may just be one we have to put to the side for a second, and  
9 perhaps I have gotten ahead of myself here. Maybe we have to  
10 put to the side for a second whether -- maybe I will phrase it  
11 this way.

12 I think there may be at that deposition some areas of  
13 questioning Ms. Finken could probe into that might inform  
14 whether she chooses to file a motion challenging a Rule 26(g)  
15 certification, and perhaps that can be dealt with by  
16 deposition. Perhaps it can be dealt with as you have dealt  
17 with each other many times, through informal discussion,  
18 through letters, through emails, through declarations, and  
19 other things. That is sort of my point.

20 I think it would be to the benefit of everybody if --  
21 I agree with you. Let's be honest, GSK is never going to say,  
22 we have looked everywhere possible and we can conclusively and  
23 definitively exclude the possibility that no more studies  
24 exist. They are never going to say that. You would be  
25 committing malpractice if you let them say that.

1           MR. SACHSE: I agree.

2           THE COURT: So that is not going to happen.

3           At some point we are going to have an issue joined  
4 where you are going to say, we think we found it all, or we  
5 found a lot, and there might be other stuff out there, but  
6 either we are not going to look for it or we haven't been able  
7 to find it. Ms. Finken may want to -- if it is two studies of  
8 the margin, maybe she doesn't care. If it is 150 studies,  
9 maybe she does care, but she is going to want to join that  
10 issue.

11           I just think it is in the interest of everyone to kind  
12 of understand whether it is worth her while to join that issue  
13 and have you and the Court and the Plaintiffs expend the  
14 resources and the time to litigate that issue if it can be  
15 dealt with in a more simplistic manner. I guess that is where  
16 I want to be.

17           So, if it is helpful at the deposition to allow  
18 limited inquiry that would -- once she has your answers, would  
19 then allow the Plaintiffs to inform that decision, I would  
20 allow that. I agree with you, I am not going to let them get  
21 into why did Mr. Sachse tell you not to go look in the third  
22 file cabinet on the left and all that kind of stuff. So I hear  
23 you.

24           MR. SACHSE: I appreciate that guidance, and you have  
25 given me a lot to think about.

1 I agree. Look, at the end of the day, if we can  
2 figure out just how we can either resolve this or we can narrow  
3 the dispute, whether it is through the deposition, or whether  
4 it is through informal -- you know by now I am all about trying  
5 to find a practical solution. Let me think about this one and  
6 I will work with Ms. Finken on it.

7 *THE COURT:* Exactly. I think I got ahead of myself  
8 there maybe giving a little too definitive a ruling than I  
9 should have given. You and Ms. Finken work beautifully  
10 together, you manage to work out these things well together. I  
11 know you use the special master when you need her assistance  
12 sometimes.

13 So, I guess I -- I have given you my high level  
14 thoughts and my high level guidance on that, and I am confident  
15 you two can work through where we all want to be. Look,  
16 Ms. Finken doesn't want to waste her time and her clients' time  
17 and money having a hearing or chasing down studies if it really  
18 is they are just not there, or they are studies that are so  
19 tangential to the general causation question here that it is  
20 really not going to move the needle at all.

21 On the other hand, if you flip it around, if you are  
22 the one sitting there and hearing there is 150, or 200, or 400  
23 studies you don't have, you are a little more concerned that  
24 there that is something in there that is material to the case  
25 than if you are told there are five out of 700.

1           Again, maybe we will all know a lot more in three  
2 weeks when you file your response, when you have gone through  
3 the 750 boxes and Ms. Finken has a little more information.

4           I should probably stop talking because the more I  
5 talk, I probably make it more confusing for everybody.

6           Ms. Finken, let me turn to you. Have I made this  
7 guidance as clear as mud?

8           *MS. FINKEN:* Your Honor, I think we should just cut to  
9 the chase and you should call a company witness in and question  
10 them about where the studies are and we can really expedite the  
11 situation. That is my vote.

12           I hear you and I think that we are revising our  
13 notice, we will be serving it per the order that you issued the  
14 other day, and hopefully we will get some answers by the 22nd.

15           *THE COURT:* Just to be clear, I couldn't put this in  
16 my order because I try not to be that granular, but again, if  
17 you two can agree on it in a series of letters or emails, from  
18 my perspective -- you do what you want to do -- I don't know  
19 that I would require -- I am not requiring you to formally  
20 serve an amended notice. By agreement, if you sort of narrow  
21 the topics in the subpoena as written, I don't care. I will  
22 leave that to you two.

23           It may be that Mr. Sachse and his client would feel  
24 better if they got a formally served notice, and that is fine,  
25 too.

1           *MR. SACHSE:* I think it is probably going to end up  
2 being the springboard for some cross notices in Texas, and  
3 Tennessee, and maybe California.

4           *THE COURT:* So there is a good reason to do it that  
5 way. That's why I should stay out of it. You all live this 15  
6 hours a day, I only live it four to five hours a day, so I am  
7 way behind you.

8           Anything else we need to do on this topic, Ms. Finken?

9           *MS. FINKEN:* I don't think so, your Honor.

10          *THE COURT:* Mr. Sachse, anything further?

11          *MR. SACHSE:* Nothing from me, your Honor.

12          *THE COURT:* So, you are going to London to take depositions?  
13 I hope not to look through 750 boxes.

14          *MR. SACHSE:* I am going to London to defend  
15 depositions. I believe Mr. Watts will be joining me.

16          *THE COURT:* We have had a lengthy discussion about the  
17 interplay between the response and the deposition. I don't  
18 want the deposition to be delayed, I want the deposition to go  
19 forward no matter what. If it turns out that there is  
20 supplemental questions or other topics, or the need for further  
21 process, Ms. Finken and Mr. Sachse will address that  
22 separately, but the deposition that I ordered the other day  
23 needs to go forward in the timeframe that we set.

24          I am trying to schedule these other things to at least  
25 inform some of that.

1           Okay, thank you, Mr. Sachse. Thank you, Ms. Finken.  
2 Anything further from either side?

3           *MS. FINKEN:* I don't believe so, thank you, your  
4 Honor. Have a nice holiday weekend.

5           *THE COURT:* You all as well. I will see you back on  
6 July 15th, at one o'clock, if not before. Mr. Shortnacy, you  
7 as well. Anything further?

8           *MR. SHORTNACY:* Your Honor, I did want to make one  
9 point of clarification when we were talking about batch records  
10 before. BI continues to make productions of batch records,  
11 including sending out a production today, and we have worked  
12 with Plaintiffs on that schedule.

13           Further, and I think I explained before, because of  
14 the process of pulling the paper records and putting them into  
15 the scanning and doing the coding that has been done, those  
16 records are effectively all in the pipeline at this point. We  
17 are going to continue to produce those records, and I think, in  
18 our view, that sort of concludes that portion of PTO 63.

19           Hopefully that gives your Honor some reassurance that  
20 we are making some concrete progress.

21           With respect to the electronic sort of Venn diagram  
22 your Honor discussed at the last hearing, that is what we are  
23 talking about with Plaintiffs and really pushing with them to  
24 make specific requests, and hopefully we will get there. If  
25 not, your Honor has set a deadline to make that issue joined,

1 as you said, and we appreciate that.

2           *THE COURT:* Look, I commend all of you, I know you are  
3 working hard. I do hear through the special master, on the  
4 occasions that I speak with her, that you all are working  
5 really hard and trying to make accommodations and work through  
6 these things.

7           Mr. Shortnacy, same thing for you, at some point -- I  
8 think under the rule you have to file an amended response, you  
9 have to do your Rule 26(g) certification at some point. If the  
10 answer is, look, we have found everything that we believe  
11 exists, it is in the pipeline, you don't have it yet -- from  
12 living with Ms. Finken the last two months, I think at some  
13 level that is equally important to her as actually getting the  
14 documents, simply knowing this is what is coming, this is all  
15 that is coming and I should have it within X number of days or  
16 weeks.

17           I applaud all of you and encourage all of you to  
18 continue to have that kind of a dialogue, which I know you have  
19 been having, but that is equally important.

20           If there is nothing else from all the parties, I will  
21 excuse everyone, and thank you and wish everyone a happy  
22 holiday, and I will see you whenever.

23           Have a good day, everybody.

24           *MS. FINKEN:* Thank you, your Honor.

25           *(Thereupon, the hearing was concluded.)*

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I certify that the foregoing is a correct transcript  
from the record of proceedings in the above matter.

Date: July 2, 2021

/s/ Pauline A. Stipes, Official Federal Reporter

Signature of Court Reporter

<p><b>MR. SACHSE:</b> [23] 6/1 6/7 6/15 8/1 10/21 11/15 11/18 12/10 12/21 13/15 13/21 14/5 14/16 15/2 16/3 18/19 20/12 21/24 23/25 24/23 26/25 27/10 27/13</p> <p><b>MR. SHORTNACY:</b> [6] 2/13 3/5 3/25 4/19 5/18 28/7</p> <p><b>MS. FINKEN:</b> [15] 2/9 2/22 4/21 5/3 5/11 5/21 8/16 10/20 11/10 15/14 17/17 26/7 27/8 28/2 29/23</p> <p><b>THE COURT:</b> [43]</p>	<p><b>7</b></p> <p>700 [1] 25/25 750 [12] 12/3 12/4 12/13 12/14 12/18 13/6 13/13 14/3 17/20 18/2 26/3 27/13 772.467.2337 [1] 1/23</p>	<p>apologize [1] 12/21 apparently [1] 4/3 appear [1] 2/5 applaud [1] 29/17 applies [1] 3/17 apply [1] 17/19 appreciate [5] 3/7 5/13 22/1 24/24 29/1 appreciated [1] 15/3 approaching [3] 3/19 10/25 13/10 appropriate [1] 19/9 Arch [1] 1/15 archive [1] 12/5 are [129] areas [1] 23/12 arguing [1] 22/25 around [2] 17/12 25/21 as [29] 3/11 4/2 4/3 6/14 8/7 9/21 11/11 11/21 12/4 13/1 13/5 14/2 14/7 14/8 17/13 17/14 17/23 17/24 18/19 19/15 22/1 23/16 26/7 26/7 26/21 28/5 28/7 29/1 29/13 ask [5] 2/7 15/25 20/18 21/1 21/2 asked [4] 7/17 7/24 9/24 10/6 assistance [1] 25/11 assume [1] 15/24 Atlanta [1] 1/19 attorneys [1] 19/7 automobiles [1] 6/18 avenues [1] 11/21 aware [4] 19/21 19/23 19/24 20/9</p>
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