

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF FLORIDA  
3 WEST PALM BEACH DIVISION

4 CASE NO. 20-md-02924-ROSENBERG

5 **IN RE: ZANTAC (RANITIDINE)** .  
6 **PRODUCTS LIABILITY** . West Palm Beach, FL  
7 **LITIGATION.** . July 15, 2021  
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10 STATUS CONFERENCE (through Zoom)  
11 BEFORE THE HONORABLE BRUCE REINHART  
12 UNITED STATES MAGISTRATE JUDGE

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Official Court Reporter:   Pauline A. Stipes  
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1           *THE COURT:* Good afternoon, everyone, this is  
2 20-md-2924, In re: Zantac (Ranitidine) Product Liability  
3 Litigation. We are here today for a discovery status  
4 conference. I don't think it is going to be a lengthy hearing,  
5 but we are here today for a discovery status report on two  
6 matters.

7           We will start with the -- we have the BI lawyers up,  
8 so we will start with the BI matters first. Let me have  
9 counsel make their appearances, please.

10          Counsel for the Plaintiff.

11          *MS. LUHANA:* Good afternoon, Judge, Roopal Luhana for  
12 the Plaintiffs.

13          *THE COURT:* Good afternoon. And for Boehringer  
14 Ingelheim.

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

17          *THE COURT:* Good afternoon to both of you.

18          We were together two weeks ago, and I just wanted to  
19 get an update. I said at that hearing I was going to try to  
20 set a deadline based upon the developments that have happened  
21 since then, but just to circle back and make sure that I am  
22 remembering this correctly, this started out as a discussion  
23 about materials that were in Mexico at the Promeco facility.

24          My understanding is BI has now, hopefully, been able  
25 to access everything they need to, and they are just making a

1 mass production of all the materials that they are recovering  
2 there. All may be a little too strong, but they are making a  
3 virtually complete production of whatever is in the batch  
4 records that are in the Promeco facility.

5 I understand the Plaintiffs have told them they don't  
6 need all that stuff, and that the Plaintiffs have given some  
7 alternative suggestions for not producing everything. I  
8 understand BI's position is, no, while we have access and we  
9 have been asked for it all, we are going to give you it all. I  
10 understand the Plaintiffs' position is, we don't want it all,  
11 and please don't come back later and claim that because you  
12 have given us a bunch of stuff that we don't want, it is now  
13 disproportionate to give us the stuff that we really do want.

14 I understand those are the positions on both sides and  
15 no one is compromising on any of their views on those two  
16 positions. That, to me, is not an issue here today, but I did  
17 want to say it on the record, that I have heard both of you, I  
18 understand those positions, and no one is compromising on  
19 either of those positions in any way today.

20 What is on the agenda today is my understanding that  
21 there were some documents that were within -- this was our Venn  
22 diagram discussion a few weeks ago. There are some  
23 manufacturing related documents that are in electronic format,  
24 some of which may fall within the circle that is the batch  
25 records, some which may have fallen outside the circle that is

1 the batch records, but are nevertheless manufacturing documents  
2 in electronic format.

3 What the parties had been doing over the last month or  
4 so is trying to identify that universe of electronic documents  
5 and which of those documents the Plaintiffs want,  
6 prioritization of the production of those documents, and to the  
7 extent that BI has an objection to producing those documents  
8 based upon burden or other concerns, that at least we are all  
9 pointing to the same things and trying to move the ball  
10 forward.

11 So, my understanding at our last hearing was you all  
12 had started moving in that direction and I just wanted to get a  
13 quick update as to whether that process is continuing and what  
14 your best estimate is as to how quickly we can reach the  
15 inflection point where everybody sort of agrees that the  
16 Plaintiffs know what are there, the Plaintiffs have asked for  
17 what they want, and BI has either said we are going to give it  
18 to you, or we are not going to give it to you.

19 That's a long lead-in but, Mr. Shortnacy, let me turn  
20 to you and have you respond, please.

21 MR. SHORTNACY: Thank you, your Honor. Michael  
22 Shortnacy speaking.

23 You are right, and to your point about the paper  
24 records, your Honor, we are making what we believe to be,  
25 hopefully, the final production of those records to make it

1 complete at the end of this month, with another one going out  
2 tomorrow in fact.

3 Right, with respect to the Venn diagram, I think your  
4 Honor has said it correctly. In fact, the batch records  
5 themselves are also partly how you narrow into what is there  
6 and what the Plaintiffs are asking for.

7 So, what we have been pushing for, what we have been  
8 working with the Plaintiffs and the special master is to really  
9 have the Plaintiffs provide us with a narrow and specific ask  
10 pointing to specific records that will allow us, BI, to be able  
11 to respond and to say, if you are looking for these  
12 investigation records, now we are talking about a specific  
13 thing that we can respond to.

14 I think that is really the critical component for us,  
15 is being specific, and also that once you identify the what,  
16 you really can then get into the why and whether or not the  
17 information can be provided, for example, by a question like  
18 was there even this equipment used at the facility. That may  
19 answer and resolve questions.

20 Those are the kinds of conversations that are having  
21 with Plaintiffs, and again, I think from our perspective,  
22 pushing at all times to be as narrow and specific as possible  
23 so we can respond, identify what is being asked for  
24 specifically so that we can ask the next question, which is:  
25 What is the burden and what is it going to show and is the

1 juice worth the squeeze from our perspective?

2           *THE COURT:* I understand that is the dialogue from  
3 your perspective. I understand as well, and Ms. Luhana made  
4 this point the last time we were all together, it is hard to  
5 say what we want if we don't know what you have. I understand  
6 that is a circular argument.

7           I broke the log jam and I told the Plaintiffs to go  
8 first, understanding that there is going to be some ebb and  
9 flow there and that just because they didn't ask the precisely  
10 right question or push the exactly precise right button, BI is  
11 acting in good faith and if it is clear this is what they are  
12 asking for and there is some record out there that they haven't  
13 directly asked for, but it is really responsive to their ask,  
14 we are going to tell them.

15           Understanding that is the flow, is that process going  
16 forward, are requests being made, are disclosures being made,  
17 are the Plaintiffs -- I will turn to Ms. Luhana in a second.

18           But from BI's perspective, are you starting to at  
19 least get a feel for what they are asking for such that you can  
20 start to make your evaluation of is the juice worth the  
21 squeeze, are we going to agree to produce this, et cetera? Do  
22 you feel that process is moving?

23           *MR. SHORTNACY:* Yes. This is Michael Shortnacy  
24 speaking again.

25           I do think the process is moving. We have engaged

1 with the Plaintiffs, we have pointed them to certain documents,  
2 they have provided questions to us, we have iterated on that  
3 process at least twice. Our mission is to try to make it as  
4 specific as possible, and to your point, your Honor, it is in  
5 our interest to help frame that question because, you know, we  
6 are interested in moving this along and having it reach the  
7 inflection point your Honor is talking about.

8 We certainly are willing to say, you know, if you  
9 didn't say this magic word, we think you are thinking this. We  
10 pointed Plaintiffs to certain Bates numbers of reports that  
11 contain records that we think they are interested in. So, I do  
12 think that process is working and we encourage it to be as  
13 focused and narrow as it possibly can.

14 *THE COURT:* I agree. I will come back to you in a  
15 second. Let me turn to Ms. Luhana. You have been very  
16 patient, I appreciate that. Let me let you respond to anything  
17 that has been said.

18 *MS. LUHANA:* Sure, thank you, Judge. The Plaintiffs  
19 have worked to narrow the scope of our request, we got those  
20 over to BI. BI, in turn, on July 5th, as Mr. Shortnacy  
21 mentioned, did provide us with a list of information. So, they  
22 provided us with about 50 spreadsheets from TrackWise, and that  
23 was covering about 2,500 batches of Zantac, and it was all of  
24 their out of trend, out of spec testing results, and they also  
25 provided a list of their annual product reviews for the time



1       they have had Zantac.

2               So, the spreadsheets are voluminous, they contain  
3 thousands upon thousands of cells of data, and sometimes it is  
4 in paragraph form. So, what we have done, once we received it  
5 on July 5th, we sent it to our team in Puerto Rico to do all  
6 the translations. So, it has been a huge undertaking and our  
7 team just got those documents back to us yesterday morning.

8               So, now we are going through them, sifting through the  
9 data and ascertaining exactly which batches we want to focus on  
10 and what testing and data we want. That is the next step, the  
11 ball is in our court to get that over to BI, and we plan to  
12 schedule another meet and confer shortly to go through some of  
13 those spreadsheets to narrow our request.

14               *THE COURT:* Great, that is very productive. I  
15 appreciate hearing that.

16               Let me ask you, Ms. Luhana, what is your sense of  
17 timing on all of this? As I said at the last hearing, I just  
18 want to set a deadline. I think deadlines are helpful,  
19 understanding, let's be clear, what a deadline in this context  
20 is going to drive. It would be similar to what I have ordered  
21 to GSK, which is a date by which BI has to say we are giving  
22 you -- we have completed our search, you have everything, we  
23 have completed our search, it is coming and here is when it is  
24 going to come by, or we have done all the searching we are  
25 required to do and we are not going to look any more.

1           At which point the Plaintiffs would then react either  
2 by doing nothing, or by requesting a PTO 32 to try to --  
3 essentially file a Motion to Compel. So, that would mean there  
4 would be a window of time after whatever the date -- the  
5 deadline would be in BI's written response, during which we  
6 would schedule the PTO 32, and the parties could certainly  
7 continue to negotiate and continue to meet and confer and  
8 perhaps resolve issues or narrow issues.

9           So, the reason I lay that out is, I want the parties  
10 to be aware that the Court understands that that sort of a  
11 deadline is a triggering point, but not an ending point to  
12 discussion. So, when I ask you how much time do you need for  
13 me to set for that deadline, I want it to be in context.

14           Ms. Luhana, what do you think is a good period of time  
15 to allow this process to continue on to a point where you feel  
16 like BI should be able to give you an answer and also give you  
17 an answer in a way that this process can come to an end such  
18 that the Plaintiffs have the documents that they are going to  
19 get, with enough time to do what they need to do this fall?

20           MS. LUHANA: That's a very good question, Judge, and I  
21 think a fair timeline would be sometime at the end of August,  
22 because we will be able to run through the data, work on a  
23 proposal, we should be able to work with BI on these meet and  
24 confers to get some of these answers. Bear in mind that we  
25 have the 30(b)(6) coming up soon.

1           So, we are going to ascertain where the data is  
2   housed, what exactly is maintained, where it is maintained, how  
3   accessible it is, how easily it can be retrieved and what  
4   format. We will have all those answers to those questions so  
5   we will be able to fairly assess where we think we should push  
6   on some data versus other data. So, we will be well informed  
7   to make that decision, make that call by the end of August.

8           *THE COURT:* Okay. Mr. Shortnacy, I will allow you to  
9   respond.

10          *MR. SHORTNACY:* Thank you, your Honor. One point of  
11   clarification. The spreadsheets that we pointed Plaintiffs to  
12   because they asked a specific question and the response was  
13   these sheets were, in fact, produced in March, and they have  
14   been out there a long time. So, I just want to clarify that  
15   that has been sitting and what we are hoping is happening on  
16   the Plaintiffs' side is that things are not sitting like that  
17   and that we can try to move this process along. That is the  
18   first point.

19          As to the second point, for the 30(b)(6), I think that  
20   is something to flag for your Honor. That is another example  
21   where we have topics, as Ms. Luhana suggested, that are  
22   squarely about sort of electronically source testing  
23   information that is, in part, part of the batch records, that  
24   is true.

25          We've asked for as many written questions in advance

1 as sort of narrow and focusing that we can do, as your Honor  
2 suggested with GSK and their issue about making a 30(b)(6) ESI  
3 deposition be efficient and allow for preparation. So, we have  
4 asked for that and hope that that will happen.

5 Also, they have asked topics on 13 different systems,  
6 and so we are working with Plaintiffs to try to narrow those  
7 requests as well because, as your Honor can appreciate, 13  
8 different systems have 13 different people, and so on and so  
9 forth.

10 I agree that the long-range plan of end of August  
11 makes sense. I only mention those things because we do want to  
12 keep anchoring back to the what and the why, why is this  
13 necessary and can it be focused, because I think that informs  
14 the burden analysis which we are all here to really, at the end  
15 of the day, make.

16 *THE COURT:* Okay, I hear you.

17 A couple of things. First of all, I am not going to  
18 fault the Plaintiffs necessarily that in the truly mountains of  
19 discovery that they have gotten in this case they didn't notice  
20 these spreadsheets back in March. There has been a lot of  
21 moving parts here and I know everybody is scrambling. Maybe at  
22 some point in the future that becomes a relevant fact in some  
23 analysis that I have to do, but at least as I sit here today, I  
24 don't find that particularly problematic or troubling to me.

25 In terms of the 30(b)(6) depositions, as I said the

1 last time, I think there is a push and a pull there.

2 The more focused information that the Plaintiffs can  
3 give to the Defendants about what the topics are going to be --  
4 as I said the other time, if they would just give you their  
5 list of questions, you can definitely prepare people. I don't  
6 expect them to actually do that, but I also expect them not to  
7 just show up and say here is a very high-level topic, we want  
8 to ask you about manufacturing.

9 So, I appreciate that you all are working through that  
10 and going through that process. Look, if other issues come up  
11 in the interim, I will address those.

12 If the parties both agree that you think late August  
13 is the right time to land this plane, at least preliminarily  
14 land this plane, I will trust you. You are closer to this than  
15 I am.

16 Looking at my calendar, I am looking at Friday,  
17 August 20th, that is toward the end of the month. That way we  
18 don't ruin Labor Day weekend for anybody and those sorts of  
19 things. That is close to 45 days away. Or would you prefer  
20 even later, like -- immediately before Labor Day, like  
21 Thursday, September 2nd, or Friday, September 3rd?

22 Ms. Luhana, do you have a preference?

23 *MS. LUHANA:* Why don't we shoot for September 2nd.

24 *THE COURT:* Mr. Shortnacy, does that date work for  
25 you?

1           MR. SHORTNACY: Yes, that works for us, your Honor.

2           THE COURT: Okay. You have already seen the order I  
3 did on GSK. My expectation is I will cut and paste, so it will  
4 be the same directive as to that. Great.

5           Do you feel there would be value in having a scheduled  
6 status check-in sometime between now and September 2nd on this  
7 topic, or is it better for me to just leave it to you two, and  
8 if you need me you can always either formally request a PTO 32,  
9 or informally through the special master say we have some  
10 topics we would like to talk about, getting guidance from the  
11 Court would be helpful, and we can do that on an ad hoc basis.

12           Ms. Luhana, what is your preference?

13           MS. LUHANA: I think if we can informally reach out to  
14 the special master and to when we need your intervention, that  
15 would make sense to do it that way.

16           THE COURT: All right. Mr. Shortnacy.

17           MR. SHORTNACY: I agree, your Honor, and that's right.  
18 If we feel like we need to exercise PTO 32, we have that  
19 availability, and otherwise can reach informally out to you  
20 through the special master, that works, and I appreciate that,  
21 your Honor.

22           THE COURT: Very well. So, I am not going to schedule  
23 another interim status check-in. I appreciate where you all  
24 have gotten to. It sounds to me like you have gotten to the  
25 point where we need to be where there is some transparency for

1 the Plaintiffs, they sort of know what is there. There is  
2 transparency for BI, they are starting to get a focus on what  
3 is being asked for. Everybody is iteratively focusing more and  
4 more. If you tell me you need about 45 days to finish that  
5 process, I have no problem with that.

6 That's all I had on this topic. Ms. Luhana, anything  
7 else relating to these issues that you wanted to raise today?

8 *MS. LUHANA:* I just wanted to raise one issue. In  
9 terms of the 30(b)(6) notice, we have provided very specific  
10 detailed topics to address to BI, and we have requested that,  
11 to the extent they have questions about those topics, to  
12 address those with us, but I think we have gotten detailed  
13 enough in terms of the topics that we intend to cover.

14 *THE COURT:* Again, I am not seeing it, and you know my  
15 practice is I generally don't rule on that ahead of time.  
16 Emphasis on the word "generally". I am not saying it never  
17 happens, but generally speaking. Again, I trust you all have a  
18 good relationship. I know the special master is available and  
19 I trust that you will be as focused as you need to be.

20 Look, if what happens is, BI shows up for the  
21 deposition, Plaintiffs ask certain questions, the BI witness --  
22 I do allow BI to instruct the witness not to answer a question  
23 at that time, or perhaps the witness says, I am not prepared to  
24 answer that, and if then we have to address after the fact  
25 whether the witness should have been able to answer the

1 question or should have had to answer the question, that is  
2 what I get paid for, and I will adjudicate that on a developed  
3 record after the fact.

4 So, you all will get as close as you can get. I don't  
5 expect we will get through an entire 30(b)(6) deposition in  
6 this case without some disagreement about, well, you should  
7 have been able to answer that, well, no, we shouldn't have.  
8 That's okay, that is not -- my expectation is not perfection.  
9 My expectation is what you are doing, so I appreciate it very  
10 much. Thank you very much, Ms. Luhana.

11 Mr. Shortnacy, anything further?

12 *MR. SHORTNACY:* Nothing further for us, your Honor.

13 *THE COURT:* All right. Thank you. Then I will excuse  
14 you folks relating to the BI issue and I will ask the parties  
15 who are speaking on behalf of the GSK issue to turn on their  
16 cameras, please.

17 Good afternoon, Ms. Power and Ms. Boldt.

18 If I could ask counsel for the Plaintiffs to enter her  
19 appearance, please.

20 *MS. BOLDT:* Paige Boldt on behalf of Plaintiffs. Good  
21 afternoon, your Honor.

22 *THE COURT:* Good afternoon, Ms. Boldt. On behalf of  
23 GSK.

24 *MS. POWER:* Caroline Power of Dechert on behalf of  
25 GSK. Good afternoon, your Honor.



1           *THE COURT:* Good afternoon to both of you, too.

2           Again, to just circle up and to make sure we are all  
3 looking at the same target here, last time we were together GSK  
4 reported that they had identified approximately 750 boxes of  
5 what they think -- if the human clinical trials exist anywhere,  
6 they are going to be somewhere in those 750 boxes most likely.  
7 Again, there are no absolutes in this case.

8           They were going through those boxes, and I set a  
9 deadline for an inflection point to either produce what you are  
10 going to produce, or say you are not going to produce any more.

11           Ms. Power, if you could bring me up to date on how you  
12 are doing in the process of going through the boxes and if  
13 there is any further discussion or any other topics that need  
14 to be addressed.

15           *MS. POWER:* Yes, your Honor. I think the high level  
16 take-away here is that the process is ongoing. We have boxes  
17 collected in both the U.S. and the U.K., those are being done  
18 with a first-level review to determine if any responsive  
19 documents are worth scanning, and then a second-level review  
20 before production, and that process has been going on on a  
21 rolling basis. We have been making productions of additional  
22 responsive studies.

23           We anticipate that the complete step one and step two  
24 process will be done, or close to done enough to have that  
25 inflection point that your Honor mentioned by the end of the

1 month.

2 And, your Honor, you previously set a request for a  
3 report on July 22nd. Based on the current status of scanning,  
4 we would request a five-day extension to that, that we could  
5 provide a report on July 27th. Your Honor, this is the day  
6 before the scheduled GSK ESI 30(b)(6) deposition.

7 *THE COURT:* Refresh me just so you and I are talking  
8 about the same thing, Ms. Power. What is it that you -- you  
9 say a report on -- did I order a report or is that the date I  
10 ordered by which GSK had to amend its responses to the request  
11 for production?

12 *MS. POWER:* I will have to get back to you on the  
13 details of that, but I understand that by the 22nd, we were  
14 going to make a final disclosure of where we stood, whether we  
15 believed we had done all that we could do, and have that  
16 inflection point to determine whether or not there is a dispute  
17 remaining.

18 *THE COURT:* Hold on just one second. I think what I  
19 had ordered, Ms. Power, was -- the procedural format for you to  
20 provide that notice was to file amended responses to the  
21 request for production which conformed to the local rules and  
22 to my standing discovery order in terms of format and which  
23 contained a Rule 26(g) certification.

24 So, if what you are asking is for an additional five  
25 days to provide that certification and that response -- am I

1 correct that is the ask?

2 MS. POWER: I believe so.

3 THE COURT: I see Mr. Sachse is hiding on the call, I  
4 know he is over in England.

5 MS. POWER: I am here with him. He will jump in if he  
6 thinks he needs to.

7 THE COURT: I didn't mean to call you out, Mr. Sachse.  
8 Ms. Power is doing a great job and I hope you are both enjoying  
9 being in England.

10 Mr. Sachse, I just want to make sure, there was  
11 nothing else I had ordered you to do by the 22nd that I am not  
12 remembering, is there?

13 MR. SACHSE: No, your Honor. This is, for the record,  
14 Will Sachse.

15 Yes, you are correct that we are to update or amend  
16 our responses just so that we can crystalize, clarify whether  
17 or not there is a dispute remaining.

18 THE COURT: All right. That's fine. Let me turn to  
19 Ms. Boldt.

20 I'm sorry, Ms. Power, had you completed your report?

21 MS. POWER: Your Honor, the only other thing I wanted  
22 to mention was the upcoming ESI deposition and how we are  
23 continuing to produce the exemplar batch records as requested  
24 by Plaintiffs.

25 THE COURT: Very well. Let me turn to Ms. Boldt.

1           *MS. BOLDT:* Good afternoon, your Honor.

2           *THE COURT:* Good afternoon.

3           *MS. BOLDT:* As far as we were aware, there were no  
4 issues and, frankly, we have a deposition, as Ms. Power  
5 mentioned, on the 28th, so we would object to an extension for  
6 these productions when that deposition is a 30(b)(6) on ESI  
7 issues, and while we are doing ongoing meet and confers, our  
8 understanding was that things were moving smoothly for next  
9 week's clinical production deadline.

10           *THE COURT:* Let me turn back to Ms. Power. Perhaps we  
11 can pull this apart into two pieces.

12           There is a difference, I think, between when are they  
13 going to get the documents and when are you going to file  
14 whatever certification that you have now given them, whatever  
15 it is.

16           So, is your request to just have additional time to  
17 make the certification and they are still going to get the  
18 documents by the 22nd, or is your request to have additional  
19 time to actually produce the documents?

20           You are on mute, I apologize, Ms. Power.

21           *MS. POWER:* (Inaudible) is the point at which to make  
22 the assessment. As I mentioned, there are collection  
23 professionals who are pulling those boxes off of shelves and  
24 going through them in order to assess whether they are  
25 responsive or not. What volume of potentially responsive

1 documents comes out of that process will inform the time  
2 necessary to get it processed for electronic production in the  
3 case.

4 It is correct, your Honor, that we are hoping to have  
5 all of that production done -- excuse me, to have our  
6 certification and that they would have the production  
7 beforehand.

8 *THE COURT:* Yes, I am looking at my order here. For  
9 the record, it is at Docket Entry 3735, I don't think I have  
10 ever had to say that before, on the docket. It says: GSK  
11 shall substantially complete its production by the 22nd.

12 Again, I am not necessarily sure what the disagreement  
13 is, Ms. Power. If you are saying you are engaging in a rolling  
14 production, you are going to continue to engage in that rolling  
15 production, there will be some materials that will be produced  
16 after the 22nd, but before the 27th, but maybe it is not  
17 substantial -- again, if you could clarify that for me.

18 *MS. POWER:* If we have the five extra days it would  
19 allow us to make a more accurate representation to Plaintiffs  
20 about how complete the production is. We do intend for it to  
21 be substantially complete, but so that they can have an  
22 accurate view on what we are seeing coming out of that PIER  
23 process and what can be expected over the next few weeks.

24 *THE COURT:* Okay. So, Ms. Boldt, if I am  
25 understanding, the request, and what I would consider doing, is

1 giving them additional time to make the certification, with the  
2 understanding that whatever production schedule we are on is  
3 going to be the production schedule that we are on and that is  
4 not going to be modified.

5 It was always anticipated there could be some  
6 additional production after July 22nd, but I am not extending  
7 the July 22nd date for the substantial completion, I would just  
8 be giving them additional time to formalize that through their  
9 certification.

10 Does that inform your decision any better, Ms. Boldt,  
11 or do you want to confer with your colleagues if you weren't  
12 expecting this question?

13 *MS. BOLDT:* This is the first time we are hearing of  
14 this extension request, even though we spoke with them this  
15 morning regarding this production as well.

16 *MS. FINKEN:* Your Honor, it is Tracy Finken for the  
17 record. May I jump in for one moment?

18 *THE COURT:* Sure.

19 *MS. FINKEN:* Thank you. Your Honor, as Ms. Boldt just  
20 indicated, we had not been advised of the request for an  
21 extension despite having spoken directly before this  
22 conference, so it came as a bit of a surprise to hear that.

23 Given the July 28th ESI deposition that we have on  
24 this specific topic, we would just request that we get those  
25 responses well enough in advance of that deposition so that we

1 can meet and confer, we can discuss it, analyze it, and be  
2 prepared for the deposition. So, we would actually object to  
3 that request for an extension and had not had a chance to  
4 discuss it with them ahead of time.

5 *THE COURT:* Okay. Let me turn back to Ms. Power to  
6 give her the last word.

7 *MS. POWER:* Your Honor, if I understand Plaintiffs  
8 correctly, that they would like more time to discuss this with  
9 us, we are certainly open to that. I am not prepared to  
10 withdraw our request today, but we can have those conversations  
11 and circle back to the Court if additional conversations would  
12 be helpful.

13 *THE COURT:* Here is what I am going to do. I am going  
14 to deny that request without prejudice at this time. You all  
15 can continue to talk and if the parties reach an agreement that  
16 additional time or an additional process would be helpful, I am  
17 happy to entertain that. File whatever formal motion you need  
18 to file. If the parties need to have another status conference  
19 to talk to me directly, I am happy to do that as well.

20 At least at this point, I am not prepared to extend  
21 the deadline, but I will give you the chance to meet and  
22 confer, and if at that point GSK wants to request that, I will  
23 hear you on that.

24 Anything else, then, Ms. Power, that we need to do  
25 this afternoon?

1 MS. POWER: Nothing from me, your Honor.

2 THE COURT: What time is it there in England?

3 MS. POWER: It's 6:30 here.

4 THE COURT: I hope Mr. Sachse will take you out to a  
5 nice dinner.

6 MS. POWER: We are actually in quarantine, so it will  
7 be a nice dinner in.

8 THE COURT: Okay. I'm sorry. Ms. Boldt, anything  
9 further that we need to take up from the Plaintiffs'  
10 perspective this afternoon?

11 MS. BOLDT: No, your Honor, thank you.

12 THE COURT: All right. I thank you all. I will  
13 excuse everybody, wish everyone a one day belated happy  
14 Bastille Day and a good weekend. I will wait to hear from you  
15 all as you need me.

16 Thank you, everybody. We will be in recess.

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

18 \* \* \*

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

21

22 Date:

23 /s/ Pauline A. Stipes, Official Federal Reporter

24 Signature of Court Reporter

25



<b>MR. SACHSE:</b> [1] 19/12 <b>MR. SHORTNACY:</b> [7] 3/14 5/20 7/22 11/9 13/25 14/16 16/11 <b>MS. BOLDT:</b> [5] 16/19 19/25 20/2 22/12 24/10 <b>MS. FINKEN:</b> [2] 22/15 22/18 <b>MS. LUHANA:</b> [6] 3/10 8/17 10/19 13/22 14/12 15/7 <b>MS. POWER:</b> [12] 16/23 17/14 18/11 19/1 19/4 19/20 20/20 21/17 23/6 23/25 24/2 24/5 <b>THE COURT:</b> [33]	<b>4600</b> [1] 1/23 <b>5</b> <b>50</b> [1] 8/22 <b>5726</b> [1] 1/18 <b>5th</b> [2] 8/20 9/5 <b>6</b> <b>600</b> [1] 1/15 <b>6:30</b> [1] 24/3 <b>7</b> <b>750</b> [2] 17/4 17/6 <b>772.467.2337</b> [1] 2/7 <b>78249</b> [1] 1/19 <b>8</b> <b>888-480-1113</b> [1] 1/16 <b>A</b> <b>able</b> [8] 3/24 6/10 10/16 10/22 10/23 11/5 15/25 16/7 <b>about</b> [16] 3/23 5/23 6/12 8/7 8/22 8/23 11/22 12/2 13/3 13/8 14/10 15/4 15/11 16/6 18/8 21/20 <b>above</b> [1] 24/20 <b>absolutes</b> [1] 17/7 <b>access</b> [2] 3/25 4/8 <b>accessible</b> [1] 11/3 <b>accurate</b> [2] 21/19 21/22 <b>accurate representation</b> [1] 21/19 <b>acting</b> [1] 7/11 <b>actually</b> [4] 13/6 20/19 23/2 24/6 <b>ad</b> [1] 14/11 <b>additional</b> [10] 17/21 18/24 20/16 20/18 22/1 22/6 22/8 23/11 23/16 23/16 <b>address</b> [4] 13/11 15/10 15/12 15/24 <b>addressed</b> [1] 17/14 <b>adjudicate</b> [1] 16/2 <b>advance</b> [2] 11/25 22/25 <b>advised</b> [1] 22/20 <b>after</b> [5] 10/4 15/24 16/3 21/16 22/6 <b>afternoon</b> [14] 3/1 3/11 3/13 3/15 3/17 16/17 16/21 16/22 16/25 17/1 20/1 20/2 23/25 24/10 <b>again</b> [8] 6/21 7/24 15/14 15/17 17/2 17/7 21/12 21/17 <b>agenda</b> [1] 4/20 <b>ago</b> [2] 3/18 4/22 <b>agree</b> [5] 7/21 8/14 12/10 13/12 14/17 <b>agreement</b> [1] 23/15 <b>agrees</b> [1] 5/15 <b>ahead</b> [2] 15/15 23/4 <b>all</b> [32] <b>allow</b> [6] 6/10 10/15 11/8 12/3 15/22 21/19 <b>along</b> [2] 8/6 11/17 <b>already</b> [1] 14/2 <b>also</b> [6] 6/5 6/15 8/24 10/16 12/5 13/6	<b>alternative</b> [1] 4/7 <b>always</b> [2] 14/8 22/5 <b>am</b> [21] 3/21 12/17 13/15 13/16 14/22 15/14 15/16 15/23 18/25 19/5 19/11 21/8 21/12 21/24 22/6 23/9 23/13 23/13 23/16 23/19 23/20 <b>amend</b> [2] 18/10 19/15 <b>amended</b> [1] 18/20 <b>analysis</b> [2] 12/14 12/23 <b>analyze</b> [1] 23/1 <b>Anapol</b> [1] 1/11 <b>anchoring</b> [1] 12/12 <b>and that</b> [1] 8/22 <b>annual</b> [1] 8/25 <b>another</b> [5] 6/1 9/12 11/20 14/23 23/18 <b>answer</b> [8] 6/19 10/16 10/17 15/22 15/24 15/25 16/1 16/7 <b>answers</b> [2] 10/24 11/4 <b>anticipate</b> [1] 17/23 <b>anticipated</b> [1] 22/5 <b>Antonio</b> [1] 1/19 <b>any</b> [8] 4/15 4/19 9/25 17/10 17/13 17/13 17/18 22/10 <b>anybody</b> [1] 13/18 <b>anything</b> [5] 8/16 15/6 16/11 23/24 24/8 <b>anywhere</b> [1] 17/5 <b>apart</b> [1] 20/11 <b>apologize</b> [1] 20/20 <b>appearance</b> [1] 16/19 <b>appearances</b> [1] 3/9 <b>appreciate</b> [7] 8/16 9/15 12/7 13/9 14/20 14/23 16/9 <b>approximately</b> [1] 17/4 <b>Arch</b> [1] 2/3 <b>are</b> [86] <b>argument</b> [1] 7/6 <b>as</b> [36] <b>ascertain</b> [1] 11/1 <b>ascertaining</b> [1] 9/9 <b>ask</b> [11] 6/9 6/24 7/9 7/13 9/16 10/12 13/8 15/21 16/14 16/18 19/1 <b>asked</b> [9] 4/9 5/16 6/23 7/13 11/12 11/25 12/4 12/5 15/3 <b>asking</b> [4] 6/6 7/12 7/19 18/24 <b>assess</b> [2] 11/5 20/24 <b>assessment</b> [1] 20/22 <b>Atlanta</b> [1] 1/22 <b>August</b> [5] 10/21 11/7 12/10 13/12 13/17 <b>August 20th</b> [1] 13/17 <b>availability</b> [1] 14/19 <b>available</b> [1] 15/18 <b>Avenue</b> [1] 1/15 <b>aware</b> [2] 10/10 20/3 <b>away</b> [2] 13/19 17/16
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