

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.** . January 6, 2021  
8 .

9 DISCOVERY STATUS CONFERENCE (through Zoom)  
10 BEFORE THE HONORABLE ROBIN L. ROSENBERG  
11 UNITED STATES DISTRICT JUDGE and  
12 THE HONORABLE BRUCE REINHART  
13 UNITED STATES MAGISTRATE JUDGE

14 FOR THE PLAINTIFFS: **TRACY A. FINKEN, ESQ.**  
15 Anapol Weiss  
16 One Logan Square  
17 130 N. 18th Street Suite 1600  
18 Philadelphia, PA 19103  
19 215-735-1130  
20  
21 **ADAM PULASKI, ESQ.**  
22 Pulaski Kherkher PLLC  
23 2925 Richmond Avenue Suite 1725  
24 Houston, TX 77098  
25 713-664-4555  
  
**MICHAEL L. McGLAMRY, ESQ.**  
Pope McGlamry P.C.  
3391 Peachtree Road NE  
Suite 300  
Atlanta, GA 30326  
404-523-7706  
  
**ROBERT C. GILBERT, ESQ.**  
Kopelowitz Ostrow Ferguson  
Weiselberg Gilbert  
2800 Ponce de Leon Boulevard  
Suite 1100  
Miami, FL 33134  
305-384-7270

**PAIGE N. BOLDT, ESQ.**

Watts Guerra LLP  
5726 W. Hausman Road  
Suite 119  
San Antonio, TX 78249  
210-448-0500

**CONLEE WHITELEY, ESQ.**

Kanner & Whiteley LLC  
701 Camp Street  
New Orleans, LA 70130  
504-524-5777

**ROOPAL P. LUHANA, ESQ.**

Chaffin Luhana LLP  
600 Third Avenue 12th Floor  
New York, NY 10016  
888-480-1113

**MARLENE J. GOLDENBERG, ESQ.**

Goldenberg Law, PLLC  
800 LaSalle Avenue  
Suite 2150  
Minneapolis, MN 55402  
612-238-3150

**MARK J. DEARMAN, ESQ.**

Robbins Geller Rudman & Dowd, LLP  
120 E. Palmetto Park Road  
Suite 500  
Boca Raton, FL 33432  
561-750-3000

**FOR THE DEFENDANTS: WILL SACHSE, ESQ.**

Dechert LLP  
Cira Centre  
2929 Arch Street  
**Philadelphia, PA 19104**  
215-994-4000

**PAIGE H. SHARPE, ESQ.**

Arnold & Porter Kaye Scholer LLP  
601 Massachusetts Avenue NW  
Washington, D.C. 20001  
202-942-5000

**ANAND AGNESHWAR, ESQ.**

Arnold & Porter Kaye Scholer LLP  
250 West 55th Street  
New York, NY 10019  
212-836-8011

**ANDREW D. KAPLAN, ESQ.**

Crowell & Morning LLP  
1001 Pennsylvania Avenue NW  
Washington, D.C. 20004  
202-624-2500

**THOMAS J. YOO, ESQ.**

Holland & Knight LLP  
400 Hope Street 8th Floor  
Los Angeles, CA 90071  
213-896-2400

**SARAH JOHNSTON, ESQ.**

Barnes & Thornburg LLP  
2029 Century Park East  
Suite 300  
Los Angeles, CA 90067  
310-284-3798

Official Court Reporter: Pauline A. Stipes  
HON. ROBIN L. ROSENBERG  
Ft. Pierce/West Palm Beach, Fl  
772.467.2337

1           THE COURT: Okay, good afternoon, everyone.

2           I think somebody may have their video on. If  
3 everybody, at this point, can turn their video off, we'll just  
4 assure ourselves that those who are supposed to come on will  
5 come on at the right time.

6           So, welcome. We are here in the MDL Zantac matter.

7           I want to first say hello to everyone and wish  
8 everybody a happy new year, and I hope that everyone is doing  
9 well.

10           This is the first discovery conference that we have  
11 scheduled in the Zantac MDL. You may recall at the last status  
12 conference I had discussed, with the new phase of the case  
13 entering the new year, with it almost being a year since the  
14 inception of the MDL -- on or about February 6th, we had the  
15 transfer of the case to create the MDL here in our court.

16           And with the first round of Motions to Dismiss and  
17 orders, except for one order, having been issued and with  
18 discovery well under way, but much more to come, we had  
19 thought, that is "we", counsel and the Court, that it may be a  
20 productive new beginning of this phase of the litigation to try  
21 having discovery conferences in addition to the case management  
22 conferences that we already had been having.

23           And that we would do these discovery conferences every  
24 month, this being the first, and that we would also continue  
25 with status conferences every month, but we would stagger them

1 so that, in essence, the parties and counsel will have the  
2 opportunity to interact and be with the Court approximately  
3 every two weeks. We would have a discovery conference, and  
4 then in two weeks a status conference, two weeks later would be  
5 the discovery conference, which would be one month from the  
6 last status conference.

7 So, that is what we are going to do today, is to try  
8 our first discovery status conference, see how it goes and see  
9 if it is productive for the parties, for counsel, and for the  
10 Court. Som thank you for being here and for preparing for  
11 today's conference.

12 You can see that Judge Reinhart is with me, and he  
13 will be actively participating, and for the most part, we will  
14 both try to preside over the status conferences each and every  
15 time that they are scheduled.

16 I do want to remind everyone about the purpose -- at  
17 least the vision that the Court had, in conjunction with lead  
18 counsel, as to the purpose for the status conferences, the  
19 discovery status conferences, and that was really for  
20 informational purposes. In other words, it was an opportunity  
21 for the parties, through counsel, to apprise the Court as to  
22 how discovery is going, what things you are working on, what  
23 things are on the horizon, what issues you have just perhaps  
24 completed, and to allow the Court to remain knowledgeable,  
25 engaged, and aware on a more detailed level during this phase

1 of this litigation as to how discovery is going.

2 So, I view it as something of an informational sharing  
3 process where you are sharing information with the Court as to  
4 how discovery is going.

5 What these discovery conferences are not, they are not  
6 dispute resolution conferences, if you will. In other words,  
7 the intention is not to take discrete discovery matters that  
8 are giving rise to disagreement between the parties, disputes  
9 or on the brink of a dispute, and present it to the Court and  
10 seek relief from the Court. That is not the purpose of the  
11 discovery conference.

12 In fact, we have a pretrial order in place, PTO 32,  
13 that deals with the discovery process, that deals with dispute  
14 resolution, that provides the parties with, I hope you would  
15 agree, all avenues available to seek relief from the Court when  
16 disputes arise and the parties are unable to work those  
17 disputes out.

18 I always like to comment and commend the parties on  
19 how well they have done to date in working matters out. There  
20 have only been an isolated number of disputes that have  
21 actually risen to the level of Court intervention and that is a  
22 tribute to the work that each and every one of you are  
23 undertaking daily in working with one another to try to resolve  
24 your disputes before you need Court intervention.

25 But I have always made it clear, and I continue to

1 want to reiterate that, that if you need Court intervention  
2 because a dispute cannot be resolved, I and Judge Reinhart are  
3 here to resolve those disputes and to render relief where  
4 appropriate given the nature of the dispute. That is not what  
5 the conferences are for, so I just wanted to reiterate that.

6         There was some desire, I think, on the part of counsel  
7 as to guidance in how to prepare for the conferences, and what  
8 kind of information would be helpful for the Court in  
9 anticipation of the conferences, so let me try to give as much  
10 clarity as I can, but I want everyone to recognize that this is  
11 a work in progress, and if we feel that something did not go as  
12 well as maybe we would have liked in either preparing for or in  
13 undertaking the conference, that I am open to hearing  
14 suggestions as to how we might change, or differ, or improve  
15 the process so that we are constantly growing and making this  
16 as efficient and effective and user friendly an MDL as it can  
17 possibly be.

18         With that being said, based on this first discovery  
19 conference and the submissions that have been presented to the  
20 Court, what I would say would be helpful to the Court is, about  
21 a week or so in advance of the discovery conference, give or  
22 take a couple of days, I think it would be helpful for the  
23 parties, lead counsel, to sit down with Special Master Dodge  
24 and create an agenda so we all know what we are going to be  
25 discussing at the discovery conference.

1           Hopefully there will be an agreement as to what that  
2 agenda is because, after all, it is for informational purpose.  
3 It is not about what is going to be disputed or disagreed,  
4 where there is disagreement, and that, I think, could lend  
5 itself perhaps less to seeing eye to eye on what the agenda  
6 should be, but really it is what issues do you want to inform  
7 the Court about.

8           Hopefully there can be a meeting of the minds, if you  
9 will, as to what that agenda would look like topically, so you  
10 come up with your four or five points, as you did today, and I  
11 appreciate that very much, Judge Reinhart does as well, so it  
12 gave us some indication of what we are going to be hearing from  
13 and learning from the parties today.

14           Once the agenda has been set, a week, five days in  
15 advance, I would ask that one day before the status conference  
16 that, just as you did this time, that there be a two-page  
17 status report, a two-page status report, and this way they will  
18 look somewhat alike insofar as at least the topics will be the  
19 same because you will have agreed on the agenda, and you can  
20 give us a brief summary in those two pages as to each topic  
21 that will be on the agenda.

22           It can be single spaced. I know the agenda that was  
23 submitted -- the status conference reports that were submitted  
24 this time to the Zantac email were single spaced, and that's  
25 fine. They can be single spaced, two pages. That was a



1 perfect number of pages. There shouldn't really be any need  
2 for attachments.

3           They should go to the Zantac email. It will be  
4 something that Judge Reinhart and I will review so that we are  
5 prepared, so that we have an idea of what you would like to put  
6 on the agenda. Ultimately, Judge Reinhart and I will decide  
7 what goes on the agenda.

8           There may be things you didn't include on the  
9 agenda that we may want to inquire about, that we may be  
10 interested in hearing about, and there may be things that you  
11 have put on the agenda that we may not think is the appropriate  
12 time at this particular discovery conference, for example, to  
13 address.

14           We may not necessarily always agree with the items  
15 that you have put on, although I suspect mostly we will, and in  
16 any event, receiving that status report one day, 24 hours in  
17 advance of the status conference. So, work backwards to  
18 whatever hour the status conference is set, and 24 hours in  
19 advance, please just submit it to the Zantac email, and it will  
20 be for our review and understanding of what you would like to  
21 discuss.

22           These aren't dispute resolution motions, if you will,  
23 or filings seeking relief, so they won't be filed on the court  
24 docket, but rather, they will be a working document for Judge  
25 Reinhart and I to consider and determine what ultimately should

1 be addressed at the discovery conference.

2 I lastly wanted to say that, in looking at the  
3 calendar, if we were to stick to the schedule that we had  
4 anticipated at the end of last year at our last status  
5 conference, we would be looking to have another status  
6 conference, in other words, a case management conference on or  
7 about the week of January 18th, so I would ask that you  
8 coordinate dates with the special master.

9 If you have already done so, maybe update those dates.  
10 Perhaps you gave her dates before the end of the year and some  
11 things have changed on your calendar. I would like to set a  
12 day that, obviously, all, or as many lead counsel, or  
13 participants, or those who will be actively presenting are  
14 available. So, always try to set a date that encompasses  
15 availability of most, if not all, of the participating counsel.

16 Also, our collective calendars should reflect that the  
17 next status conference should be on or about the week of  
18 February 1st. If you can take a look at your calendars, again  
19 coordinate with Special Master Dodge as to available dates and  
20 times, this way at least we can get the next case management  
21 conference and the next status -- discovery status conference  
22 set.

23 There is talk about whether we want to try to set  
24 those a few months out. I am amenable to that, so if you want  
25 to take a few months at a time and look at February, and --

1 January, February, and March, that would be fine. If you want  
2 to go further out than that and can put some dates together,  
3 then at least we could pencil in some dates beyond even the  
4 next three months so we know where we are going, and this way  
5 we can all plan accordingly.

6 I think those were all of the points that I wanted to  
7 address as the first topic in terms of my opening remarks, as  
8 well as hopefully providing some guidance as to our vision of  
9 the discovery conferences, at least this being the first one,  
10 so the vision for this first one, and how best to prepare in  
11 getting the Court materials that would put the Court in the  
12 best position to be prepared to hear from you.

13 With that, let me turn it over to Judge Reinhart, who  
14 will take the next topic on the agenda, that being the topic  
15 involving brand discovery.

16 *MAGISTRATE JUDGE REINHART:* Thank you, Judge.

17 Welcome. Let me ask Ms. Luhana, Mr. McGlamry --

18 *MR. GILBERT:* Excuse me, Judge Reinhart, you appear to  
19 be on mute.

20 *MAGISTRATE JUDGE REINHART:* Let me try it that way.

21 Thank you, Mr. Gilbert, for alerting me. Good  
22 afternoon, everyone.

23 Let me welcome Ms. Luhana, Mr. McGlamry, and Ms.  
24 Finken for the Plaintiffs and Mr. Sachse for the Defense to  
25 turn on their cameras. Good afternoon, everyone.

1 I know we are here to talk about some topics relating  
2 to the brands. After I have heard from Mr. Sachse, if either  
3 Ms. Sharpe, Mr. Friedman, or Ms. Horne have anything they want  
4 to add, you certainly don't have to, but I welcome you to add  
5 any comments you would like to make after Mr. Sachse has  
6 concluded his remarks.

7 The first topic I would like to take up and give you  
8 an opportunity to brief Judge Rosenberg and me about is the  
9 status of the noncustodial and custodial productions pursuant  
10 to PTO 47. I know there were some deadlines toward the end of  
11 December for substantial production. I am going to anticipate  
12 that the parties may disagree as to what "substantial" meant in  
13 that setting and that is what we are going to hear, but let me  
14 invite the parties to give us a report on that.

15 Let me start with Ms. Luhana.

16 MS. LUHANA: Good afternoon, your Honor, and  
17 Magistrate Reinhart. Roopal Luhana of Chaffin Luhana for the  
18 Plaintiffs. Happy new year to you both and good to see you.

19 Judges, as the Plaintiffs stated in our status report  
20 to the Court, we are concerned about the limited productions we  
21 have received from the brands to date.

22 As the Court is aware, the brands have represented  
23 that they have substantially completed the first tranche of  
24 their custodial productions. The brands have collectively  
25 produced only 126,000 documents for a total of 68 custodians

1 across the brands. Moreover, three out of the four brands have  
2 represented that they have completed their noncustodial  
3 productions per PTO 47.

4 The completed noncustodial productions for Sanofi, BI,  
5 and Pfizer total approximately 101,000 documents. Those  
6 101,000 documents are intended to include all relevant  
7 documents related to regulatory, adverse events,  
8 pharmacovigilance, SOPs, manufacturing, storage, transport,  
9 quality assurance, and marketing, to name some of the areas  
10 addressed in Plaintiffs' discovery.

11 However, the quantity of the production speaks  
12 volumes. In the Xarelto MDL, Judge Fallon required the  
13 Defendants produce at least 5 million pages per month per Court  
14 Order.

15 Here, the litigation has been pending for almost one  
16 year and collectively the brands have produced under four  
17 million pages of documents for a product that was on the market  
18 for 37 years and subject to essentially a worldwide recall.

19 We believe these productions, based on these numbers  
20 alone, are likely deficient.

21 As we stated in our report, however, 75,000 documents  
22 were produced in the last two weeks, and so it is going to take  
23 the Plaintiffs time to review and assess the deficiencies and  
24 subsequently address them with the Defendants and then update  
25 the Court accordingly.

1 I would like now to turn to the specific details of  
2 the productions to date for each brand. Let's start with  
3 Sanofi.

4 Sanofi has produced approximately 33,000 custodial  
5 documents for the 16 tranche one custodians and about 13,000  
6 noncustodial documents. Judges, in identifying the appropriate  
7 custodians to designate we met and conferred with Sanofi who  
8 had disclosed the names of employees it found to be highly  
9 relevant. We relied on these representations in selecting  
10 custodians for tranche one. Five of those custodians  
11 identified as highly relevant have less than 600 documents  
12 each.

13 For example, Robert Bruce, director of analytical  
14 research and development, who is a current employee and joined  
15 in 1999, and worked on Zantac's stability testing, has less  
16 than 550 documents.

17 Yu Shou (phon), head of research and development U.S.  
18 for consumer health care, who joined in 2017, also a current  
19 employee and was involved in the market withdrawal related  
20 Zantac testing, has less than 500 documents. This is highly  
21 unusual considering Sanofi is the last Zantac manufacturer from  
22 2017 until 2019, and should have larger productions for these  
23 custodians.

24 Let's now turn to GSK. GSK has produced approximately  
25 5800 custodial documents for 13 tranche one custodians and

1 about 87,000 noncustodial documents. The parties agreed that  
2 GSK would produce a total of 38 custodial files, with 30  
3 custodial files by December 31st, and the remaining eight would  
4 be produced in January 2021.

5 GSK hasn't complied with PTO 47. It was required to  
6 produce 30 custodial files by December 31st, and they produced  
7 13 custodial files.

8 Moreover, for the custodial files GSK has produced, it  
9 is difficult to imagine how they are substantially complete.  
10 Ten of the 13 tranche one custodians each have less than 300  
11 documents. GSK, in our meet and confers, also identified  
12 highly relevant custodians for us, but a review of these  
13 custodial files for these highly relevant custodians raises  
14 questions.

15 For example, Graham Carey, identified as a highly  
16 relevant employee by GSK, also a current employee who worked on  
17 Zantac in 2015, and then again in 2019 to the present, has only  
18 118 custodial documents.

19 The same with Effie Connor (phon), another  
20 employee identified by GSK as a highly relevant employee, who  
21 worked on Zantac from 2014 to present, has 260 documents in her  
22 custodial file.

23 The same with Giuseppe Wheelan (phon), another GSK  
24 identified highly relevant employee, who worked on Zantac from  
25 2016 to present, has a mere 18 documents in his custodial file,

1 and the list goes on to identify custodial files that simply  
2 seem incomplete.

3           Next I want to turn to BI. BI has produced  
4 approximately 24,000 custodial documents for the 24 tranche one  
5 custodians, and approximately 78,000 noncustodial documents.  
6 BI's custodial production for the 24 custodians include about  
7 15 custodians with less than 600 documents produced in their  
8 custodial files.

9           Similar to the other brands, we engaged in meet and  
10 confers where BI identified highly relevant custodians for us,  
11 including Mark Blake, the executive director of drug safety,  
12 who is a current employee and was identified as a highly  
13 relevant employee, has 210 documents in his custodial file.

14           Phillip Brammel (phon), another employee identified by  
15 BI as highly relevant, who is a senior director and a current  
16 employee, has only 95 documents in his custodial file.

17           Janet Mensey (phon), another employee identified as  
18 highly relevant, who is the director of quality assurance and  
19 compliance and is a current employee, has 16 documents in her  
20 custodial file.

21           Based on these numbers and the importance of these  
22 custodians, who are all current employees, we don't understand  
23 how BI can represent these productions are substantially  
24 complete for PTO 47.

25           Lastly, Pfizer. Pfizer has produced approximately



1 63,000 custodial files for the 15 tranche one custodians and  
2 about 10,000 noncustodial documents. Almost 40 percent of the  
3 custodial documents produced are attributable to one custodian,  
4 with at least six custodians having less than 900 documents  
5 each.

6 Although Pfizer's last involvement with Zantac was in  
7 2006, it has produced more custodial documents than the amount  
8 of custodial documents produced by GSK, BI, and Sanofi  
9 combined. We simply don't understand how this is the case.

10 Judges, as I raised in the last conference, based on  
11 our experience in similar litigations, there should be millions  
12 and millions of documents of responsive discovery produced and  
13 we're not seeing that here.

14 I want to remind the Court again that OpenText, our  
15 document production vendor, informed us that in a typical case  
16 one custodian's custodial file for two years would typically  
17 consist of 30,000 emails, with a total of 50,000 documents for  
18 their custodial file, and Plaintiffs are not seeing these  
19 numbers here.

20 In conclusion, we wanted to provide the Court with a  
21 status update on productions per PTO 47, we will follow up with  
22 the brands regarding the productions to date after we have had  
23 an opportunity to assess them and then followup with the Court.  
24 To the extent Plaintiffs seek any type of relief, we will  
25 follow the protocol as set forth in PTO 32.

1 Thank you.

2 *MAGISTRATE JUDGE REINHART:* Thank you, Ms. Luhana.

3 Let me turn to Mr. Sachse and allow you to respond.

4 *MR. SACHSE:* Thank you, your Honor. Will Sachse on  
5 behalf of the brand Defendants and also on behalf of GSK.

6 First, Judge Rosenberg and Judge Reinhart, I do want  
7 to wish you a happy new year to you and your staff. I also  
8 want to thank you, Judge Rosenberg, at the outset for the  
9 guidance that you gave us today about the vision for these  
10 conferences. It was quite helpful and we will be happy, of  
11 course, to work with Special Master Dodge and with counsel to  
12 hopefully accomplish the vision that you have set out.

13 So, let me start with just a couple of observations  
14 generally, and then if my colleagues want to chime in with  
15 their specific responses, I am happy to cede the floor.

16 I just want to start by saying that I am very proud,  
17 certainly, of my team who worked incredibly hard to try to meet  
18 the deadlines of PTO 47, and on behalf of GSK, we almost got  
19 there, we didn't quite. We have a couple more documents that  
20 are in review now that we expect to be getting out early -- end  
21 of this week, early next week.

22 I think all of the brands really did work incredibly  
23 hard to meet the substantial completion deadline of  
24 December 31st, and I know Pfizer and BI have met that. Sanofi  
25 and GSK, we've met that with respect to electronic documents,

1 and I think, as I just said, we have some additional custodial  
2 files, GSK has some additional custodial files, paper  
3 documents, and I believe Sanofi does as well, that we are  
4 hoping to get out the door in relatively short order.

5 The other important thing here, and I really took  
6 Judge Rosenberg's guidance to heart at the last case management  
7 conference, communication is really key here. And we did,  
8 "we", GSK, did tell the Plaintiffs before the holidays that we  
9 thought we were not going to quite make it, but that we  
10 expected to be able to complete our custodial productions by  
11 the first or second week of January. We remain on track to do  
12 that.

13 I think that in terms of -- if you want to call that  
14 substantial completion, I think that is a pretty good job given  
15 the task we had in front of us.

16 Now I just want to turn to this concern that I hear  
17 from Ms. Luhana about the size of these productions.

18 First of all, to the extent there is any suggestion  
19 that any of us have done something wrong in terms of  
20 withholding documents or not, you know, trying to comply to the  
21 best of our ability with the deadline and to produce documents,  
22 I just categorically reject that. We have all been working  
23 hard and working in compliance with this Court's orders and in  
24 compliance with our obligations under the rules.

25 I think that Ms. Luhana's complaints may be really

1 just a matter of perspective because what we heard was a litany  
2 of the number of documents produced by each Defendant, but  
3 also, I think what was kind of embedded in there was a quick  
4 passing reference to the number of pages, and collectively the  
5 brands have produced approximately four million pages of  
6 documents.

7 This constitutes documents that relate to the entire  
8 40-year history of this product, and it -- the documents that  
9 are included in these productions are not just emails, not just  
10 one-off memos, but there are also sort of core database  
11 documents. Again, it matters how you count.

12 For example, we, GSK, have produced a database readout  
13 from our safety database. What this does is, it essentially  
14 gives the Plaintiffs information about each instance where a --  
15 what is called an adverse event, a cancer adverse event was  
16 reported to the company. We gave that readout to the  
17 Plaintiffs. I am sure they count that as one document, but  
18 that has 600 entries in it.

19 There are other, quote, single documents that other  
20 Defendants have provided that might have thousands and  
21 thousands and thousands of individual entries, call logs,  
22 things like that.

23 So I think, again, it is a matter of perspective in  
24 terms of the information that the Plaintiffs are getting.

25 What we hear is, we just think these numbers don't

1 make sense, they don't add up. We have heard reference to  
2 Xarelto, I think repeatedly, but this is not Xarelto, this is  
3 Zantac. This is a different product, it had a lengthy, lengthy  
4 history, and you have to take into account that lengthy history  
5 doesn't necessarily translate into there should be more  
6 documents.

7 To the contrary, I think you have to look at how each  
8 brand Defendant is situated and I think that explains to some  
9 degree what we are seeing in terms of these productions. For  
10 example, Ms. Luhana mentioned Pfizer. Pfizer stopped selling  
11 this product in 2005. Boehringer Ingelheim, they had this  
12 product for a little more than a decade, but they sold their  
13 entire consumer health care business.

14 Is it surprising to see this number of documents for a  
15 Boehringer Ingelheim or a Pfizer? No, I don't think it is.

16 For Sanofi, we know that Sanofi only held this product  
17 for a couple of years before the recall.

18 So, again, the number of documents or the number of  
19 pages that we are seeing I don't think is surprising.

20 And then finally for GSK, for my client, GSK stopped  
21 actively promoting this product -- let me back up.

22 GSK has held the NDA, the license essentially, for  
23 this product since the early '80's, but GSK stopped promoting  
24 the product, advertising the product in the early 2000's. The  
25 market share declined thereafter and actually GSK discontinued

1 distributing the product in the U.S. in 2018.

2           Given that history, it is not surprising that GSK  
3 doesn't have a significant amount of recent documents relating  
4 to Zantac.

5           So, when I hear about current custodians who have only  
6 a few hundred pages of documents, that, to me, is not at all  
7 surprising because these people, although they are absolutely  
8 central to the current -- you know, the recall, the voluntary  
9 recall and the investigation, they have only had involvement  
10 with Zantac for a couple of years.

11           So, I think the other thing to keep in mind is the age  
12 of this product kind of cuts both ways. What we hear from the  
13 Plaintiffs is a four year history means there should be tens or  
14 hundreds of millions of pages of documents, and based on our  
15 investigation, that is simply not true.

16           I can give you a good example. We heard a lot about  
17 the GSK custodians and where we are in the custodial  
18 productions. The historic custodians who are overwhelmingly, I  
19 think with maybe one or two exceptions, the former employees  
20 who are custodians, are long gone from the scene.

21           And so, when we first talked to the Plaintiffs about  
22 custodians, and they gave us a list of roughly 25 names they  
23 were interested in, we gave them a list of 25 names that we  
24 thought were probably the people to focus on, essentially the  
25 Plaintiff said, well, why don't we just look at everybody. We

1 didn't like that because we thought that that was a lot of  
2 custodians.

3 We said, let's -- we'll go and take a quick look to  
4 see if there are even documents that might relate to these  
5 custodians because some of them left the company in 1985 or  
6 1987, and the Plaintiffs agreed. The Plaintiffs understood  
7 when we said we'll look for custodial files, for these  
8 custodians we are not talking about emails, we are not talking  
9 about massive files, we are talking about, if we are lucky, we  
10 get maybe a box worth of materials that we can look through,  
11 and of that box, how much relates to Zantac.

12 So, we did that process, and after that process we  
13 ended up with -- I think we agreed, and as Ms. Luhana reported,  
14 we ended up with about 38 custodians total. After further  
15 investigation, after actually going to the warehouses when we  
16 could and pulling the boxes and opening them up and seeing what  
17 was in there, it turned out that only 26 of the 38 custodians  
18 have any documents to review and produce -- or to produce that  
19 are relevant.

20 So, we have been doing that and, of course, we have  
21 been slowed down by COVID, much like Sanofi has been slowed  
22 down by COVID.

23 It is not at all surprising, when you are looking at a  
24 file for somebody who left the company 25, 30, 35 years ago,  
25 that there aren't going to be that many documents left that

1 relate to Zantac.

2 And so, I think that this is not surprising. I really  
3 don't think it should be surprising to the Plaintiffs since we  
4 had this discussion last year when we talked about custodial  
5 files, and I think that we have all been doing our best to find  
6 responsive -- find and produce responsive documents. We have  
7 done that, and we are ready to keep moving.

8 For GSK, we have -- of course, our deadline for  
9 noncustodial production is March 15th, and we intend to meet  
10 that. In the meantime, we are gearing up and getting ready for  
11 a series of depositions.

12 So, unless you have questions about that, I am happy  
13 to turn it over to my colleagues if they want to add some  
14 flavor for their own clients.

15 *MAGISTRATE JUDGE REINHART:* Thank you, Mr. Sachse.  
16 You certainly don't have to, but Ms. Sharpe, or Mr. Friedman,  
17 or Ms. Horne, if any of you would like to be heard, just  
18 activate your camera and I will call on you.

19 Ms. Sharpe on behalf of Sanofi. Good afternoon.

20 *MS. SHARPE:* Good afternoon, your Honor. Good  
21 afternoon to Judge Rosenberg as well. It is a pleasure to be  
22 before you both again.

23 Let me apologize if you hear any sirens in the  
24 background. I am in downtown D.C. where things are a little  
25 bit hairy. I am hearing them go by intermittently, but



1 hopefully all will be well here.

2 I just wanted to add one additional point to the point  
3 that Mr. Sachse said because I also don't think you heard  
4 anything about the quality of what was produced, I think you  
5 heard a lot about the quantity.

6 I just wanted to make the point that there also needs  
7 to be a consideration of the relevant issues in litigation, and  
8 certainly from Sanofi's perspective -- I probably should have  
9 said at the outset this is Paige Sharpe on behalf of Sanofi --  
10 that we have been working to produce the documents that  
11 actually have the most relevance in the litigation.

12 So, what we have produced to Plaintiffs include, you  
13 know, documents going to the key issues in dispute. For  
14 example, we produced the regulatory file for Zantac, which  
15 includes test results and correspondence with FDA on NDMA  
16 related issues. We have produced adverse event reports for the  
17 entire history of the product, including the ones that we have  
18 inherited from the predecessor companies.

19 We have produced the underlying source files for  
20 cancer related adverse events. We have produced meeting  
21 minutes and materials from cross-functional committees that  
22 explored and analyzed the NDMA issues. We produced safety  
23 committee meeting minutes, information from Sanofi's medical  
24 literature database, information from our signal detection  
25 database, information from our product complaint database.

1           And while I do not have those same categories of  
2 information on behalf of the other Defendants, I understand  
3 that they also have been making similar productions.

4           I just wanted to add that I think there also needs to  
5 be a little bit of a focus on the substance of what has been  
6 produced and not just looking at numbers in a vacuum.

7           *MAGISTRATE JUDGE REINHART:* Thank you very much, Ms.  
8 Sharpe. Be safe. It's sad that I have to tell you that, but  
9 be safe.

10          Mr. Friedman or Ms. Horne, if you would like to be  
11 heard, go ahead and activate your camera. You certainly don't  
12 have to.

13          Not seeing anyone, before -- let me just say I  
14 appreciate the report, and I will echo Ms. Luhana, I think both  
15 sides are following their processes. I know there has been a  
16 large production in the last week and you need to review that.  
17 If at the end of that process you believe you are entitled to  
18 some legal remedy, as Judge Rosenberg said, we are here and you  
19 are welcome to invoke PTO 30 procedures to try to get a  
20 resolution.

21          I am hopeful that through continued meet and conferral  
22 and open dialogue like you have been having many of those  
23 issues can be worked through. I thank you for the report, it  
24 has been very helpful.

25          Ms. Luhana, if you want, I can excuse you. You are

1 certainly welcome to stay on the call, but I think you are only  
2 presenting on that one issue.

3 MS. LUHANA: Correct. I just wanted to raise one  
4 point here. In terms of the 38 custodians that we had chosen  
5 for tranche one, 30 of them were supposed to be produced by the  
6 end of December. GSK followed up and told us there were 18  
7 custodians -- 20 custodians that they have electronic documents  
8 for and 14 that had hard copies only.

9 However, GSK had only produced 13 custodial files at  
10 the end of December. Granted, there are some paper files, but  
11 we are missing 17 custodians.

12 Importantly, I just want to highlight for the Court we  
13 are looking at the quality and the quantity of the production.  
14 Specifically, when I updated the Court, I highlighted examples  
15 of current employees who are all with these manufacturers and  
16 work specifically on Zantac. So, to have 18 documents for one  
17 custodian who is highly relevant, and identified as such by  
18 GSK, it is just surprising that we have a dearth of production  
19 like that with 18 documents.

20 That begs the question, is it substantially complete?  
21 However, as we had discussed, we are going to circle back with  
22 the Defendants, assess the production further, and followup  
23 with the Court after that.

24 MAGISTRATE JUDGE REINHART: Thank you, Ms. Luhana. I  
25 appreciate that.

1           MR. SACHSE: Your Honor, if I may respond to that  
2 briefly? Will Sachse for GSK.

3           MAGISTRATE JUDGE REINHART: Briefly, yes.

4           MR. SACHSE: Thank you. So, Ms. Luhana will be happy  
5 to know that there is another production going out either today  
6 or tomorrow which will include additional documents, electronic  
7 documents that went through our QC and privilege review  
8 process, and I think that might answer some of the questions  
9 she has.

10           And with respect to those paper documents that got  
11 held up by COVID and the lockdown in the UK, I have been told  
12 that we have reviewed about three-quarters of the remaining  
13 documents and we should be pushing those out, as I said, the  
14 end of this week, early next week. So, I think we are pretty  
15 close to done here.

16           MAGISTRATE JUDGE REINHART: Very well. As I said  
17 before, there are processes on both sides and I appreciate that  
18 both sides are going through their processes. If at the end of  
19 the processes either side feels there is a remedy to be had,  
20 the Court is here for you. Thank you very much.

21           Let me turn to the next topic, which is the tranche  
22 two custodial files. Let me recognize Ms. Finken on behalf of  
23 the Plaintiffs and, I guess, Mr. Sachse, you are staying on the  
24 call.

25           MS. FINKEN: Good afternoon, Judge Reinhart. Good

1 afternoon, Judge Rosenberg. Tracey Finken on behalf of  
2 Plaintiffs. It is good to see you both again.

3 I just wanted to talk to you very briefly, I will keep  
4 this very brief, about the tranche two custodians. Pursuant to  
5 amended PTO 47, we were instructed to identify a first tranche  
6 of custodians to be due by December 31st, with the  
7 understanding that that would be the first tranche, not the  
8 only tranche of custodians, and we should meet and confer  
9 moving forward about further tranches of custodians.

10 With that being said, we have started that meet and  
11 confer process with the Defendants prior to the holidays and we  
12 intend to continue along that path.

13 We really have tried to focus our first tranche of  
14 custodians on people that were relevant to the issues of the  
15 January 8th deadline, so we stuck mainly with regulatory,  
16 clinical, and pharmacovigilance types of witnesses, and there  
17 are a variety of other functional departments that we will need  
18 to identify witnesses for the second tranche of custodians, as  
19 well as for the class claims.

20 There are sales marketing and payor types of  
21 custodians that are necessary for the class certification and  
22 specifically for the class claims.

23 So, with that being said, we are going to continue  
24 with the meet and confer process. We hoping that we can come  
25 to a resolution with the Defendants about the scope and number

1 of custodians, as well as the timing of the next production,  
2 and we just wanted to put it on your Honor's radar so that you  
3 are aware that we are involved in the process, and we may need  
4 to seek your assistance in the event that we can't come to an  
5 agreement on our own.

6 Thank you.

7 *THE COURT:* Thank you, Ms. Finken.

8 Let me hear from Mr. Sachse.

9 *MR. SACHSE:* Your Honor, Will Sachse again for GSK and  
10 for the brand Defendants. I think I can be short and sweet,  
11 too.

12 I agree with what Ms. Finken said in terms of we have  
13 met and conferred, we are ready to see what names they float to  
14 us and we will consider them and we will work with them.

15 I do think just a couple of considerations from our  
16 perspective. One is that we think we are in kind of a  
17 funneling down, as it were, a funneling down process where we  
18 don't expect that we are going to see a big bonus of 30, 40, 50  
19 additional names. We think we need to be focusing, and I think  
20 the Plaintiffs agree with us on that.

21 I remember many months ago when Ms. Finken and I were  
22 talking and she said, I don't have time to do a hundred  
23 custodians for GSK, and I think that's probably true given the  
24 Court's aggressive schedule.

25 The other observation I have, or consideration I have

1 is that we, on the Defense side, really want to avoid what I  
2 would call death by a thousand cuts.

3 I don't think we want a situation where the Plaintiffs  
4 are going to come back to the well multiple times asking for 10  
5 Z's and 20 Z's of additional custodians. I think we need to  
6 have reasonable limits. We need to have an understanding of  
7 when we can get past document production, move into the heavy  
8 discovery, the deposition schedule that I think we are all  
9 focused on trying to get through.

10 I am not saying that it is going to be our position  
11 that there is an absolute cutoff. If discovery discloses that  
12 maybe there is another one or two custodians that the  
13 Plaintiffs come back and say we really need to see some  
14 documents from this person after a deposition of Mr. X or  
15 Ms. Y, of course we will consider that, we are reasonable.

16 But I do think that, in general, we would like this  
17 process to really focus on, A, funneling down, and B, making  
18 sure that we have some limits, we have some guardrails, and  
19 that is really all I wanted to say.

20 *MAGISTRATE JUDGE REINHART:* Thank you. I will say  
21 this about that whole principle.

22 Ideally we would all like to funnel down, I know the  
23 Plaintiffs would as well. Everybody wants to get to the most  
24 relevant evidence and the most pertinent evidence as quickly as  
25 they can. The problem is everyone on the Plaintiff's side is

1 sort of shooting in the dark because they don't know what the  
2 most pertinent evidence is. They have suspicion about what  
3 might exist, but they don't know that; and likewise on the  
4 Defense side, until you start digging you don't know either.  
5 So, I appreciate that.

6 The suggestion I'd make, and I think I said this  
7 previously, is I view discovery, you have different tools in  
8 your toolbox, some more blunt than others. A broad request for  
9 production is a very blunt tool. Interrogatories are a more  
10 focused tool, and depositions are a very much more focused and  
11 interactive tool.

12 So, I just want to reiterate to the parties that as  
13 you conceptualize your process going forward in discovery, the  
14 Court is certainly open to authorizing you to have extra  
15 interrogatories if that would be more efficient than having  
16 expansive document requests. The Court is open to working with  
17 you on some of the depositions that you are taking and helping  
18 you focus those depositions if you need that help. I hope you  
19 don't, but if you do, we are here.

20 I just want to make sure you are aware that certainly  
21 at least on the issue of interrogatories and requests for  
22 admission, things like that, I recognize those to be valuable  
23 tools and I am happy to give you extras if you need extras.

24 With that, thank you both very much. Ms. Finken, I  
25 don't think you have anything else, so if you are done, I will



1       excuse you.

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

3               *MAGISTRATE JUDGE REINHART:* The next topic is, I'm led  
4 to believe, another happy topic, so I will invite Mr. McGlamry  
5 and Mr. Sachse to brief us on the deposition scheduling. I  
6 always like when I see the word agreement, so that gives me  
7 good news.

8               Mr. McGlamry, let me hear from you.

9               *MR. McGLAMRY:* Thank you, your honor. Good afternoon  
10 to both your Honors. I really do appreciate you all providing  
11 us this opportunity to have this conference and going forward.  
12 We totally agree with the purpose Judge Rosenberg set out in  
13 the initial discussion about the purpose of this, and so that,  
14 from our perspective, is a great thing.

15               I do think we have an agreement here and I know the  
16 star of our show today, Mr. Sachse, will hopefully confirm that  
17 agreement. As your Honors will recall, at our last CMC we had  
18 raised some concerns about scheduling, particularly  
19 depositions.

20               Even before that, but since then primarily, we have  
21 had several communications between the parties. We have had  
22 multiple meet and confers, and ultimately, and most recently,  
23 Mr. Sachse and I have had additional discussions, and I intend  
24 to give a report of sort of two parts of an agreement as it  
25 relates to essentially the scheduling of depositions.

1           The first I would say relates to somewhat of the  
2 mechanics of the deposition scheduling. PTO 54 contemplates a  
3 deposition liaison for each side and we have -- again, since  
4 the last CMC, we have designated on each side a person that  
5 would be the deposition liaison so as to make sure that when  
6 depositions are, you know, agreed upon that we have a mechanism  
7 to inform and serve everybody and make sure they get that  
8 information, including notices.

9           We've also agreed -- and this first sort of agreement  
10 that I am talking about is for all -- as I understand it, is  
11 for the Plaintiffs and all of the Defendants, not just the  
12 brands.

13           We have also sort of talked through a mechanism to  
14 handle the communication and scheduling of the Defendant  
15 current and former employees, as well as nonparty witnesses,  
16 such that, arguably, PTO 54, maybe the letter of what we  
17 drafted would allow a lot of the people being engaged in  
18 setting up, for example, the deposition of a GSK employee.  
19 Essentially what we decided is there would be somebody on our  
20 side, we have designated those people, and on their side, that  
21 would discuss that one, get it set, provide that information to  
22 the deposition liaisons so the word sort of spreads out and  
23 everybody is aware.

24           So, we are more efficient, we are more timely, yet we  
25 are as comprehensive as we can be with regard to that aspect of

1     it.

2             The second report, or the second issue, which I  
3     understand only applies to the brands, because the non-brands  
4     have apparently taken the position that discovery of them is  
5     over, concerns our concern about the length of time that, for  
6     example, your Honors earlier last year and in the fall about  
7     trying to schedule depositions, and we were concerned that it  
8     was taking too long not only to get a date, but then the date  
9     was so far out.

10            We have had, again, very robust discussions, again  
11     ending with discussions with Mr. Sachse on behalf of all of the  
12     brands. What we essentially said was, look, we are getting all  
13     this information in for PTO 47 now, and as was indicated to you  
14     just a moment ago, and we are going to within the next couple  
15     of days provide lists of people we would like to depose, and  
16     what we've asked is that the Defendants, the brands, provide us  
17     dates for those depositions, for the depositions to take place  
18     within 30 to 60 days after we give them the names.

19            In response to that, I believe that Mr. Sachse -- we  
20     have agreed that we -- obviously, the devil is in the details,  
21     as it always is, but that essentially what their goal is, when  
22     we give them those lists, that they make those witnesses  
23     available within the first quarter of the year.

24            Again, as is always the case, the devil is in the  
25     details. It may take longer to round up a former employee

1 versus a current employee that somebody can crack a whip on,  
2 but I think that what we have, we have worked out, hopefully, a  
3 mechanism where, because we have more to do and more to take  
4 and more, you know, production and so forth, that we are  
5 getting these depositions on the front end and, you know, what  
6 I would say quite frankly is, I appreciate Mr. Sachse working  
7 with us on this. I think what we have come to makes a lot of  
8 sense and hopefully we will work with both sides.

9 Thank you, your Honor.

10 *MAGISTRATE JUDGE REINHART:* Thank you, Mr. McGlamry, I  
11 appreciate that.

12 Mr. Sachse.

13 *MR. SACHSE:* Thank you, your Honor. Will Sachse again  
14 for GSK and for the brand Defendants.

15 I will take the kudos. I appreciate that, Mr.  
16 McGlamry, and I think we both deserve a little bit of a victory  
17 lap on this one because I do think that the liaison plan that  
18 we have in place is going to really help to streamline.

19 Just to echo and reiterate what Mr. McGlamry said  
20 about the fact witnesses and the scheduling, we, the lawyers  
21 for the brands, of course we are going to work with the  
22 Plaintiffs, we will see their lists, we will work with them.  
23 We will reach out to witnesses and we will try to figure out  
24 what scheduling works.

25 But again, as Mr. McGlamry said, the devil is in the

1 details, and the witnesses -- as I said, I think, at the last  
2 hearing, the witness is the star, so if the witness is not  
3 available until April, the witness is not available until  
4 April.

5 The other thing, just from a logistics and a practical  
6 standpoint, the schedule, I think we all know, is going to get  
7 very congested in terms of depositions. We are all going to do  
8 our best. For example, we are going to have our next case  
9 management conference in a couple of weeks, and I believe many  
10 of us are going to be doing depositions that week.

11 So, as the schedule fills up, we will be flexible with  
12 the Plaintiffs, we will work with them. I hope and expect that  
13 they will work with us and we will try to accommodate witnesses  
14 and accommodate lawyers, so that we can get all of this done.  
15 It is going to be a bit like a game of Tetris trying to fit all  
16 the pieces together, but we will work hard and get it done.

17 *MAGISTRATE JUDGE REINHART:* Thank you, Mr. Sachse and  
18 Mr. McGlamry, and kudos to both of you on behalf of your  
19 respective sides for working out that agreement.

20 Mr. McGlamry, if you are done for the day, you can  
21 turn off your camera.

22 *MR. McGLAMRY:* No. I am out of here.

23 *MAGISTRATE JUDGE REINHART:* Mr. Sachse, I think you  
24 are also done for a little bit, so you can turn off your  
25 camera.

1           The next issue on the agenda relates to -- it is  
2           titled Sanofi email issue. Let me recognize Mr. Gilbert and  
3           Mr. Agneshwar first. Good afternoon, gentlemen.

4           *MR. GILBERT:* Good afternoon, your Honors. Robert  
5           Gilbert on behalf of the Plaintiffs.

6           *MR. AGNESHWAR:* Good afternoon, your Honor. Anand  
7           Agneshwar on behalf of Sanofi.

8           *MAGISTRATE JUDGE REINHART:* Very well. I just want to  
9           preface our discussion on this issue, following up on what  
10          Judge Rosenberg said earlier about the purpose of this hearing,  
11          I realize there is an issue that has arisen, and first I want  
12          to commend Sanofi for notifying the Plaintiffs promptly and  
13          being transparent on the issue, but I think for today's -- and  
14          I understand there are questions that the Plaintiffs have and  
15          inquiries the Plaintiffs would like to make. I understand  
16          there has been some conversations back and forth between the  
17          parties.

18          For purposes of today we should stay away from all of  
19          that. What I would really like to focus on today is the  
20          process, where are we in the process, Mr. Agneshwar. The  
21          framework is that Rule 37 anticipates that these sorts of  
22          issues may arise in litigation.

23          Rule 37 was enacted specifically to deal with these  
24          sorts of situations and there are procedures that need to be  
25          followed under Rule 37 to allow, first of all, in this case,

1 for Sanofi to conduct a factual inquiry, then to share that  
2 information with the Plaintiffs in a transparent way, to meet  
3 and confer and try to figure out if there are remedial steps  
4 that can be taken that would mitigate any harm to the  
5 Plaintiffs; and then if not, if the Plaintiffs believe at that  
6 point they are entitled some discovery to try to flesh out the  
7 facts, they certainly can request discovery to try to flesh out  
8 the facts.

9           Ultimately, if we need to get to a PTO 32 process to  
10 resolve a specific dispute and there is a remedy that the  
11 Plaintiffs are entitled to, then the Plaintiffs will get the  
12 remedy that they are entitled to.

13           Given that that is a long process, and I know we are  
14 early on in the process, that is what I would like to focus on,  
15 just kind of where we are.

16           Let me turn first to Mr. Agneshwar, and if you can  
17 maybe update the Court on where you think you are in the  
18 process. I am not going to bind you to a specific deadline,  
19 but if you have a general sense of when you might be in a  
20 position to share some conclusions with Mr. Gilbert and sort of  
21 followup from there.

22           So, let me turn it over to Mr. Agneshwar.

23           MR. AGNESHWAR: Thank you, your Honor. Let me add my  
24 happy new years to your Honor and Judge Rosenberg. I  
25 appreciate the forum to address this issue.

1           I do have an update, your Honor, of sorts. We are  
2 continuing to look into the issue, and I can tell your Honor  
3 now, as I told the Plaintiffs the other day, that to get to the  
4 next level, to really understand the scope of the issue, we  
5 have hired a consultant who is an expert in forensics, looking  
6 at emails and seeing what we can put together, what we can  
7 recover to identify the scope of the issue.

8           That work is going on right now, and I expect we are  
9 working on it 24/7, and I expect the work should be at least  
10 far along, if not concluded, by the time of the next discovery  
11 conference, and I hope to be in a position then to understand  
12 the scope of this issue, whether it is just a little blip and  
13 not much at all, or whether it's something more than that.

14           I really don't know at this point, but I will know in  
15 a few weeks at least much more than I know today.

16           At that point, we also will be working with our  
17 consultant to figure out any remedial measures, if any, that we  
18 think are appropriate, and at that point, I will contact Mr.  
19 Gilbert and share with him the facts that I know, and hopefully  
20 work through a solution to this issue if any is needed.

21           At that point, I'd be happy to come back and give the  
22 Court another report on where we are then, but hopefully this  
23 can be resolved amicably without utilizing the Court's formal  
24 procedures.

25           *THE COURT:* All right. Thank you, Mr. Agneshwar. Let



1 me turn to Mr. Gilbert.

2 First of all, I am just sort of laying out the cold  
3 process here. I understand sometimes this sort of situation  
4 can be quite problematic and can create issues for Plaintiffs  
5 and can be prejudicial. I just don't believe we are at the  
6 point in the process where I can reach those conclusions.

7 I don't want you to feel that by not kind of  
8 addressing those issues today I am downplaying any concerns you  
9 may have because I understand, rightly so, the Plaintiffs may  
10 have legitimate concerns about this issue.

11 With that, let me hear from Mr. Gilbert.

12 *MR. GILBERT:* Thank you, your Honors. Thank you for  
13 the opportunity to address the issue.

14 Consistent with your request to keep this at a status  
15 level, I will not delve too deeply into the details, but I  
16 cannot allow, your Honor, your comment about the Sanofi counsel  
17 notifying us promptly to go unresponded to.

18 I apologize, I must say -- and we will address it in  
19 great detail at the appropriate time. We do not believe this  
20 was timely. We do not believe this was early disclosure, and  
21 when the facts come out, and they will, we believe that the  
22 Court will be quite disturbed by the events that took place not  
23 only with respect to a failure to disclose to us at a much  
24 earlier time, but a failure to disclose to the Court on an  
25 earlier time as well.

1           Your Honor, we obviously are in a position right now  
2 where we have to wait for Sanofi and its counsel to complete  
3 this forensic investigation and to provide that report to us  
4 and to the Court, at which time we will have the ability to  
5 consider what remedies, what processes, what discovery, as you  
6 noted, needs to be taken.

7           I want to -- in the spirit of what Judge Rosenberg  
8 said at the beginning, that this hearing, these discovery  
9 conferences are for informational purposes, I want to make sure  
10 it is clear to the Court that the impact of this ongoing effort  
11 that Mr. Agneshwar described is already affecting our ability  
12 to conduct discovery of appropriate Sanofi witnesses.

13           In fact, there was a custodial deposition that had  
14 been agreed to, to be taken on December 11th, long ago it had  
15 been agreed to. The custodial files were to have been produced  
16 to us by Thanksgiving for our review to prepare for that  
17 deposition.

18           This was the number one most important deposition for  
19 us to take at the beginning of this litigation with regard to  
20 Sanofi, and that is why it was discussed and agreed to, and  
21 Sanofi told us right after Thanksgiving that they needed to  
22 postpone the deposition because of some undisclosed problem  
23 with Mr. -- I believe his last name was Bailey -- Mr. Bailey's  
24 custodial file. We now know what that problem is.

25           I want to make sure that the Court knows from an

1 informational standpoint that the schedule that the Defendants  
2 insisted upon for completing discovery and getting to general  
3 causation Daubert by date certain are being impacted already as  
4 a result of this spoliation, regardless whether it is  
5 inadvertent or ultimately found to be intentional. I am not  
6 passing judgment on it now, but the fact is that it is  
7 impacting upon our ability to move forward with regard to  
8 Sanofi.

9 I realize that we may not be in a position to bring a  
10 formal motion for remedy as a result of the effort -- of the  
11 evidence of spoliation until after the report has been  
12 completed and after discovery has been taken, but this is a  
13 matter that we felt, since it first was brought to our  
14 attention on December 23rd -- and Mr. Agneshwar did notify the  
15 Court at our urging, because if he hadn't, we would have. We  
16 felt that it was important to put this on the Court's radar so  
17 that the Court is aware of it.

18 It is an unfolding situation, and as soon as we have  
19 more information from Mr. Agneshwar, we intend to move forward  
20 with it.

21 *MAGISTRATE JUDGE REINHART:* Thank you, Mr. Gilbert.

22 First of all, if my impression of the timing is  
23 mistaken, then I will be the first one to say it is mistaken  
24 when I see additional facts. If it turns out that the timing  
25 of the disclosure is relevant to the Rule 37 analysis, then it

1 will be relevant to the Rule 37 analysis. Like I said, I can't  
2 prejudge any of that. We have to let the process play its way  
3 out.

4 All I can do is assure the Defendants they will have a  
5 fair opportunity to go through their process. If the  
6 Plaintiffs believe they are entitled to a remedy, they will get  
7 a fair hearing to determine if they are entitled to that  
8 remedy. I think that is all we can do at this time. I will  
9 encourage the parties to continue to work on their respective  
10 processes.

11 Thank you, gentlemen, I appreciate it very much.

12 I don't believe either one of you are on for anything  
13 else this afternoon, so I thank you and I will excuse both of  
14 you.

15 *MR. GILBERT:* Thank you, Judge.

16 *MR. AGNESHWAR:* Thank you, your Honor.

17 *MAGISTRATE JUDGE REINHART:* I think, Judge Rosenberg,  
18 you wanted to address the next issue.

19 *THE COURT:* Right. Thank you, Judge Reinhart.

20 The next issue on the agenda generally, as I  
21 understand it at least, is what impact, if any, does the  
22 issuance of the various orders that I issued last year on most,  
23 but not all of the pending Motions to Dismiss, what impact does  
24 that have on discovery.

25 Let me first say that there is still one order that is

1     forthcoming and the Court intends to get that order out  
2     shortly, and that will complete the issuance of all orders on  
3     the first round Motions to Dismiss, but also included a few  
4     second round Motions to Dismiss as well. They were extensive,  
5     as I'm sure you know from reading the orders.

6             I am sure, given when the orders came out at the end  
7     of the year, with the holidays still underway, and we are only  
8     a few days beyond that, that perhaps counsel are still  
9     reviewing the orders, counsel are reviewing the orders with  
10    their clients, counsel are digesting the orders.

11            And certainly as far as repleading goes from the  
12    Plaintiffs' standpoint, Plaintiffs' counsel obviously are  
13    probably undertaking a review and consideration of what  
14    repleading is needed to conform with the Court's orders,  
15    recognizing that there is still one order that is forthcoming.

16            As the Court made very clear in all of its orders, the  
17    timeframe which the parties had outlined in the PTO, the case  
18    management schedule with respect to amended complaints to come  
19    30 days after the Court's orders on these Motions to Dismiss,  
20    in fairness to Plaintiffs I have extended that 30 days to  
21    commence from the date of the last remaining order to be  
22    issued.

23            So, the clock has not started running yet and  
24    Plaintiffs have time to continue to review and consider and  
25    determine how they are going to proceed from this point

1 forward.

2 As far as the Court is concerned, nothing has  
3 particularly or specifically changed with respect to discovery.

4 What I mean by that is, none of the orders that are in  
5 place that have set out the discovery schedule, none of the  
6 pretrial orders that the Court has issued relating to  
7 agreements that categories of Defendants have reached with the  
8 Plaintiffs pursuant to generally what we refer to as core  
9 discovery agreements, those are all still in place.

10 So, until such time as there is a specific event to  
11 change what I will call the status quo of discovery, the Court  
12 would anticipate that all of the parties would be continuing to  
13 meet their obligations in the context of discovery, whether  
14 those are obligations that arise from specific orders that the  
15 Court has issued, agreements that the parties have entered  
16 into, whether in written or other forms, and the Court is not  
17 in a position to say that anything has changed insofar as any  
18 one party is relieved of any specific obligation.

19 If that is anyone's understanding or impression as a  
20 result of the order that did not relate to discovery, but  
21 related to substantive legal issues, then, obviously, the  
22 avenue would be for that party or those parties to file any  
23 appropriate relief after the -- following, you know, the  
24 resolution processes that are in place between the parties  
25 pursuant to PTO 32.

1           That is about as specific as I can get, which is not  
2 very specific because it is still very much in flux, if you  
3 will.

4           Until such time as the Plaintiffs replead and the  
5 Defendants are able to see what is repled and what claims are  
6 being repled and against which parties those claims are being  
7 repled, nothing has changed from the Court's perspective of how  
8 the discovery should be proceeding.

9           It would be incumbent upon any given party or parties  
10 to bring to the Court's attention a belief or a desire or a  
11 request that some agreement that has previously been entered  
12 into that has been memorialized in an order, or some order that  
13 the Court has independently issued affecting discovery, somehow  
14 no longer applies.

15           So, that is what the Court wanted to address as it  
16 relates to the issue that dealt with what impact the Motion to  
17 Dismiss orders had on the current state of affairs of  
18 discovery.

19           With that, I will turn it back over to Judge Reinhart  
20 to pick up on other nonbrand Defendant discovery matters.

21           *MAGISTRATE JUDGE REINHART:* Thank you, Judge. If I  
22 could ask Ms. Goldenberg and Mr. Yoo or Mr. Barnes to turn on  
23 their cameras, please.

24           I don't know if you have anything to report, but since  
25 we gave the brands the opportunity to report on the status of

1     their discovery, I wanted to make sure that the generics and  
2     the retailers and the distributors all had an opportunity to be  
3     heard as well.

4             Let me turn to Ms. Goldenberg. I assume you got  
5     safely where you were going. I know you were in transit  
6     earlier today.

7             *MS. GOLDENBERG:* Yes, I did. Thank you, your Honor.

8             We have had many productive meet and confers with the  
9     generics, and we followed up with all of them, admittedly just  
10    under 48 hours ago, asking them to let us know whether or not  
11    they have completed their core discovery obligations at this  
12    point in time, and it is our understanding -- we have heard  
13    from all but ten of them that they are in compliance with the  
14    core discovery order, so it sounds like most of the generics  
15    are on track with where they need to be.

16            We also had a discussion with Mr. Yoo and a few of his  
17    colleagues the other day and talked about whether or not  
18    they -- their feelings about how discovery should proceed in  
19    light of the Motions to Dismiss, and we appreciate your Honor's  
20    guidance that we just received on how discovery should proceed  
21    from here.

22            To update the Court, we did send all of the generic  
23    Defendants a draft 30(b)(6) notice on December 7, and have had  
24    many meet and confers with almost all of them at this point to  
25    talk about those notices.



1           At this point in time, however, only one of them has  
2           offered to give us a date. Many of them have said that either  
3           they are not willing to do that or they are not going to be  
4           willing to do that for many months. We are still working  
5           through that, but at this point we just wanted to let the Court  
6           know that we are a little bit concerned that if they are  
7           unwilling to put up witnesses at this juncture, that we are  
8           going to be very crunched for time on the aggressive discovery  
9           schedule that we have all entered into.

10           *MAGISTRATE JUDGE REINHART:* Thank you, Ms. Goldenberg,  
11           I appreciate that. Mr. Yoo.

12           *MR. YOO:* Good afternoon, your Honor, and good  
13           afternoon, Judge Rosenberg.

14           Let me start with the discovery that the generics --  
15           I'm sorry, for the Court Reporter, this is Thomas Yoo for the  
16           generic Defendants.

17           Let me start with the work that the generics have been  
18           doing pursuant to PTO 34, that is the core discovery agreement,  
19           and PTO 50, which relates to product identification  
20           information, that the generics have provided.

21           I can't speak in an absolute sense on behalf of what  
22           all 50 or so generics have done and their level of completion.  
23           There are a few exceptions for Defendants who I understand have  
24           ongoing discussions with Plaintiffs' counsel regarding  
25           extensions that they have received or requested, as well as

1 ongoing discussions about potential dismissal from the  
2 litigation altogether.

3 Generally speaking for the group, we have worked very  
4 hard and achieved substantial completion of our obligations  
5 under PTO 34 and PTO 50.

6 The last of the deadlines set by those pretrial orders  
7 was on December 31st, as Ms. Goldenberg mentioned.

8 So, with all of that work, we provided a lot of  
9 information regarding our ANDA files, SOP's, our contracts,  
10 customers, communications with the regulatory agency regarding  
11 the recall, and some other issues as well.

12 So, to Judge Rosenberg's point and very helpful  
13 admonition about expectations regarding discovery obligations  
14 that we have had, we agree that with respect to PTO 34 and PTO  
15 50 and the discovery that we have been engaged in, speaking for  
16 the group generally, we are pursuing completion of those  
17 obligations.

18 I think the issue that remains is new discovery. As  
19 we talked briefly about at the case management conference, the  
20 Plaintiffs, the week before the hearing on the Motions to  
21 Dismiss, approached the generics about 30(b)(6) depositions,  
22 and they at one point sent the group a proposed -- not  
23 proposed, their actual 30(b)(6) notice, I suppose, on some  
24 fairly broad topics related to our manufacturing supply chains  
25 and sales and distribution chains, and issues related to

1 quality management and quality assurance along those steps.

2 As Ms. Goldenberg mentioned, we have been engaged in  
3 good faith meet and confer discussions both as a group, Mr.  
4 Barnes and I and several of our generics colleagues with  
5 leadership for the Plaintiffs, as well as individual meet and  
6 confers by the various generic Defendants.

7 With receipt of the Court's Motion to Dismiss rulings,  
8 we have had discussions on our side about where we now stand on  
9 this further discovery that we have just initiated discussions  
10 with the Plaintiffs on.

11 It is our view that what we would like and what we  
12 really need is to see the Plaintiffs' Amended Complaint, which  
13 it sounds like is something that would be filed in 30 or 45  
14 days time according to the Court's case management schedule,  
15 but right now it is difficult for us to continue with  
16 discussions about any further discovery in the dark because the  
17 Motions to Dismiss rulings have dismissed all of the claims  
18 against the generics, some with prejudice.

19 And with regard to potential claims and theories that  
20 haven't yet been articulated by the Plaintiffs, we don't know  
21 what those are going to look like, and we don't know who the  
22 Plaintiffs are going to choose to sue under those claims.

23 But what we would like to do is first look at the  
24 obligations on the repleading pursuant to Judge Rosenberg's  
25 order with regard to factual specificity, legal bases, etc.,

1 and then meet and confer with the Plaintiffs about what  
2 discovery they want, and whether that discovery is relevant and  
3 proportional to the new claims that they are articulating.

4 At this point, we feel it is appropriate not to  
5 continue on with the discussions based on the old 30(b)(6)  
6 notice that they issued to us before the Court's ruling, and  
7 halt those discussions at least until we see the amended  
8 allegations and then reengage with the Plaintiffs and try to  
9 have a meaningful meet and confer about what is appropriate,  
10 what is proportional, whether things can be prioritized.

11 If the Plaintiffs' discovery requests at that point  
12 are overly broad or we believe not relevant or not compliant  
13 with the Court's Motion to Dismiss rulings, at that point we  
14 can come back to your Honor and have a more concrete discussion  
15 about what the dispute is.

16 *MAGISTRATE JUDGE REINHART:* Thank you, Mr. Yoo.

17 *MS. GOLDENBERG:* Your Honor, can I briefly respond to  
18 that?

19 *MAGISTRATE JUDGE REINHART:* Yes, Ms. Goldenberg.

20 *MS. GOLDENBERG:* My understanding, your Honor, is that  
21 PTO 32, I believe it is, allows us to start discovery in  
22 earnest post CVA world on January 2nd of this year.

23 Per your Honor's ruling or guidance earlier today that  
24 we should not assume that any order entered that was already  
25 entered into has changed anything, it is our understanding that

1 we are permitted to move forward with discovery at this point.

2 I think the orders entered by the Court on the Motions  
3 to Dismiss are quite comprehensive and very clear, and while  
4 our pleadings are, of course, forthcoming and we do intend on  
5 amending them in accordance with the orders, I think we all  
6 have an understanding of what those are going to look like, and  
7 I don't see a reason to delay discovery at this point.

8 And I will just correct that I believe it is PTO 34.

9 *MAGISTRATE JUDGE REINHART:* Okay. I will defer to  
10 Judge Rosenberg, she has already given you the guidance from  
11 the Court.

12 The other thing I would just note for the parties is  
13 this is not a binary. Just because you are not a party does  
14 not mean you can't be subject to discovery, you would just be  
15 subject to discovery presumably under Rule 45, not under Rule  
16 30, and subsequent rules there.

17 So, I would just commend that to the parties to think  
18 about that as you have these discussions, and also to be  
19 mindful that if we are proceeding with discovery against  
20 nonparties under Rule 45, there are some different procedures.  
21 In particular, the objection procedure would allow for  
22 objections to be heard in a different district.

23 There is a provision under Rule 45(f) that, under  
24 exceptional circumstances, any objection can be transferred  
25 back to the Court from which the subpoena issued.

1           I would encourage the parties to maybe meet and confer  
2 about whether they want to have a blanket agreement that in the  
3 event there is third party discovery and there is an objection,  
4 that the parties would agree to try to move that all back here  
5 so that Judge Rosenberg and I can have a unified approach to  
6 discovery and we don't have a judge in a different district who  
7 really isn't involved in this MDL ruling on some discovery  
8 issues.

9           I will leave it at that level of abstraction and let  
10 the parties continue with their conferrals. Again, if you need  
11 to invoke the procedures under PTO 32 and have a formal ruling  
12 on anything, we are here for you.

13           Thank you both, Mr. Yoo and Ms. Goldenberg.

14           Let me turn to the retailers. If I could ask Mr.  
15 Pulaski and Ms. Johnston to come forward.

16           *MR. PULASKI:* Good afternoon, your Honors.

17           *MS. JOHNSTON:* Good afternoon.

18           *MAGISTRATE JUDGE REINHART:* Good afternoon, Ms.  
19 Johnston.

20           Mr. Pulaski, anything to report with regard to the  
21 retailers?

22           *MR. PULASKI:* Sure. At this point, obviously, we have  
23 production underway from the retailers through the registry  
24 process for product identification with loyalty cards and  
25 prescription records, and we have met and conferred with

1 Ms. Johnston on several occasions regarding core discovery  
2 agreement production, as well as the taking of depositions.

3 Pursuant to our core discovery agreement, our  
4 depositions were to begin in earnest after the first ruling on  
5 the Motions to Dismiss, and that time has come and passed. We  
6 had been speaking informally with Ms. Johnston throughout  
7 December about getting dates on the books for the depositions.  
8 The production is due, I believe, on January 15th, which is in  
9 nine days.

10 I know that -- my understanding is Ms. Johnston's  
11 position is similar to Mr. Yoo's position, and I don't want to  
12 speak for her, so I will let her speak on her behalf.

13 I will tell you that our position, to mimic what Ms.  
14 Goldenberg stated, is that we would like to get the depositions  
15 set immediately and get dates, and we would want to ensure that  
16 the core discovery agreement production is timely submitted  
17 prior to the 15th, and again, I am sure we will have  
18 conversations with Ms. Johnston and discuss that.

19 I know that they, too, who have also just received the  
20 Court's orders and it was the holidays and had to meet with all  
21 their clients, are working on those issues. I don't know the  
22 full details of what their position is yet, but Ms. Johnston  
23 can inform the Court.

24 It is our position that, while we don't have the core  
25 discovery production as of yet, hopefully it will be submitted

1 by the 15th, and again we will begin to get dates as soon as  
2 possible to start taking depositions.

3 *MAGISTRATE JUDGE REINHART:* Thank you very much, Mr.  
4 Pulaski. Let me turn to Ms. Johnston.

5 I guess Mr. Pulaski raised two issues. One is, are  
6 you going to meet the January 15th deadline, and then anything  
7 else that you wanted to address.

8 *MS. JOHNSTON:* Good afternoon, your Honors. Sarah  
9 Johnston on behalf of the retailer and pharmacy Defendants.  
10 Nice to see you again. You, too, Judge Rosenberg.

11 So, to address the Court's questions, I will keep this  
12 brief and say, as Judge Rosenberg referenced earlier, a lot has  
13 changed in the last couple of days respecting the scope and the  
14 landscape of the litigation, and having received the orders on  
15 Motions to Dismiss just before the holiday weekend, there was a  
16 lot to digest and talk with each other about, as well as with  
17 our clients, before we could start the meet and confer process  
18 with Plaintiffs' counsel in earnest.

19 I think that the Court's guidance on the process  
20 moving forward and the expectations, as well as the process for  
21 dispute resolution under PTO 32, has been really helpful and we  
22 have heard that loud and clear.

23 I think that Mr. Pulaski and I have a history of very  
24 fruitful meet and confers and have been able to resolve almost  
25 all of our issues without a whole lot of trouble, and I think



1 that we can begin those discussions that we started earlier  
2 this week now that we have the Court's guidance, and I am  
3 hopeful that we can make the necessary progress to get that  
4 accomplished.

5 *MAGISTRATE JUDGE REINHART:* Thank you, Ms. Johnston, I  
6 appreciate it and appreciate everyone's efforts in that regard.  
7 Thank you. I will excuse both of you.

8 I will turn to the distributors. I don't know if  
9 there are any issues, but I want to give them an opportunity to  
10 be heard. So, let me recognize Ms. Boldt and Mr. Kaplan. Good  
11 afternoon to both of you.

12 *MR. KAPLAN:* Good afternoon.

13 *MAGISTRATE JUDGE REINHART:* Ms. Boldt, I have been  
14 letting the Plaintiffs go first, so I will let you go first.  
15 If you could announce your appearance for the Court Reporter,  
16 please.

17 *MS. BOLDT:* Thank you, your Honors. This is Paige  
18 Boldt with Watts Guerra for Plaintiffs.

19 I'm giving you a brief update on the status of the  
20 distributor Defendants discovery. As you are aware, under PTO  
21 57, there is a 45-day window for those Defendants to provide  
22 documents related to the core discovery agreement. That window  
23 opened right before Christmas, and will be closing, completing  
24 at the end of this month.

25 To date, Plaintiffs have not received any production

1 pursuant to this agreement, and Plaintiffs and distributor  
2 Defendants have kind of informally discussed the scope of when  
3 to schedule the depositions, and similar to other groups of  
4 Defendants, we were informed this week that they would not be  
5 providing ongoing dates because of the Court's Motion to  
6 Dismiss last week.

7 With the Court's guidance, we will continue to work  
8 with the distributor Defendants in order to maintain the status  
9 quo of the Court's discovery schedule.

10 *MAGISTRATE JUDGE REINHART:* Thank you, Ms. Boldt.

11 Let me turn to Mr. Kaplan.

12 *MR. KAPLAN:* Good afternoon, your Honor. Andrew  
13 Kaplan, I represent Cardinal Health, Inc. and I am here today  
14 on behalf of the distributor Defendants.

15 I will be brief, I think this has been covered today.  
16 Briefly to update on the status, the core discovery agreement,  
17 as the Court knows, that was related to the distributor  
18 Defendants was signed by this Court on December 16th, so just  
19 after the Motion to Dismiss hearings.

20 At least I know our client, and I think others,  
21 have -- did actually begin producing under the agreement within  
22 seven days of that. So, there have been some productions  
23 pursuant to that agreement. It doesn't call for completion  
24 until February 1st.

25 We have had no discussions with Plaintiffs since the

1 entry of the orders on the Motions to Dismiss about the core  
2 discovery agreement, so this is the first time it is being  
3 raised today. Of course, we will engage and meet and confer  
4 with them and discuss that issue.

5 As to the depositions, the first time a deposition was  
6 raised, or a request for a date for deposition, I believe was  
7 on the 7th of December, and with a request for dates within two  
8 days. We had no notice pending, nothing to work off of.

9 We had asked before the holidays for a draft notice we  
10 had provided some concerns about the draft notice, which  
11 included subjects that did not in any way touch upon  
12 distributors, including 16 topics or subtopics on active  
13 pharmaceutical ingredient for example. We were expecting to  
14 get some comments back on that, and, of course, the orders came  
15 down on the 31st.

16 I think Mr. Yoo expressed this earlier when he was  
17 speaking today, but there are some concerns. Typically, we  
18 would frame what discovery is -- we would agree to based on  
19 whether we think it is relevant and proportional based on the  
20 allegations for the specific claims for a specific Defendant,  
21 and that may differ for a specific Defendant and may not even  
22 be specific to an entire group of distributors.

23 The orders were done -- were very comprehensive and  
24 addressed a lot of issues. We have all been analyzing them and  
25 continue to do so. But at least our general reading was that

1 the vast majority of the claims against the distributors were  
2 dismissed with prejudice.

3 There is a narrow window for amendment, but there are  
4 some potential significant issues with amendments that would  
5 need to be covered, and we want to see what those amendments  
6 are, want to understand specifically how it relates to our  
7 specific clients, and then actually engage in a discussion  
8 about what would be relevant and proportional if it was a well  
9 pled complaint.

10 We have that concern and we heard your Honor's  
11 comments about the PTO 32 and the process, and so, I will say  
12 that we will meet and confer with Plaintiffs and to the extent  
13 there is a dispute we need to raise, we will do it as per the  
14 Court's requirements.

15 Thank you.

16 *MAGISTRATE JUDGE REINHART:* Thank you. I want to be  
17 clear, my reference to PTO 32 is not an invitation to use it if  
18 you don't need to. Trust me, I have plenty of other work to  
19 do. But if you need me, I am here and happy to help you  
20 resolve your issues.

21 Thank you both, Mr. Kaplan and Ms. Boldt. I will  
22 excuse both of you.

23 The last kind of general topic on the agenda for today  
24 has to do with class Plaintiff discovery. Let me turn to  
25 Ms. Whiteley and Mr. Sachse.

1           Good afternoon, Ms. Whiteley.

2           *MS. WHITELEY:* Good afternoon, your Honors. Thank you  
3 again for your time and patience with us today and for having  
4 this conference.

5           I represent the 183 class Plaintiffs in their consumer  
6 and medical monitoring claims. Starting in the summer, late  
7 summer, Plaintiffs substantially completed all of their  
8 informal discovery, and in early October we provided the  
9 Defendants with a spreadsheet listing by Plaintiff the  
10 pharmacies and the retailers and the medical providers for each  
11 Plaintiff so that they would have the basic information on each  
12 of the Plaintiffs.

13           In late October and early November we served responses  
14 to the 94 requests for production in one set for each of the  
15 Plaintiffs, and then we began responding to the 183 sets of  
16 interrogatories between late October and early November, and  
17 those were served on the Defendants by November 6th.

18           At the same time, we began our initial production on a  
19 rolling basis of our -- the documents that were in Plaintiffs'  
20 possession, and we also hired a vendor to collect additional  
21 documents that were not in the Plaintiffs' possession, which we  
22 have been collecting since then and throughout the holidays and  
23 received even more this morning.

24           It is -- we then began a meet and confer process with  
25 the Defendants starting in late December. During our first

1 meet and confer, we mainly discussed the issues of scope,  
2 including the relevant time period for our answers and  
3 production and the appropriate redactions that should be made  
4 to the documents. We had a fruitful meet and confer.

5 We were not able to resolve everything, it is a  
6 lengthy process and it will take more time, but we were able to  
7 exchange some ideas of why we made our objections and why the  
8 Defendants felt that they were unfounded or otherwise.

9 We hope to be able to reach some agreements because we  
10 would like to resolve all of our disagreements with regard to  
11 redactions so that we can make those redactions and begin the  
12 rolling production of the documents that required the  
13 redactions.

14 We also discussed interrogatories, and we will need to  
15 discuss those a bit further, and we have agreed to provide some  
16 followup information and the Defendants have agreed to do the  
17 same. We will pick up that process again tomorrow morning and  
18 I imagine there will be more than one meet and confer because  
19 we will have to go through each of the individual requests and  
20 we will do so diligently in the coming days and weeks if  
21 necessary.

22 I am happy to answer any questions you may have.

23 *MAGISTRATE JUDGE REINHART:* No, Ms. Whiteley, that was  
24 very helpful. I appreciate it very much.

25 Mr. Sachse.

1           MR. SACHSE: Good afternoon, again, your Honor. Will  
2 Sachse on behalf of GSK and the Defendants.

3           I will be very brief. I thought Ms. Whiteley's report  
4 was quite helpful and accurate. I sign on to what she said, we  
5 do have a meet and confer tomorrow.

6           From the Defense perspective, we are concerned about  
7 the volume that we have gotten to date, the volume of documents  
8 we have gotten to date, but I am heartened to hear that those  
9 documents are going to start flowing as soon as we resolve  
10 these redaction issues and some of these other issues.

11           The only other thing I would say about the consumer  
12 class -- and we will raise these issues with the Plaintiffs.  
13 One would be we would like to know if the Plaintiffs intend to  
14 add named Plaintiffs when they replead; and if so, what will  
15 they do to make sure that the new Plaintiffs get caught up on  
16 discovery with the existing Plaintiffs.

17           And the other thing is, just looking at what we have  
18 to date, if we could get a little more basic information about  
19 the Plaintiffs such as address, date of birth, name, that kind  
20 of thing, but as I said, we'll raise that with the Plaintiffs.  
21 I don't expect there are going to be significant issues or  
22 roadblocks and we will report back.

23           MAGISTRATE JUDGE REINHART: Thank you, Mr. Sachse.  
24 Ms. Whiteley, anything further?

25           MS. WHITELEY: No, your Honor. Thank you.

1           *MAGISTRATE JUDGE REINHART:* Thank you both. Ms.  
2 Whiteley, I will excuse you. Mr. Sachse, you have one more at  
3 bat here.

4           Let me recognize Mr. Dearman on behalf of the third  
5 party payors.

6           *MR. DEARMAN:* Good afternoon, your Honors. Mark  
7 Dearman on behalf of the third party payors.

8           *MAGISTRATE JUDGE REINHART:* It occurs to me, Mr.  
9 Sachse, on this one you are kind of playing offense because you  
10 are the one who served the discovery, so maybe I should let you  
11 go first.

12           *MR. SACHSE:* I would be happy to. Again Will Sachse  
13 for the Defendants.

14           I think I can be brief. I want to say at the outset,  
15 Judge Reinhart, when I took a look at the agenda, I was worried  
16 we were going to be here all night, so I have been very  
17 impressed with how orderly we have all been. All the  
18 presenters have been very to the point, I think that's great,  
19 and you have been running a tight ship, so I appreciate it.  
20 So, let me not delay this any longer.

21           We have been talking to the third party payors. They  
22 produced about 36,000 pages of documents. There are some  
23 issues that we are continuing to work through with them. I  
24 think most notably, and there was a reference in the  
25 submission, the pharmacy benefit managers, or the PBMs, I know



1 the Plaintiffs have been trying to get documents, responsive  
2 documents from them and maybe meeting a little resistance, but  
3 we are continuing to work with the Plaintiffs and consider our  
4 options there, maybe going directly to the PBMs.

5 We also are going to continue to work with the  
6 Plaintiffs to follow up on getting more clarity about the  
7 claims data that they have, and also the time periods that are  
8 at issue for the third party payors, the times in which they  
9 allege they were reimbursing the product. But again, nothing  
10 ripe, just a status report, these are some of the things that  
11 are on our mind.

12 *MAGISTRATE JUDGE REINHART:* Thank you, Mr. Sachse.

13 Let me turn to Mr. Dearman. You will get to be the  
14 last speaker for the day.

15 *MR. DEARMAN:* Thank you very much. I agree with what  
16 Will had to say. There have been three meet and confers, there  
17 is a fourth next week. We have collected a significant amount  
18 of ESI and hard copy documents for each of the third party  
19 payors which we are reviewing and which we may be producing in  
20 litigation.

21 The issue that Mr. Sachse raised with respect to the  
22 production to date and the numbers I think sort of does fall  
23 into the category of we are dealing with the pharmacy benefit  
24 managers as they have raised issues with the third party payors  
25 relating to contractual provisions between the third party

1 payors and the PBMs as to what can and cannot be produced,  
2 notwithstanding the fact that there is a protective order in  
3 this case and we provided them with that.

4 So, at these meet and confers we have been discussing  
5 these with Defendants. These issues are not ripe yet, but are  
6 getting ripe, and to the extent that we need assistance, we  
7 will certainly come to the Court. And we appreciate the  
8 Defendants' position today, which is they also may want to get  
9 involved in some offensive discovery on that point.

10 I don't think any issue is ripe right now. We are  
11 meeting and conferring and I think we are all working well  
12 together with respect to this point.

13 *MAGISTRATE JUDGE REINHART:* Thank you very much, Mr.  
14 Dearman.

15 Mr. Sachse, I appreciate the compliment, but I can't  
16 take credit for this being an efficient hearing. I think what  
17 it show us, though, is that if we stick to what Judge Rosenberg  
18 articulated as her vision of these hearings being informational  
19 and not for dispute resolution, and the parties can continue as  
20 they have in this case, identify jointly issues that are  
21 topical and need to be brought to the Court's attention, that  
22 help the Court in managing the litigation going forward either  
23 by highlighting for us the issues that are coming or maybe  
24 raising high level issues for which the Court can give you some  
25 guidance, we can actually cover a lot of ground in these

1     hearings.

2             I thank you for the compliment, but I really commend  
3     the parties for sticking with Judge Rosenberg's vision, and I  
4     think if we continue to do that in the future, these will be  
5     very productive events.

6             With that, Judge Rosenberg, I don't know if you had  
7     anything else you wanted to add other than -- I wanted to thank  
8     the parties for their presentation. It has been very helpful  
9     to me.

10            *THE COURT:* Ditto. Thank you all, and I couldn't  
11     agree more with Judge Reinhart. The credit goes to all of you  
12     who have prepared and presented and informed us of where you  
13     are, the progress you have made and the work that still lies  
14     ahead, that which is going well and that which you are able to  
15     work out cooperatively, and that which perhaps is causing  
16     frustration and may ultimately need to come to the Court for  
17     resolution, all of which is anticipated, all of which is  
18     appropriate, and permissible, and contemplated in a litigation  
19     of this nature.

20            I hope with this meeting and with ongoing regular  
21     meetings that you are assured of really where Judge Reinhart  
22     and I have been all along, which is here, available, engaged,  
23     informed, working hard, and perhaps now that we have all become  
24     more accustomed to Zoom, and really this is going to be the way  
25     this case will proceed for the foreseeable future -- I told you

1 before, our district is not even entertaining trials until  
2 April, and it is unclear whether that is even going to happen.

3 Just by being able to see us more, albeit virtually,  
4 that just gives you even added assurance that we are here and  
5 we are very devoted to working with you to make this case work  
6 for you. By that I mean that it is working in the timeframe  
7 that you set out for yourselves in the case management  
8 schedule, that it is working in a way that gets you, both  
9 sides, information that you need in the most expeditious manner  
10 so that the appropriate narrowing and winnowing and focusing  
11 and sharpening of the issues comes to light for everyone's  
12 benefit.

13 There is no question that the more informed we are  
14 about the day-to-day discovery matters that you are facing  
15 inevitably provides us with a greater knowledge base and that  
16 has to be a good thing.

17 I hope that you all have found the conference today as  
18 productive as we have. As I said, we have a format in place,  
19 if you will, as I outlined in the beginning, and let's give it  
20 a try and see how it works. I am always open to suggestions  
21 for improvement, you know that, and so we will take it  
22 conference by conference and continue along.

23 I would strongly encourage you to meet with the  
24 special master so we can get the next couple of dates on the  
25 calendar, and this way you will know. And I heard a lot of we

1 are going to continue our meet and confers, so please do that.

2 We will be back together again in two weeks or so, and  
3 so if there are matters that come out of those meet and confers  
4 that would be appropriate to put on the agenda for the case  
5 management conference, then let's put it on the agenda. As you  
6 continue to meet and confer, these conferences are an ability  
7 for us to continue to monitor how things are going.

8 At all times, you know that if there is any particular  
9 relief that is needed when you can't resolve matters, then the  
10 processes are there for you to do so.

11 With that, everybody be well and remain safe, and we  
12 look forward to seeing you in a couple of weeks.

13 Thank you again for everything.

14 (Thereupon, the hearing concluded.)

15 \* \* \*

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

18  
19 Date: January 8, 2021

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

21 Signature of Court Reporter  
22  
23  
24  
25

Pauline A. Stipes, Official Federal Reporter

|   |   |   |
|---|---|---|
| <b>MAGISTRATE JUDGE REINHART:</b><br><b>[33]</b> 11/15 11/19 18/1 24/14<br>26/6 27/23 28/2 28/15 31/19<br>33/2 36/9 37/16 37/22 38/7<br>43/20 44/16 47/20 49/9 52/15<br>52/18 53/8 54/17 56/2 57/4<br>57/12 58/9 60/15 62/22 63/22<br>63/25 64/7 65/11 66/12<br><b>MR. AGNESHWAR:</b> [3] 38/5<br>39/22 44/15<br><b>MR. DEARMAN:</b> [2] 64/5 65/14<br><b>MR. GILBERT:</b> [4] 11/17 38/3<br>41/11 44/14<br><b>MR. KAPLAN:</b> [2] 57/11 58/11<br><b>MR. McGLAMRY:</b> [2] 33/8<br>37/21<br><b>MR. PULASKI:</b> [2] 54/15<br>54/21<br><b>MR. SACHSE:</b> [7] 18/3 27/25<br>28/3 30/8 36/12 62/25 64/11<br><b>MR. YOO:</b> [1] 49/11<br><b>MS. BOLDT:</b> [1] 57/16<br><b>MS. FINKEN:</b> [2] 28/24 33/1<br><b>MS. GOLDENBERG:</b> [3] 48/6<br>52/16 52/19<br><b>MS. JOHNSTON:</b> [2] 54/16<br>56/7<br><b>MS. LUHANA:</b> [2] 12/15 27/2<br><b>MS. SHARPE:</b> [1] 24/19<br><b>MS. WHITELEY:</b> [2] 61/1<br>63/24<br><b>THE COURT:</b> [5] 3/16 30/6<br>40/24 44/18 67/9 | 16 [2] 16/19 59/12<br>16 <b>tranche</b> [1] 14/5<br>1600 [1] 1/13<br>16th [1] 58/18<br>17 [1] 27/11<br>1725 [1] 1/16<br>18 [4] 15/25 27/6 27/16<br>27/19<br>183 [2] 61/5 61/15<br>18th [2] 1/13 10/7<br>19103 [1] 1/13<br>19104 [1] 2/20<br>1985 [1] 23/5<br>1987 [1] 23/6<br>1999 [1] 14/15<br>1st [2] 10/18 58/24   | 310-284-3798 [1] 3/12<br>3150 [1] 2/13<br>31st [6] 15/3 15/6 18/24<br>29/6 50/7 59/15<br>32 [8] 6/12 17/25 46/25<br>52/21 54/11 56/21 60/11<br>60/17<br>32 <b>process</b> [1] 39/9<br>33,000 [1] 14/4<br>33134 [1] 1/24<br>33432 [1] 2/16<br>3391 [1] 1/19<br>34 [4] 49/18 50/5 50/14 53/8<br>35 [1] 23/24<br>36,000 [1] 64/22<br>37 [6] 13/18 38/21 38/23<br>38/25 43/25 44/1<br>3798 [1] 3/12<br>38 [4] 15/2 23/14 23/17 27/4 |
| '<br>'80's [1] 21/23<br>/<br>/s [1] 69/20<br>0<br>0500 [1] 2/3<br>1   | 2<br>20 [2] 27/7 31/5<br>20-md-02924-ROSENBERG [1]<br>1/3<br>2000's [1] 21/24<br>20001 [1] 2/23<br>20004 [1] 3/5<br>2005 [1] 21/11<br>2006 [1] 17/7<br>2014 [1] 15/21<br>2015 [1] 15/17<br>2016 [1] 15/25<br>2017 [2] 14/18 14/22<br>2018 [1] 22/1<br>2019 [2] 14/22 15/17<br>202-624-2500 [1] 3/6<br>202-942-5000 [1] 2/23<br>2021 [3] 1/5 15/4 69/19<br>2029 [1] 3/11<br>210 [1] 16/13<br>210-448-0500 [1] 2/3<br>212-836-8011 [1] 3/3<br>213-896-2400 [1] 3/9<br>215-735-1130 [1] 1/14<br>215-994-4000 [1] 2/20<br>2150 [1] 2/12<br>23rd [1] 43/14<br>24 [4] 9/16 9/18 16/4 16/6<br>24,000 [1] 16/4<br>24/7 [1] 40/9<br>2400 [1] 3/9<br>25 [3] 22/22 22/23 23/24<br>250 [1] 3/2<br>2500 [1] 3/6<br>26 [1] 23/17<br>260 [1] 15/21<br>2800 [1] 1/23<br>2925 [1] 1/16<br>2929 [1] 2/19<br>2nd [1] 52/22 | 4<br>40 [2] 17/2 30/18<br>40-year [1] 20/8<br>400 [1] 3/8<br>4000 [1] 2/20<br>404-523-7706 [1] 1/20<br>45 [4] 51/13 53/15 53/20<br>53/23<br>45-day [1] 57/21<br>4555 [1] 1/17<br>47 [8] 12/10 13/3 15/5 16/24<br>17/21 18/18 29/5 35/13<br>48 [1] 48/10   |
|   | 5<br>5 million [1] 13/13<br>50 [5] 30/18 49/19 49/22<br>50/5 50/15<br>50,000 [1] 17/17<br>500 [2] 2/15 14/20<br>5000 [1] 2/23<br>504-524-5777 [1] 2/6<br>54 [2] 34/2 34/16<br>550 [1] 14/16<br>55402 [1] 2/12<br>55th [1] 3/2<br>561-750-3000 [1] 2/16<br>57 [1] 57/21<br>5726 [1] 2/2<br>5777 [1] 2/6<br>5800 [1] 14/25  | 6<br>60 [1] 35/18<br>600 [4] 2/8 14/11 16/7 20/18<br>601 [1] 2/22<br>612-238-3150 [1] 2/13<br>63,000 [1] 17/1<br>68 [1] 12/25<br>6th [2] 4/14 61/17   |
|   | 3<br>30 [15] 15/2 15/6 23/24<br>26/19 27/5 30/18 35/18 45/19<br>45/20 48/23 50/21 50/23<br>51/13 52/5 53/16<br>30,000 [1] 17/17<br>300 [3] 1/19 3/11 15/10<br>3000 [1] 2/16<br>30326 [1] 1/20<br>305-384-7270 [1] 1/24  | 7<br>701 [1] 2/5<br>70130 [1] 2/6<br>713-664-4555 [1] 1/17<br>7270 [1] 1/24<br>75,000 [1] 13/21<br>7706 [1] 1/20  |

|  |   |   |
|--|---|---|
| <b>7</b>   | 9/19  | <b>already</b> [6] 4/22 10/9 42/11 43/3 52/24 53/10   |
| 77098 [1] 1/16   | <b>adverse</b> [5] 13/7 20/15 20/15 25/16 25/20   | <b>also</b> [26] 4/24 10/16 14/18 15/11 15/16 18/5 18/7 20/3 20/10 25/3 25/6 26/3 26/4 34/9 34/13 37/24 40/16 45/3 48/16 53/18 55/19 61/20 62/14 65/5 65/7 66/8                           |
| 772.467.2337 [1] 3/16  | <b>adverse events</b> [1] 13/7  | <b>although</b> [3] 9/15 17/6 22/7  |
| 78,000 [1] 16/5  | <b>advertising</b> [1] 21/24  | <b>altogether</b> [1] 50/2  |
| 78249 [1] 2/3  | <b>affairs</b> [1] 47/17  | <b>always</b> [8] 6/18 6/25 9/14 10/14 33/6 35/21 35/24 68/20   |
| 7th [1] 59/7   | <b>affecting</b> [2] 42/11 47/13  | <b>am</b> [26] 7/13 10/24 12/11 18/15 18/16 20/17 24/12 24/24 24/25 26/21 31/10 32/23 34/10 37/22 39/18 41/2 41/8 43/5 45/6 55/17 57/2 58/13 60/19 62/22 63/8 68/20                       |
| <b>8</b>   | <b>after</b> [17] 8/2 12/2 12/5 17/22 23/12 23/14 23/15 27/23 31/14 35/18 42/21 43/11 43/12 45/19 46/23 55/4 58/19  | <b>amenable</b> [1] 10/24   |
| 800 [1] 2/11   | <b>afternoon</b> [27] 4/1 11/22 11/25 12/16 24/19 24/20 24/21 28/25 29/1 33/9 38/3 38/4 38/6 44/13 49/12 49/13 54/16 54/17 54/18 56/8 57/11 57/12 58/12 61/1 61/2 63/1 64/6 | <b>amended</b> [4] 29/5 45/18 51/12 52/7  |
| 8011 [1] 3/3   |   | <b>amending</b> [1] 53/5  |
| 87,000 [1] 15/1  |   | <b>amendment</b> [1] 60/3   |
| 888-480-1113 [1] 2/9   |   | <b>amendments</b> [2] 60/4 60/5   |
| 8th [2] 3/8 29/15  |   | <b>amicably</b> [1] 40/23   |
| <b>9</b>   |   | <b>amount</b> [3] 17/7 22/3 65/17   |
| 900 [1] 17/4   |   | <b>analysis</b> [2] 43/25 44/1  |
| 90067 [1] 3/12   |   | <b>analytical</b> [1] 14/13   |
| 90071 [1] 3/8  |   | <b>analyzed</b> [1] 25/22   |
| 94 [1] 61/14   |   | <b>analyzing</b> [1] 59/24  |
| 95 [1] 16/16   |   | <b>ANAND</b> [2] 3/1 38/6   |
| <b>A</b>   |   | <b>Anapol</b> [1] 1/12  |
| <b>ability</b> [5] 19/21 42/4 42/11 43/7 69/6                                      |   | <b>ANDA</b> [1] 50/9  |
| <b>able</b> [8] 19/10 47/5 56/24 62/5 62/6 62/9 67/14 68/3                         |   | <b>ANDREW</b> [2] 3/4 58/12   |
| <b>about</b> [73]  |   | <b>Angeles</b> [2] 3/8 3/12   |
| <b>above</b> [1] 69/17   |   | <b>announce</b> [1] 57/15   |
| <b>absolute</b> [2] 31/11 49/21  |   | <b>another</b> [10] 6/23 10/5 15/19 15/23 16/14 16/17 28/5 31/12 33/4 40/22   |
| <b>absolutely</b> [1] 22/7   |   | <b>answer</b> [2] 28/8 62/22  |
| <b>abstraction</b> [1] 54/9  |   | <b>answers</b> [1] 62/2   |
| <b>accommodate</b> [2] 37/13 37/14   |   | <b>anticipate</b> [2] 12/11 46/12   |
| <b>accomplish</b> [1] 18/12  |   | <b>anticipated</b> [2] 10/4 67/17   |
| <b>accomplished</b> [1] 57/4   |   | <b>anticipates</b> [1] 38/21  |
| <b>accordance</b> [1] 53/5   |   | <b>anticipation</b> [1] 7/9   |
| <b>according</b> [1] 51/14   |   | <b>Antonio</b> [1] 2/3  |
| <b>accordingly</b> [2] 11/5 13/25  |   | <b>any</b> [30] 9/1 9/16 12/5 17/24 19/18 19/19 23/18 24/17 24/23 39/4 40/17 40/17 40/20 41/8 44/2 44/21 46/17 46/18 46/22 47/9 51/16 52/24 53/24 57/9 57/25 59/11 62/22 64/20 66/10 69/8 |
| <b>account</b> [1] 21/4  |   | <b>anyone</b> [1] 26/13   |
| <b>accurate</b> [1] 63/4   |   | <b>anyone's</b> [1] 46/19   |
| <b>accustomed</b> [1] 67/24  |   | <b>anything</b> [12] 12/3 25/4 32/25 44/12 46/17 47/24 52/25 54/12 54/20 56/6 63/24 67/7  |
| <b>achieved</b> [1] 50/4   |   | <b>apologize</b> [2] 24/23 41/18  |
| <b>across</b> [1] 13/1   |   | <b>apparently</b> [1] 35/4  |
| <b>activate</b> [2] 24/18 26/11  |   | <b>appear</b> [1] 11/18   |
| <b>active</b> [1] 59/12  |   | <b>appearance</b> [1] 57/15   |
| <b>actively</b> [3] 5/13 10/13 21/21   |   | <b>applies</b> [2] 35/3 47/14   |
| <b>actual</b> [1] 50/23  |   | <b>appreciate</b> [19] 8/11 26/14 27/25 28/17 32/5 33/10 36/6 36/11 36/15 39/25 44/11 48/19 49/11 57/6 57/6 62/24   |
| <b>actually</b> [7] 6/21 21/25 23/15 25/11 58/21 60/7 66/25                        |   |   |
| <b>ADAM</b> [1] 1/15   |   |   |
| <b>add</b> [9] 12/4 12/4 21/1 24/13 25/2 26/4 39/23 63/14 67/7                     |   |   |
| <b>added</b> [1] 68/4  |   |   |
| <b>addition</b> [1] 4/21   |   |   |
| <b>additional</b> [9] 19/1 19/2 25/2 28/6 30/19 31/5 33/23 43/24 61/20             |   |   |
| <b>address</b> [11] 9/13 11/7 13/24 39/25 41/13 41/18 44/18 47/15 56/7 56/11 63/19 |   |   |
| <b>addressed</b> [3] 10/1 13/10 59/24  |   |   |
| <b>addressing</b> [1] 41/8   |   |   |
| <b>admission</b> [1] 32/22   |   |   |
| <b>admittedly</b> [1] 48/9   |   |   |
| <b>admonition</b> [1] 50/13  |   |   |
| <b>advance</b> [4] 7/21 8/15 9/17  |   |   |
|  | <b>ago</b> [5] 23/24 30/21 35/14 42/14 48/10  |   |
|  | <b>agree</b> [10] 6/15 9/14 30/12 30/20 33/12 50/14 54/4 59/18 65/15 67/11  |   |
|  | <b>agreed</b> [12] 8/19 15/1 23/6 23/13 34/6 34/9 35/20 42/14 42/15 42/20 62/15 62/16   |   |
|  | <b>agreement</b> [20] 8/1 30/5 33/6 33/15 33/17 33/24 34/9 37/19 47/11 49/18 54/2 55/2 55/3 55/16 57/22 58/1 58/16 58/21 58/23 59/2   |   |
|  | <b>agreements</b> [4] 46/7 46/9 46/15 62/9  |   |
|  | <b>ahead</b> [2] 26/11 67/14  |   |
|  | <b>albeit</b> [1] 68/3  |   |
|  | <b>alerting</b> [1] 11/21   |   |
|  | <b>alike</b> [1] 8/18   |   |
|  | <b>all</b> [70]   |   |
|  | <b>allegations</b> [2] 52/8 59/20   |   |
|  | <b>allege</b> [1] 65/9  |   |
|  | <b>allow</b> [6] 5/24 18/3 34/17 38/25 41/16 53/21  |   |
|  | <b>allows</b> [1] 52/21   |   |
|  | <b>almost</b> [6] 4/13 13/15 17/2 18/18 48/24 56/24   |   |
|  | <b>alone</b> [1] 13/20  |   |
|  | <b>along</b> [5] 29/12 40/10 51/1 67/22 68/22   |   |

|  |  |   |
|--|--|---|
| <b>A</b><br><b>appreciate...</b> [3] 64/19 66/7 66/15<br><b>apprise</b> [1] 5/21<br><b>approach</b> [1] 54/5<br><b>approached</b> [1] 50/21<br><b>appropriate</b> [13] 7/4 9/11 14/6 40/18 41/19 42/12 46/23 52/4 52/9 62/3 67/18 68/10 69/4<br><b>approximately</b> [8] 5/2 13/5 14/4 14/24 16/4 16/5 16/25 20/5<br><b>April</b> [3] 37/3 37/4 68/2<br><b>Arch</b> [1] 2/19<br><b>are</b> [195]<br><b>areas</b> [1] 13/9<br><b>aren't</b> [2] 9/22 23/25<br><b>arguably</b> [1] 34/16<br><b>arise</b> [3] 6/16 38/22 46/14<br><b>arisen</b> [1] 38/11<br><b>Arnold</b> [2] 2/22 3/1<br><b>articulated</b> [2] 51/20 66/18<br><b>articulating</b> [1] 52/3<br><b>as</b> [132]<br><b>ask</b> [5] 8/15 10/7 11/17 47/22 54/14<br><b>asked</b> [2] 35/16 59/9<br><b>asking</b> [2] 31/4 48/10<br><b>aspect</b> [1] 34/25<br><b>assess</b> [3] 13/23 17/23 27/22<br><b>assistance</b> [2] 30/4 66/6<br><b>assume</b> [2] 48/4 52/24<br><b>assurance</b> [4] 13/9 16/18 51/1 68/4<br><b>assure</b> [2] 4/4 44/4<br><b>assured</b> [1] 67/21<br><b>Atlanta</b> [1] 1/20<br><b>attachments</b> [1] 9/2<br><b>attention</b> [3] 43/14 47/10 66/21<br><b>attributable</b> [1] 17/3<br><b>authorizing</b> [1] 32/14<br><b>availability</b> [1] 10/15<br><b>available</b> [7] 6/15 10/14 10/19 35/23 37/3 37/3 67/22<br><b>avenue</b> [6] 1/16 2/8 2/11 2/22 3/5 46/22<br><b>avenues</b> [1] 6/15<br><b>avoid</b> [1] 31/1<br><b>aware</b> [7] 5/25 12/22 30/3 32/20 34/23 43/17 57/20<br><b>away</b> [1] 38/18 | <b>bases</b> [1] 51/25<br><b>basic</b> [2] 61/11 63/18<br><b>basis</b> [1] 61/19<br><b>bat</b> [1] 64/3<br><b>be</b> [134]<br><b>be an</b> [1] 8/1<br><b>BEACH</b> [3] 1/2 1/5 3/16<br><b>because</b> [22] 7/2 8/2 8/19 20/1 22/7 23/1 23/5 25/3 32/1 35/3 36/3 36/17 41/9 42/22 43/15 47/2 51/16 53/13 58/5 62/9 62/18 64/9<br><b>become</b> [1] 67/23<br><b>been</b> [48] 4/17 4/22 6/20 7/19 8/14 13/15 19/22 23/20 23/21 23/21 24/5 25/10 26/3 26/5 26/15 26/22 26/24 28/11 38/16 42/14 42/15 42/15 43/11 43/12 47/11 47/12 49/17 50/15 51/2 51/20 55/6 56/21 56/24 57/13 58/15 58/22 59/24 61/22 64/16 64/17 64/18 64/19 64/21 65/1 65/16 66/4 67/8 67/22<br><b>before</b> [17] 1/8 6/24 8/15 10/10 19/8 21/17 24/22 26/13 28/17 33/20 50/20 52/6 56/15 56/17 57/23 59/9 68/1<br><b>began</b> [3] 61/15 61/18 61/24<br><b>begin</b> [5] 55/4 56/1 57/1 58/21 62/11<br><b>beginning</b> [4] 4/20 42/8 42/19 68/19<br><b>begs</b> [1] 27/20<br><b>behalf</b> [19] 18/5 18/5 18/18 24/19 25/9 26/2 28/22 29/1 35/11 37/18 38/5 38/7 49/21 55/12 56/9 58/14 63/2 64/4 64/7<br><b>being</b> [17] 4/13 4/24 5/10 7/18 11/9 11/14 29/10 29/23 34/17 38/13 43/3 47/6 47/6 59/2 66/16 66/18 68/3<br><b>belief</b> [1] 47/10<br><b>believe</b> [19] 13/19 19/3 26/17 33/4 35/19 37/9 39/5 41/5 41/19 41/20 41/21 42/23 44/6 44/12 52/12 52/21 53/8 55/8 59/6<br><b>benefit</b> [3] 64/25 65/23 68/12<br><b>best</b> [5] 11/10 11/12 19/21 24/5 37/8<br><b>between</b> [6] 6/8 33/21 38/16 46/24 61/16 65/25<br><b>beyond</b> [2] 11/3 45/8<br><b>BI</b> [8] 13/4 16/3 16/3 16/10 16/15 16/23 17/8 18/24<br><b>BI's</b> [1] 16/6<br><b>big</b> [1] 30/18<br><b>binary</b> [1] 53/13<br><b>bind</b> [1] 39/18<br><b>birth</b> [1] 63/19<br><b>bit</b> [7] 24/25 26/5 36/16 37/15 37/24 49/6 62/15<br><b>Blake</b> [1] 16/11<br><b>blanket</b> [1] 54/2<br><b>blip</b> [1] 40/12 | <b>blunt</b> [2] 32/8 32/9<br><b>Boca</b> [1] 2/16<br><b>Boehringer</b> [2] 21/11 21/15<br><b>BOLDT</b> [6] 2/1 57/10 57/13 57/18 58/10 60/21<br><b>bonus</b> [1] 30/18<br><b>books</b> [1] 55/7<br><b>both</b> [22] 5/14 12/18 22/12 24/22 26/14 28/17 28/18 29/2 32/24 33/10 36/8 36/16 37/18 44/13 51/3 54/13 57/7 57/11 60/21 60/22 64/1 68/8<br><b>Boulevard</b> [1] 1/23<br><b>box</b> [2] 23/10 23/11<br><b>boxes</b> [1] 23/16<br><b>Brammel</b> [1] 16/14<br><b>brand</b> [6] 11/15 14/2 18/5 21/8 30/10 36/14<br><b>brands</b> [18] 12/2 12/21 12/22 12/24 13/1 13/1 13/16 16/9 17/22 18/22 20/5 34/12 35/3 35/3 35/12 35/16 36/21 47/25<br><b>brands have</b> [1] 12/22<br><b>brief</b> [9] 8/20 12/8 29/4 33/5 56/12 57/19 58/15 63/3 64/14<br><b>briefly</b> [6] 28/2 28/3 29/3 50/19 52/17 58/16<br><b>bring</b> [2] 43/9 47/10<br><b>brink</b> [1] 6/9<br><b>broad</b> [3] 32/8 50/24 52/12<br><b>brought</b> [2] 43/13 66/21<br><b>BRUCE</b> [2] 1/9 14/13<br><b>business</b> [1] 21/13 |
| <b>B</b><br><b>back</b> [13] 21/21 27/21 31/4 31/13 38/16 40/21 47/19 52/14 53/25 54/4 59/14 63/22 69/2<br><b>background</b> [1] 24/24<br><b>backwards</b> [1] 9/17<br><b>Bailey</b> [1] 42/23<br><b>Bailey's</b> [1] 42/23<br><b>Barnes</b> [3] 3/10 47/22 51/4<br><b>base</b> [1] 68/15<br><b>based</b> [8] 7/18 13/19 16/21 17/10 22/14 52/5 59/18 59/19  |  | <b>C</b><br><b>CA</b> [2] 3/8 3/12<br><b>calendar</b> [3] 10/3 10/11 68/25<br><b>calendars</b> [2] 10/16 10/18<br><b>call</b> [8] 19/13 20/21 24/18 27/1 28/24 31/2 46/11 58/23<br><b>called</b> [1] 20/15<br><b>came</b> [2] 45/6 59/14<br><b>camera</b> [4] 24/18 26/11 37/21 37/25<br><b>cameras</b> [2] 11/25 47/23<br><b>Camp</b> [1] 2/5<br><b>can</b> [55] 4/3 5/12 7/10 7/16 8/8 8/19 8/22 8/25 10/18 10/20 11/2 11/5 16/23 22/16 23/10 26/23 26/25 29/24 30/10 31/7 31/25 34/25 36/1 37/14 37/20 37/24 39/4 39/7 39/16 40/2 40/6 40/6 40/23 41/4 41/4 41/5 41/6 44/4 44/8 47/1 52/10 52/14 52/17 53/24 54/5 55/23 57/1 57/3 62/11 64/14 66/1 66/19 66/24 66/25 68/24<br><b>can't</b> [6] 30/4 44/1 49/21 53/14 66/15 69/9<br><b>cancer</b> [2] 20/15 25/20<br><b>cannot</b> [3] 7/2 41/16 66/1<br><b>Cardinal</b> [1] 58/13<br><b>cards</b> [1] 54/24<br><b>care</b> [2] 14/18 21/13<br><b>Carey</b> [1] 15/15   |



|  |  |   |
|--|--|---|
| <p><b>C</b></p> <p><b>case</b> [21] 1/3 4/12 4/15 4/21<br/>10/6 10/20 17/9 17/15 19/6<br/>35/24 37/8 38/25 45/17 50/19<br/>51/14 66/3 66/20 67/25 68/5<br/>68/7 69/4</p> <p><b>categorically</b> [1] 19/22</p> <p><b>categories</b> [2] 26/1 46/7</p> <p><b>category</b> [1] 65/23</p> <p><b>caught</b> [1] 63/15</p> <p><b>causation</b> [1] 43/3</p> <p><b>causing</b> [1] 67/15</p> <p><b>cede</b> [1] 18/15</p> <p><b>central</b> [1] 22/8</p> <p><b>Centre</b> [1] 2/19</p> <p><b>Century</b> [1] 3/11</p> <p><b>certain</b> [1] 43/3</p> <p><b>certainly</b> [11] 12/4 18/17<br/>24/16 25/8 26/11 27/1 32/14<br/>32/20 39/7 45/11 66/7</p> <p><b>certification</b> [1] 29/21</p> <p><b>certify</b> [1] 69/16</p> <p><b>Chaffin</b> [2] 2/8 12/17</p> <p><b>chains</b> [2] 50/24 50/25</p> <p><b>change</b> [2] 7/14 46/11</p> <p><b>changed</b> [6] 10/11 46/3 46/17<br/>47/7 52/25 56/13</p> <p><b>chime</b> [1] 18/14</p> <p><b>choose</b> [1] 51/22</p> <p><b>chosen</b> [1] 27/4</p> <p><b>Christmas</b> [1] 57/23</p> <p><b>Cira</b> [1] 2/19</p> <p><b>circle</b> [1] 27/21</p> <p><b>circumstances</b> [1] 53/24</p> <p><b>claims</b> [12] 29/19 29/22 47/5<br/>47/6 51/17 51/19 51/22 52/3<br/>59/20 60/1 61/6 65/7</p> <p><b>clarity</b> [2] 7/10 65/6</p> <p><b>class</b> [6] 29/19 29/21 29/22<br/>60/24 61/5 63/12</p> <p><b>clear</b> [6] 6/25 42/10 45/16<br/>53/3 56/22 60/17</p> <p><b>client</b> [2] 21/20 58/20</p> <p><b>clients</b> [5] 24/14 45/10<br/>55/21 56/17 60/7</p> <p><b>clinical</b> [1] 29/16</p> <p><b>clock</b> [1] 45/23</p> <p><b>close</b> [1] 28/15</p> <p><b>closing</b> [1] 57/23</p> <p><b>CMC</b> [2] 33/17 34/4</p> <p><b>cold</b> [1] 41/2</p> <p><b>colleagues</b> [4] 18/14 24/13<br/>48/17 51/4</p> <p><b>collect</b> [1] 61/20</p> <p><b>collected</b> [1] 65/17</p> <p><b>collecting</b> [1] 61/22</p> <p><b>collective</b> [1] 10/16</p> <p><b>collectively</b> [3] 12/24 13/16<br/>20/4</p> <p><b>combined</b> [1] 17/9</p> <p><b>come</b> [18] 4/4 4/5 4/18 8/10<br/>29/24 30/4 31/4 31/13 36/7<br/>40/21 41/21 45/18 52/14<br/>54/15 55/5 66/7 67/16 69/3</p> <p><b>comes</b> [1] 68/11</p> <p><b>coming</b> [2] 62/20 66/23</p> <p><b>commence</b> [1] 45/21</p> | <p><b>commend</b> [4] 6/18 38/12 53/17<br/>67/2</p> <p><b>comment</b> [2] 6/18 41/16</p> <p><b>comments</b> [3] 12/5 59/14<br/>60/11</p> <p><b>committee</b> [1] 25/23</p> <p><b>committees</b> [1] 25/21</p> <p><b>communication</b> [2] 19/7 34/14</p> <p><b>communications</b> [2] 33/21<br/>50/10</p> <p><b>companies</b> [1] 25/18</p> <p><b>company</b> [3] 20/16 23/5 23/24</p> <p><b>complaint</b> [3] 25/25 51/12<br/>60/9</p> <p><b>complaints</b> [2] 19/25 45/18</p> <p><b>complete</b> [6] 15/9 16/24<br/>19/10 27/20 42/2 45/2</p> <p><b>completed</b> [7] 5/24 12/23<br/>13/2 13/4 43/12 48/11 61/7</p> <p><b>completed noncustodial</b> [1]<br/>13/4</p> <p><b>completing</b> [2] 43/2 57/23</p> <p><b>completion</b> [6] 18/23 19/14<br/>49/22 50/4 50/16 58/23</p> <p><b>compliance</b> [4] 16/19 19/23<br/>19/24 48/13</p> <p><b>compliant</b> [1] 52/12</p> <p><b>complied</b> [1] 15/5</p> <p><b>compliment</b> [2] 66/15 67/2</p> <p><b>comply</b> [1] 19/20</p> <p><b>comprehensive</b> [3] 34/25 53/3<br/>59/23</p> <p><b>conceptualize</b> [1] 32/13</p> <p><b>concern</b> [3] 19/16 35/5 60/10</p> <p><b>concerned</b> [5] 12/20 35/7<br/>46/2 49/6 63/6</p> <p><b>concerns</b> [6] 33/18 35/5 41/8<br/>41/10 59/10 59/17</p> <p><b>concluded</b> [3] 12/6 40/10<br/>69/14</p> <p><b>conclusion</b> [1] 17/20</p> <p><b>conclusions</b> [2] 39/20 41/6</p> <p><b>concrete</b> [1] 52/14</p> <p><b>conduct</b> [2] 39/1 42/12</p> <p><b>confer</b> [17] 29/8 29/11 29/24<br/>39/3 51/3 52/1 52/9 54/1<br/>56/17 59/3 60/12 61/24 62/1<br/>62/4 62/18 63/5 69/6</p> <p><b>conference</b> [36] 1/8 4/10<br/>4/12 5/3 5/4 5/5 5/6 5/8<br/>5/11 6/11 7/13 7/19 7/21<br/>7/25 8/15 8/23 9/12 9/17<br/>9/18 10/1 10/5 10/6 10/17<br/>10/21 10/21 17/10 19/7 33/11<br/>37/9 40/11 50/19 61/4 68/17<br/>68/22 68/22 69/5</p> <p><b>conferences</b> [16] 4/21 4/22<br/>4/23 4/25 5/14 5/18 5/19 6/5<br/>6/6 7/5 7/7 7/9 11/9 18/10<br/>42/9 69/6</p> <p><b>conferral</b> [1] 26/21</p> <p><b>conferrals</b> [1] 54/10</p> <p><b>conferred</b> [3] 14/7 30/13<br/>54/25</p> <p><b>conference</b> [1] 10/6</p> <p><b>conferring</b> [1] 66/11</p> <p><b>confers</b> [11] 15/11 16/10<br/>33/22 48/8 48/24 51/6 56/24</p> | <p>65/16 66/4 69/1 69/3</p> <p><b>confirm</b> [1] 33/16</p> <p><b>conform</b> [1] 45/14</p> <p><b>congested</b> [1] 37/7</p> <p><b>conjunction</b> [1] 5/17</p> <p><b>CONLEE</b> [1] 2/4</p> <p><b>Connor</b> [1] 15/19</p> <p><b>consider</b> [6] 9/25 30/14<br/>31/15 42/5 45/24 65/3</p> <p><b>consideration</b> [3] 25/7 30/25<br/>45/13</p> <p><b>considerations</b> [1] 30/15</p> <p><b>considering</b> [1] 14/21</p> <p><b>consist</b> [1] 17/17</p> <p><b>Consistent</b> [1] 41/14</p> <p><b>constantly</b> [1] 7/15</p> <p><b>constitutes</b> [1] 20/7</p> <p><b>consultant</b> [2] 40/5 40/17</p> <p><b>consumer</b> [4] 14/18 21/13<br/>61/5 63/11</p> <p><b>contact</b> [1] 40/18</p> <p><b>contemplated</b> [1] 67/18</p> <p><b>contemplates</b> [1] 34/2</p> <p><b>context</b> [1] 46/13</p> <p><b>continue</b> [18] 4/24 6/25<br/>29/12 29/23 44/9 45/24 51/15<br/>52/5 54/10 58/7 59/25 65/5<br/>66/19 67/4 68/22 69/1 69/6<br/>69/7</p> <p><b>continued</b> [1] 26/21</p> <p><b>continuing</b> [4] 40/2 46/12<br/>64/23 65/3</p> <p><b>contracts</b> [1] 50/9</p> <p><b>contractual</b> [1] 65/25</p> <p><b>contrary</b> [1] 21/7</p> <p><b>conversations</b> [2] 38/16<br/>55/18</p> <p><b>cooperatively</b> [1] 67/15</p> <p><b>coordinate</b> [2] 10/8 10/19</p> <p><b>copies</b> [1] 27/8</p> <p><b>copy</b> [1] 65/18</p> <p><b>core</b> [12] 20/10 46/8 48/11<br/>48/14 49/18 55/1 55/3 55/16<br/>55/24 57/22 58/16 59/1</p> <p><b>correct</b> [3] 27/3 53/8 69/16</p> <p><b>correspondence</b> [1] 25/15</p> <p><b>could</b> [8] 8/4 11/3 23/16<br/>47/22 54/14 56/17 57/15<br/>63/18</p> <p><b>couldn't</b> [1] 67/10</p> <p><b>counsel</b> [18] 4/19 5/1 5/9<br/>5/18 5/21 7/6 7/23 10/12<br/>10/15 18/11 41/16 42/2 45/8<br/>45/9 45/10 45/12 49/24 56/18</p> <p><b>count</b> [2] 20/11 20/17</p> <p><b>couple</b> [11] 7/22 18/13 18/19<br/>21/17 22/10 30/15 35/14 37/9<br/>56/13 68/24 69/12</p> <p><b>course</b> [8] 18/11 23/20 24/8<br/>31/15 36/21 53/4 59/3 59/14</p> <p><b>court</b> [69] 1/1 3/15 4/15<br/>4/19 5/2 5/10 5/17 5/21 5/24<br/>6/3 6/9 6/10 6/15 6/21 6/24<br/>7/1 7/8 7/20 7/20 8/7 9/23<br/>11/11 11/11 12/20 12/22<br/>13/13 13/25 17/14 17/20<br/>17/23 27/12 27/14 27/23<br/>28/20 32/14 32/16 39/17</p> |
|--|--|---|

|   |   |   |
|---|---|---|
| <b>C</b><br><b>court...</b> [32] 40/22 41/22<br>41/24 42/4 42/10 42/25 43/15<br>43/17 45/1 45/16 46/2 46/6<br>46/11 46/15 46/16 47/13<br>47/15 48/22 49/5 49/15 53/2<br>53/11 53/25 55/23 57/15<br>58/17 58/18 66/7 66/22 66/24<br>67/16 69/21<br><b>Court's</b> [21] 19/23 30/24<br>40/23 43/16 45/14 45/19 47/7<br>47/10 51/7 51/14 52/6 52/13<br>55/20 56/11 56/19 57/2 58/5<br>58/7 58/9 60/14 66/21<br><b>Court's discovery</b> [1] 58/9<br><b>cover</b> [1] 66/25<br><b>covered</b> [2] 58/15 60/5<br><b>COVID</b> [3] 23/21 23/22 28/11<br><b>crack</b> [1] 36/1<br><b>create</b> [3] 4/15 7/24 41/4<br><b>credit</b> [2] 66/16 67/11<br><b>cross</b> [1] 25/21<br><b>cross-functional</b> [1] 25/21<br><b>Crowell</b> [1] 3/4<br><b>crunched</b> [1] 49/8<br><b>current</b> [13] 14/14 14/18<br>15/16 16/12 16/15 16/19<br>16/22 22/5 22/8 27/15 34/15<br>36/1 47/17<br><b>custodial</b> [37] 12/9 12/24<br>14/4 14/25 15/2 15/3 15/6<br>15/7 15/8 15/13 15/18 15/22<br>15/25 16/1 16/4 16/6 16/8<br>16/13 16/16 16/20 17/1 17/3<br>17/7 17/8 17/16 17/18 19/1<br>19/2 19/10 22/17 23/7 24/4<br>27/9 28/22 42/13 42/15 42/24<br><b>custodial documents</b> [1]<br>14/25<br><b>custodian</b> [2] 17/3 27/17<br><b>custodian's</b> [1] 17/16<br><b>custodians</b> [42] 12/25 14/5<br>14/7 14/10 14/10 14/23 14/25<br>15/10 15/12 15/13 16/5 16/6<br>16/7 16/10 16/22 17/1 17/4<br>22/5 22/17 22/18 22/20 22/22<br>23/2 23/5 23/8 23/14 23/17<br>27/4 27/7 27/7 27/11 29/4<br>29/6 29/8 29/9 29/14 29/18<br>29/21 30/1 30/23 31/5 31/12<br><b>customers</b> [1] 50/10<br><b>cutoff</b> [1] 31/11<br><b>cuts</b> [2] 22/12 31/2<br><b>CVA</b> [1] 52/22 | 10/19 11/2 11/3 35/17 55/7<br>55/15 56/1 58/5 59/7 68/24<br><b>Daubert</b> [1] 43/3<br><b>day</b> [10] 8/15 9/16 10/12<br>37/20 40/3 48/17 57/21 65/14<br>68/14 68/14<br><b>day-to-day</b> [1] 68/14<br><b>days</b> [13] 7/22 8/14 35/15<br>35/18 45/8 45/19 45/20 51/14<br>55/9 56/13 58/22 59/8 62/20<br><b>de</b> [1] 1/23<br><b>deadline</b> [6] 18/23 19/21<br>24/8 29/15 39/18 56/6<br><b>deadlines</b> [3] 12/10 18/18<br>50/6<br><b>deal</b> [1] 38/23<br><b>dealing</b> [1] 65/23<br><b>deals</b> [2] 6/13 6/13<br><b>dealt</b> [1] 47/16<br><b>DEARMAN</b> [5] 2/14 64/4 64/7<br>65/13 66/14<br><b>dearth</b> [1] 27/18<br><b>death</b> [1] 31/2<br><b>decade</b> [1] 21/12<br><b>December</b> [15] 12/11 15/3<br>15/6 18/24 27/6 27/10 29/6<br>42/14 43/14 48/23 50/7 55/7<br>58/18 59/7 61/25<br><b>December 11th</b> [1] 42/14<br><b>December 16th</b> [1] 58/18<br><b>December 23rd</b> [1] 43/14<br><b>December 31st</b> [4] 15/6 18/24<br>29/6 50/7<br><b>December 7</b> [1] 48/23<br><b>Dechert</b> [1] 2/18<br><b>decide</b> [1] 9/6<br><b>decided</b> [1] 34/19<br><b>declined</b> [1] 21/25<br><b>deeply</b> [1] 41/15<br><b>Defendant</b> [6] 20/2 21/8<br>34/14 47/20 59/20 59/21<br><b>DEFENDANTS</b> [37] 2/18 13/13<br>13/24 18/5 20/20 26/2 27/22<br>29/11 29/25 30/10 34/11<br>35/16 36/14 43/1 44/4 46/7<br>47/5 48/23 49/16 49/23 51/6<br>56/9 57/20 57/21 58/2 58/4<br>58/8 58/14 58/18 61/9 61/17<br>61/25 62/8 62/16 63/2 64/13<br>66/5<br><b>Defendants'</b> [1] 66/8<br><b>Defense</b> [4] 11/24 31/1 32/4<br>63/6<br><b>defer</b> [1] 53/9<br><b>deficiencies</b> [1] 13/23<br><b>deficient</b> [1] 13/20<br><b>degree</b> [1] 21/9<br><b>delay</b> [2] 53/7 64/20<br><b>delve</b> [1] 41/15<br><b>departments</b> [1] 29/17<br><b>depose</b> [1] 35/15<br><b>deposition</b> [14] 31/8 31/14<br>33/5 34/2 34/3 34/5 34/18<br>34/22 42/13 42/17 42/18<br>42/22 59/5 59/6<br><b>depositions</b> [21] 24/11 32/10<br>32/17 32/18 33/19 33/25 34/6<br>35/7 35/17 35/17 36/5 37/7 | 37/10 50/21 55/2 55/4 55/7<br>55/14 56/2 58/3 59/5<br><b>described</b> [1] 42/11<br><b>deserve</b> [1] 36/16<br><b>designate</b> [1] 14/7<br><b>designated</b> [2] 34/4 34/20<br><b>desire</b> [2] 7/6 47/10<br><b>detail</b> [1] 41/19<br><b>detailed</b> [1] 5/25<br><b>details</b> [6] 14/1 35/20 35/25<br>37/1 41/15 55/22<br><b>detection</b> [1] 25/24<br><b>determine</b> [3] 9/25 44/7<br>45/25<br><b>development</b> [2] 14/14 14/17<br><b>devil</b> [3] 35/20 35/24 36/25<br><b>devoted</b> [1] 68/5<br><b>dialogue</b> [1] 26/22<br><b>did</b> [13] 7/11 8/10 8/16<br>18/22 19/7 19/8 23/12 43/14<br>46/20 48/7 48/22 58/21 59/11<br><b>didn't</b> [3] 9/8 18/19 23/1<br><b>differ</b> [2] 7/14 59/21<br><b>different</b> [5] 21/3 32/7<br>53/20 53/22 54/6<br><b>difficult</b> [2] 15/9 51/15<br><b>digest</b> [1] 56/16<br><b>digesting</b> [1] 45/10<br><b>digging</b> [1] 32/4<br><b>diligently</b> [1] 62/20<br><b>directly</b> [1] 65/4<br><b>director</b> [4] 14/13 16/11<br>16/15 16/18<br><b>disagree</b> [1] 12/12<br><b>disagreed</b> [1] 8/3<br><b>disagreement</b> [2] 6/8 8/4<br><b>disagreements</b> [1] 62/10<br><b>disclose</b> [2] 41/23 41/24<br><b>disclosed</b> [1] 14/8<br><b>discloses</b> [1] 31/11<br><b>disclosure</b> [2] 41/20 43/25<br><b>discontinued</b> [1] 21/25<br><b>discovery</b> [91]<br><b>discrete</b> [1] 6/7<br><b>discuss</b> [5] 9/21 34/21 55/18<br>59/4 62/15<br><b>discussed</b> [6] 4/12 27/21<br>42/20 58/2 62/1 62/14<br><b>discussing</b> [2] 7/25 66/4<br><b>discussion</b> [6] 24/4 33/13<br>38/9 48/16 52/14 60/7<br><b>discussions</b> [14] 33/23 35/10<br>35/11 49/24 50/1 51/3 51/8<br>51/9 51/16 52/5 52/7 53/18<br>57/1 58/25<br><b>Dismiss</b> [17] 4/16 44/23 45/3<br>45/4 45/19 47/17 48/19 50/21<br>51/7 51/17 52/13 53/3 55/5<br>56/15 58/6 58/19 59/1<br><b>dismissal</b> [1] 50/1<br><b>dismissed</b> [2] 51/17 60/2<br><b>dispute</b> [12] 6/6 6/9 6/13<br>7/2 7/4 9/22 25/13 39/10<br>52/15 56/21 60/13 66/19<br><b>disputed</b> [1] 8/3<br><b>disputes</b> [6] 6/8 6/16 6/17<br>6/20 6/24 7/3<br><b>disputes and</b> [1] 7/3 |
| <b>D</b><br><b>D.C</b> [3] 2/23 3/5 24/24<br><b>daily</b> [1] 6/23<br><b>dark</b> [2] 32/1 51/16<br><b>data</b> [1] 65/7<br><b>database</b> [6] 20/10 20/12<br>20/13 25/24 25/25 25/25<br><b>date</b> [18] 6/19 10/14 12/21<br>14/2 17/22 35/8 35/8 43/3<br>45/21 49/2 57/25 59/6 63/7<br>63/8 63/18 63/19 65/22 69/19<br><b>dates</b> [13] 10/8 10/9 10/10   |   |   |

|  |   |  |
|--|---|--|
| <b>D</b><br><b>distributing</b> [1] 22/1<br><b>distribution</b> [1] 50/25<br><b>distributor</b> [5] 57/20 58/1 58/8 58/14 58/17<br><b>distributors</b> [5] 48/2 57/8 59/12 59/22 60/1<br><b>district</b> [6] 1/1 1/1 1/9 53/22 54/6 68/1<br><b>disturbed</b> [1] 41/22<br><b>Ditto</b> [1] 67/10<br><b>DIVISION</b> [1] 1/2<br><b>do</b> [36] 4/23 5/7 5/16 8/6 18/6 19/11 26/1 30/15 30/22 31/16 32/19 33/10 33/15 36/3 36/17 37/7 40/1 41/19 41/20 44/4 44/8 49/3 49/4 51/23 53/4 59/25 60/13 60/19 60/24 62/16 62/20 63/5 63/15 67/4 69/1 69/10<br><b>docket</b> [1] 9/24<br><b>document</b> [5] 9/24 17/15 20/17 31/7 32/16<br><b>documents</b> [72]<br><b>Dodge</b> [3] 7/23 10/19 18/11<br><b>does</b> [7] 8/11 19/3 20/13 44/21 44/23 53/13 65/22<br><b>doesn't</b> [3] 21/5 22/3 58/23<br><b>doing</b> [5] 4/8 23/20 24/5 37/10 49/18<br><b>don't</b> [37] 12/4 16/22 17/9 20/25 21/1 21/15 21/19 22/25 24/3 24/16 25/3 26/11 30/18 30/22 31/3 32/1 32/3 32/4 32/19 32/25 40/14 41/5 41/7 44/12 47/24 51/20 51/21 53/7 54/6 55/11 55/21 55/24 57/8 60/18 63/21 66/10 67/6<br><b>done</b> [12] 6/19 10/9 19/19 24/7 28/15 32/25 37/14 37/16 37/20 37/24 49/22 59/23<br><b>door</b> [1] 19/4<br><b>Dowd</b> [1] 2/14<br><b>down</b> [8] 7/23 23/21 23/22 30/17 30/17 31/17 31/22 59/15<br><b>downplaying</b> [1] 41/8<br><b>downtown</b> [1] 24/24<br><b>draft</b> [3] 48/23 59/9 59/10<br><b>drafted</b> [1] 34/17<br><b>drug</b> [1] 16/11<br><b>due</b> [2] 29/6 55/8<br><b>during</b> [2] 5/25 61/25 | <b>East</b> [1] 3/11<br><b>echo</b> [2] 26/14 36/19<br><b>effective</b> [1] 7/16<br><b>efficient</b> [4] 7/16 32/15 34/24 66/16<br><b>Effie</b> [1] 15/19<br><b>effort</b> [2] 42/10 43/10<br><b>efforts</b> [1] 57/6<br><b>eight</b> [1] 15/3<br><b>either</b> [8] 7/12 12/2 28/5 28/19 32/4 44/12 49/2 66/22<br><b>electronic</b> [3] 18/25 27/7 28/6<br><b>electronic documents</b> [1] 27/7<br><b>else</b> [4] 32/25 44/13 56/7 67/7<br><b>email</b> [4] 8/24 9/3 9/19 38/2<br><b>emails</b> [4] 17/17 20/9 23/8 40/6<br><b>embedded</b> [1] 20/3<br><b>employee</b> [16] 14/14 14/19 15/16 15/16 15/20 15/20 15/24 16/12 16/13 16/14 16/16 16/17 16/19 34/18 35/25 36/1<br><b>employee identified</b> [1] 15/20<br><b>employee who</b> [1] 15/16<br><b>employees</b> [5] 14/8 16/22 22/19 27/15 34/15<br><b>enacted</b> [1] 38/23<br><b>encompasses</b> [1] 10/14<br><b>encourage</b> [3] 44/9 54/1 68/23<br><b>end</b> [12] 10/4 10/10 12/10 18/20 26/17 27/6 27/10 28/14 28/18 36/5 45/6 57/24<br><b>ended</b> [2] 23/13 23/14<br><b>ending</b> [1] 35/11<br><b>engage</b> [2] 59/3 60/7<br><b>engaged</b> [6] 5/25 16/9 34/17 50/15 51/2 67/22<br><b>ensure</b> [1] 55/15<br><b>entered</b> [6] 46/15 47/11 49/9 52/24 52/25 53/2<br><b>entering</b> [1] 4/13<br><b>entertaining</b> [1] 68/1<br><b>entire</b> [4] 20/7 21/13 25/17 59/22<br><b>entitled</b> [6] 26/17 39/6 39/11 39/12 44/6 44/7<br><b>entries</b> [2] 20/18 20/21<br><b>entry</b> [1] 59/1<br><b>ESI</b> [1] 65/18<br><b>ESQ</b> [15] 1/11 1/15 1/18 1/21 2/1 2/4 2/7 2/10 2/14 2/18 2/21 3/1 3/4 3/7 3/10<br><b>essence</b> [1] 5/1<br><b>essentially</b> [8] 13/18 20/13 21/22 22/24 33/25 34/19 35/12 35/21<br><b>etc</b> [1] 51/25<br><b>even</b> [8] 11/3 23/4 33/20 59/21 61/23 68/1 68/2 68/4<br><b>event</b> [7] 9/16 20/15 20/15 25/16 30/4 46/10 54/3<br><b>events</b> [4] 13/7 25/20 41/22 | 67/5<br><b>every</b> [5] 4/23 4/25 5/3 5/14 6/22<br><b>everybody</b> [7] 4/3 4/8 22/25 31/23 34/7 34/23 69/11<br><b>everyone</b> [8] 4/1 4/7 4/8 5/16 7/10 11/22 11/25 31/25<br><b>everyone's</b> [2] 57/6 68/11<br><b>everything</b> [2] 62/5 69/13<br><b>evidence</b> [4] 31/24 31/24 32/2 43/11<br><b>example</b> [11] 9/12 14/13 15/15 20/12 21/10 22/16 25/14 34/18 35/6 37/8 59/13<br><b>examples</b> [1] 27/14<br><b>except</b> [1] 4/17<br><b>exceptional</b> [1] 53/24<br><b>exceptions</b> [2] 22/19 49/23<br><b>exchange</b> [1] 62/7<br><b>excuse</b> [7] 11/18 26/25 33/1 44/13 57/7 60/22 64/2<br><b>executive</b> [1] 16/11<br><b>exist</b> [1] 32/3<br><b>existing</b> [1] 63/16<br><b>expansive</b> [1] 32/16<br><b>expect</b> [6] 18/20 30/18 37/12 40/8 40/9 63/21<br><b>expectations</b> [2] 50/13 56/20<br><b>expected</b> [1] 19/10<br><b>expecting</b> [1] 59/13<br><b>expeditious</b> [1] 68/9<br><b>experience</b> [1] 17/11<br><b>expert</b> [1] 40/5<br><b>explains</b> [1] 21/8<br><b>explored</b> [1] 25/22<br><b>expressed</b> [1] 59/16<br><b>extended</b> [1] 45/20<br><b>extensions</b> [1] 49/25<br><b>extensive</b> [1] 45/4<br><b>extent</b> [4] 17/24 19/18 60/12 66/6<br><b>extra</b> [1] 32/14<br><b>extras</b> [2] 32/23 32/23<br><b>eye</b> [2] 8/5 8/5 |
| <b>E</b><br><b>each</b> [18] 5/14 6/22 8/20 14/2 14/12 15/10 17/5 20/2 20/14 21/7 34/3 34/4 56/16 61/10 61/11 61/14 62/19 65/18<br><b>earlier</b> [9] 35/6 38/10 41/24 41/25 48/6 52/23 56/12 57/1 59/16<br><b>early</b> [10] 18/20 18/21 21/23 21/24 28/14 39/14 41/20 61/8 61/13 61/16<br><b>earnest</b> [3] 52/22 55/4 56/18  |   | <b>F</b><br><b>facing</b> [1] 68/14<br><b>fact</b> [5] 6/12 36/20 42/13 43/6 66/2<br><b>facts</b> [5] 39/7 39/8 40/19 41/21 43/24<br><b>factual</b> [2] 39/1 51/25<br><b>failure</b> [2] 41/23 41/24<br><b>fair</b> [2] 44/5 44/7<br><b>fairly</b> [1] 50/24<br><b>fairness</b> [1] 45/20<br><b>faith</b> [1] 51/3<br><b>fall</b> [2] 35/6 65/22<br><b>Fallon</b> [1] 13/12<br><b>far</b> [4] 35/9 40/10 45/11 46/2<br><b>FDA</b> [1] 25/15<br><b>February</b> [5] 4/14 10/18 10/25 11/1 58/24<br><b>February 6th</b> [1] 4/14<br><b>Federal</b> [1] 69/20<br><b>feel</b> [3] 7/11 41/7 52/4<br><b>feelings</b> [1] 48/18  |

|   |   |  |
|---|---|--|
| <b>F</b><br><b>feels</b> [1] 28/19<br><b>felt</b> [3] 43/13 43/16 62/8<br><b>Ferguson</b> [1] 1/22<br><b>few</b> [8] 10/24 10/25 22/6<br>40/15 45/3 45/8 48/16 49/23<br><b>figure</b> [3] 36/23 39/3 40/17<br><b>file</b> [11] 15/22 15/25 16/13<br>16/16 16/20 17/16 17/18<br>23/24 25/14 42/24 46/22<br><b>filed</b> [2] 9/23 51/13<br><b>files</b> [20] 15/2 15/3 15/6<br>15/7 15/8 15/13 16/1 16/8<br>17/1 19/2 19/2 23/7 23/9<br>24/5 25/19 27/9 27/10 28/22<br>42/15 50/9<br><b>files by</b> [1] 15/3<br><b>filings</b> [1] 9/23<br><b>fills</b> [1] 37/11<br><b>finally</b> [1] 21/20<br><b>find</b> [2] 24/5 24/6<br><b>fine</b> [2] 8/25 11/1<br><b>FINKEN</b> [8] 1/11 11/24 28/22<br>29/1 30/7 30/12 30/21 32/24<br><b>first</b> [39] 4/7 4/10 4/16<br>4/24 5/8 7/18 11/7 11/9<br>11/10 12/7 12/23 18/6 19/11<br>19/18 22/21 29/5 29/7 29/13<br>34/1 34/9 35/23 38/3 38/11<br>38/25 39/16 41/2 43/13 43/22<br>43/23 44/25 45/3 51/23 55/4<br>57/14 57/14 59/2 59/5 61/25<br>64/11<br><b>fit</b> [1] 37/15<br><b>five</b> [3] 8/10 8/14 14/10<br><b>FL</b> [4] 1/5 1/24 2/16 3/16<br><b>flavor</b> [1] 24/14<br><b>flesh</b> [2] 39/6 39/7<br><b>flexible</b> [1] 37/11<br><b>float</b> [1] 30/13<br><b>floor</b> [3] 2/8 3/8 18/15<br><b>FLORIDA</b> [1] 1/1<br><b>flowing</b> [1] 63/9<br><b>flux</b> [1] 47/2<br><b>focus</b> [7] 22/24 26/5 29/13<br>31/17 32/18 38/19 39/14<br><b>focused</b> [3] 31/9 32/10 32/10<br><b>focusing</b> [2] 30/19 68/10<br><b>follow</b> [3] 17/21 17/25 65/6<br><b>followed</b> [3] 27/6 38/25 48/9<br><b>following</b> [3] 26/15 38/9<br>46/23<br><b>followup</b> [4] 17/23 27/22<br>39/21 62/16<br><b>for GSK</b> [1] 30/23<br><b>foregoing</b> [1] 69/16<br><b>forensic</b> [1] 42/3<br><b>forensics</b> [1] 40/5<br><b>foreseeable</b> [1] 67/25<br><b>formal</b> [3] 40/23 43/10 54/11<br><b>format</b> [1] 68/18<br><b>former</b> [3] 22/19 34/15 35/25<br><b>forms</b> [1] 46/16<br><b>forth</b> [3] 17/25 36/4 38/16<br><b>forthcoming</b> [3] 45/1 45/15<br>53/4<br><b>forum</b> [1] 39/25 | <b>forward</b> [11] 29/9 32/13<br>33/11 43/7 43/19 46/1 53/1<br>54/15 56/20 66/22 69/12<br><b>found</b> [3] 14/8 43/5 68/17<br><b>four</b> [5] 8/10 13/1 13/16<br>20/5 22/13<br><b>fourth</b> [1] 65/17<br><b>frame</b> [1] 59/18<br><b>framework</b> [1] 38/21<br><b>frankly</b> [1] 36/6<br><b>Friedman</b> [3] 12/3 24/16<br>26/10<br><b>friendly</b> [1] 7/16<br><b>front</b> [2] 19/15 36/5<br><b>fruitful</b> [2] 56/24 62/4<br><b>frustration</b> [1] 67/16<br><b>Ft</b> [1] 3/16<br><b>full</b> [1] 55/22<br><b>functional</b> [2] 25/21 29/17<br><b>funnel</b> [1] 31/22<br><b>funneling</b> [3] 30/17 30/17<br>31/17<br><b>further</b> [8] 11/2 23/14 27/22<br>29/9 51/9 51/16 62/15 63/24<br><b>future</b> [2] 67/4 67/25<br><b>G</b><br><b>GA</b> [1] 1/20<br><b>game</b> [1] 37/15<br><b>gave</b> [7] 8/12 10/10 18/9<br>20/16 22/22 22/23 47/25<br><b>gearing</b> [1] 24/10<br><b>Geller</b> [1] 2/14<br><b>general</b> [5] 31/16 39/19 43/2<br>59/25 60/23<br><b>generally</b> [5] 18/14 44/20<br>46/8 50/3 50/16<br><b>generic</b> [3] 48/22 49/16 51/6<br><b>generics</b> [10] 48/1 48/9<br>48/14 49/14 49/17 49/20<br>49/22 50/21 51/4 51/18<br><b>gentlemen</b> [2] 38/3 44/11<br><b>get</b> [30] 10/20 19/4 23/10<br>26/19 31/7 31/9 31/23 34/7<br>34/21 35/8 37/6 37/14 37/16<br>39/9 39/11 40/3 44/6 45/1<br>47/1 55/14 55/15 56/1 57/3<br>59/14 63/15 63/18 65/1 65/13<br>66/8 68/24<br><b>gets</b> [1] 68/8<br><b>getting</b> [10] 11/11 18/20<br>20/24 24/10 35/12 36/5 43/2<br>55/7 65/6 66/6<br><b>GILBERT</b> [10] 1/21 1/22 11/21<br>38/2 38/5 39/20 40/19 41/1<br>41/11 43/21<br><b>Giuseppe</b> [1] 15/23<br><b>give</b> [15] 7/9 7/21 8/20 12/7<br>12/14 22/16 32/23 33/24<br>35/18 35/22 40/21 49/2 57/9<br>66/24 68/19<br><b>given</b> [8] 7/4 19/14 22/2<br>30/23 39/13 45/6 47/9 53/10<br><b>gives</b> [3] 20/14 33/6 68/4<br><b>giving</b> [2] 6/8 57/19<br><b>go</b> [12] 7/11 9/3 11/2 23/3<br>24/25 26/11 41/17 44/5 57/14<br>57/14 62/19 64/11 | <b>goal</b> [1] 35/21<br><b>goes</b> [5] 5/8 9/7 16/1 45/11<br>67/11<br><b>going</b> [53] 5/7 5/22 6/1 6/4<br>7/24 8/3 8/12 11/4 12/11<br>12/13 13/22 19/9 23/15 23/25<br>25/13 27/21 28/5 28/18 29/23<br>30/18 31/4 31/10 32/13 33/11<br>35/14 36/18 36/21 37/6 37/7<br>37/8 37/10 37/15 39/18 40/8<br>45/25 48/5 49/3 49/8 51/21<br>51/22 53/6 56/6 63/9 63/21<br>64/16 65/4 65/5 66/22 67/14<br>67/24 68/2 69/1 69/7<br><b>GOLDENBERG</b> [10] 2/10 2/11<br>47/22 48/4 49/10 50/7 51/2<br>52/19 54/13 55/14<br><b>gone</b> [1] 22/20<br><b>good</b> [33] 4/1 11/21 11/25<br>12/16 12/18 19/14 22/16<br>24/19 24/20 24/20 28/25<br>28/25 29/2 33/7 33/9 38/3<br>38/4 38/6 49/12 49/12 51/3<br>54/16 54/17 54/18 56/8 57/10<br>57/12 58/12 61/1 61/2 63/1<br>64/6 68/16<br><b>got</b> [3] 18/18 28/10 48/4<br><b>gotten</b> [2] 63/7 63/8<br><b>Graham</b> [1] 15/15<br><b>Granted</b> [1] 27/10<br><b>great</b> [3] 33/14 41/19 64/18<br><b>greater</b> [1] 68/15<br><b>ground</b> [1] 66/25<br><b>group</b> [5] 50/3 50/16 50/22<br>51/3 59/22<br><b>groups</b> [1] 58/3<br><b>growing</b> [1] 7/15<br><b>GSK</b> [33] 14/24 14/24 15/2<br>15/5 15/8 15/11 15/16 15/20<br>15/23 17/8 18/5 18/18 18/25<br>19/2 19/8 20/12 21/20 21/20<br>21/22 21/23 21/25 22/2 22/17<br>24/8 27/6 27/9 27/18 28/2<br>30/9 30/23 34/18 36/14 63/2<br><b>guardrails</b> [1] 31/18<br><b>Guerra</b> [2] 2/1 57/18<br><b>guess</b> [2] 28/23 56/5<br><b>guidance</b> [11] 7/7 11/8 18/9<br>19/6 48/20 52/23 53/10 56/19<br>57/2 58/7 66/25<br><b>H</b><br><b>had</b> [42] 4/12 4/14 4/18 4/22<br>5/17 10/3 14/8 17/22 19/15<br>21/3 21/11 22/9 24/4 27/4<br>27/8 27/9 27/21 28/19 33/17<br>33/21 33/21 33/23 35/10<br>42/13 42/14 45/17 47/17 48/2<br>48/8 48/16 48/23 50/14 51/8<br>55/6 55/20 58/25 59/8 59/9<br>59/10 62/4 65/16 67/6<br><b>hadn't</b> [1] 43/15<br><b>hair</b> [1] 24/25<br><b>halt</b> [1] 52/7<br><b>handle</b> [1] 34/14<br><b>happen</b> [1] 68/2<br><b>happy</b> [14] 4/8 12/18 18/7<br>18/10 18/15 24/12 28/4 32/23 |
|---|---|--|

|  |   |   |
|--|---|---|
| <p><b>H</b></p> <p>happy... [6] 33/4 39/24<br/>40/21 60/19 62/22 64/12</p> <p>hard [8] 18/17 18/23 19/23<br/>27/8 37/16 50/4 65/18 67/23</p> <p>harm [1] 39/4</p> <p>has [48] 8/14 12/5 13/15<br/>14/4 14/15 14/20 14/24 15/8<br/>15/17 15/21 15/25 16/3 16/13<br/>16/16 16/19 16/25 17/7 19/2<br/>20/18 21/22 23/21 26/5 26/15<br/>26/24 28/9 38/11 38/16 43/11<br/>43/12 45/23 46/2 46/6 46/15<br/>46/17 47/7 47/11 47/12 47/13<br/>49/1 52/25 53/10 55/5 56/12<br/>56/21 58/15 60/24 67/8 68/16</p> <p>hasn't [1] 15/5</p> <p>Hausman [1] 2/2</p> <p>have [202]</p> <p>haven't [1] 51/20</p> <p>having [8] 4/17 4/21 4/22<br/>17/4 26/22 32/15 56/14 61/3</p> <p>he [3] 5/12 43/15 59/16</p> <p>head [1] 14/17</p> <p>health [3] 14/18 21/13 58/13</p> <p>hear [11] 11/12 12/13 19/16<br/>20/25 22/5 22/12 24/23 30/8<br/>33/8 41/11 63/8</p> <p>heard [15] 12/2 20/1 21/1<br/>22/16 24/17 25/3 25/5 26/11<br/>48/3 48/12 53/22 56/22 57/10<br/>60/10 68/25</p> <p>hearing [11] 7/13 8/12 9/10<br/>24/25 37/2 38/10 42/8 44/7<br/>50/20 66/16 69/14</p> <p>hearings [3] 58/19 66/18<br/>67/1</p> <p>heart [1] 19/6</p> <p>heartened [1] 63/8</p> <p>heavy [1] 31/7</p> <p>held [3] 21/16 21/22 28/11</p> <p>hello [1] 4/7</p> <p>help [4] 32/18 36/18 60/19<br/>66/22</p> <p>helpful [10] 7/8 7/20 7/22<br/>18/10 26/24 50/12 56/21<br/>62/24 63/4 67/8</p> <p>helping [1] 32/17</p> <p>her [7] 10/10 15/21 16/19<br/>55/12 55/12 55/12 66/18</p> <p>here [28] 4/6 4/15 5/10 7/3<br/>12/1 13/15 17/13 17/19 19/5<br/>19/7 25/1 26/18 27/4 28/15<br/>28/20 32/19 33/15 37/22 41/3<br/>48/21 54/4 54/12 58/13 60/19<br/>64/3 64/16 67/22 68/4</p> <p>high [1] 66/24</p> <p>highlight [1] 27/12</p> <p>highlighted [1] 27/14</p> <p>highlighting [1] 66/23</p> <p>highly [13] 14/8 14/11 14/20<br/>15/12 15/13 15/15 15/20<br/>15/24 16/10 16/12 16/15<br/>16/18 27/17</p> <p>highly relevant [1] 15/12</p> <p>him [1] 40/19</p> <p>hired [2] 40/5 61/20</p> | <p>his [6] 12/6 15/25 16/13<br/>16/16 42/23 48/16</p> <p>historic [1] 22/18</p> <p>history [7] 20/8 21/4 21/4<br/>22/2 22/13 25/17 56/23</p> <p>holiday [1] 56/15</p> <p>holidays [6] 19/8 29/11 45/7<br/>55/20 59/9 61/22</p> <p>Holland [1] 3/7</p> <p>HON [1] 3/15</p> <p>honor [25] 12/16 18/4 24/20<br/>28/1 30/9 33/2 33/9 36/9<br/>36/13 38/6 39/23 39/24 40/1<br/>40/2 41/16 42/1 44/16 48/7<br/>49/12 52/14 52/17 52/20<br/>58/12 63/1 63/25</p> <p>Honor's [4] 30/2 48/19 52/23<br/>60/10</p> <p>HONORABLE [2] 1/8 1/9</p> <p>Honors [10] 33/10 33/17 35/6<br/>38/4 41/12 54/16 56/8 57/17<br/>61/2 64/6</p> <p>hope [9] 3/8 4/8 6/14 32/18<br/>37/12 40/11 62/9 67/20 68/17</p> <p>hopeful [2] 26/21 57/3</p> <p>hopefully [11] 8/1 8/8 11/8<br/>18/12 25/1 33/16 36/2 36/8<br/>40/19 40/22 55/25</p> <p>hoping [2] 19/4 29/24</p> <p>horizon [1] 5/23</p> <p>Horne [3] 12/3 24/17 26/10</p> <p>hour [1] 9/18</p> <p>hours [3] 9/16 9/18 48/10</p> <p>Houston [1] 1/16</p> <p>how [22] 5/8 5/22 6/1 6/4<br/>6/19 7/7 7/14 11/10 15/9<br/>16/23 17/9 20/11 21/7 23/11<br/>45/25 47/7 48/18 48/20 60/6<br/>64/17 68/20 69/7</p> <p>however [5] 13/11 13/21 27/9<br/>27/21 49/1</p> <p>hundred [2] 22/6 30/22</p> <p>hundreds [1] 22/14</p> <p><b>I</b></p> <p>I welcome [1] 12/4</p> <p>I'd [2] 32/6 40/21</p> <p>I'm [4] 33/3 45/5 49/15<br/>57/19</p> <p>idea [1] 9/5</p> <p>Ideally [1] 31/22</p> <p>ideas [1] 62/7</p> <p>identification [2] 49/19<br/>54/24</p> <p>identified [10] 14/11 15/11<br/>15/15 15/20 15/24 16/10<br/>16/12 16/14 16/17 27/17</p> <p>identify [5] 16/1 29/5 29/18<br/>40/7 66/20</p> <p>identifying [1] 14/6</p> <p>imagine [2] 15/9 62/18</p> <p>immediately [1] 55/15</p> <p>impact [4] 42/10 44/21 44/23<br/>47/16</p> <p>impacted [1] 43/3</p> <p>impacting [1] 43/7</p> <p>importance [1] 16/21</p> <p>important [3] 19/5 42/18</p> | <p>43/16</p> <p>Importantly [1] 27/12</p> <p>impressed [1] 64/17</p> <p>impression [2] 43/22 46/19</p> <p>improve [1] 7/14</p> <p>improvement [1] 68/21</p> <p>inadvertent [1] 43/5</p> <p>Inc [1] 58/13</p> <p>inception [1] 4/14</p> <p>include [5] 9/8 13/6 16/6<br/>25/12 28/6</p> <p>included [3] 20/9 45/3 59/11</p> <p>includes [1] 25/15</p> <p>including [5] 16/11 25/17<br/>34/8 59/12 62/2</p> <p>incomplete [1] 16/2</p> <p>incredibly [2] 18/17 18/22</p> <p>incumbent [1] 47/9</p> <p>independently [1] 47/13</p> <p>indicated [1] 35/13</p> <p>indication [1] 8/12</p> <p>individual [3] 20/21 51/5<br/>62/19</p> <p>inevitably [1] 68/15</p> <p>inform [3] 8/6 34/7 55/23</p> <p>informal [1] 61/8</p> <p>informally [2] 55/6 58/2</p> <p>information [19] 6/3 7/8<br/>20/14 20/24 25/23 25/24<br/>25/25 26/2 34/8 34/21 35/13<br/>39/2 43/19 49/20 50/9 61/11<br/>62/16 63/18 68/9</p> <p>informational [6] 5/20 6/2<br/>8/2 42/9 43/1 66/18</p> <p>informed [5] 17/15 58/4<br/>67/12 67/23 68/13</p> <p>Ingelheim [2] 21/11 21/15</p> <p>ingredient [1] 59/13</p> <p>inherited [1] 25/18</p> <p>initial [2] 33/13 61/18</p> <p>initiated [1] 51/9</p> <p>inquire [1] 9/9</p> <p>inquiries [1] 38/15</p> <p>inquiry [1] 39/1</p> <p>insisted [1] 43/2</p> <p>insofar [2] 8/18 46/17</p> <p>instance [1] 20/14</p> <p>instructed [1] 29/5</p> <p>instructed to [1] 29/5</p> <p>intend [6] 24/9 29/12 33/23<br/>43/19 53/4 63/13</p> <p>intended [1] 13/6</p> <p>intends [1] 45/1</p> <p>intention [1] 6/7</p> <p>intentional [1] 43/5</p> <p>interact [1] 5/2</p> <p>interactive [1] 32/11</p> <p>interested [2] 9/10 22/23</p> <p>intermittently [1] 24/25</p> <p>interrogatories [5] 32/9<br/>32/15 32/21 61/16 62/14</p> <p>intervention [3] 6/21 6/24<br/>7/1</p> <p>investigation [4] 22/9 22/15<br/>23/15 42/3</p> <p>invitation [1] 60/17</p> <p>invite [2] 12/14 33/4</p> <p>invoke [2] 26/19 54/11</p> |
|--|---|---|

|   |  |  |
|---|--|--|
| <b>I</b><br><b>involved</b> [4] 14/19 30/3 54/7 66/9<br><b>involvement</b> [2] 17/6 22/9<br><b>involving</b> [1] 11/15<br><b>is</b> [211]<br><b>is just</b> [1] 27/18<br><b>isn't</b> [1] 54/7<br><b>isolated</b> [1] 6/20<br><b>issuance</b> [2] 44/22 45/2<br><b>issue</b> [24] 27/2 32/21 35/2 38/1 38/2 38/9 38/11 38/13 39/25 40/2 40/4 40/7 40/12 40/20 41/10 41/13 44/18 44/20 47/16 50/18 59/4 65/8 65/21 66/10<br><b>issued</b> [8] 4/17 44/22 45/22 46/6 46/15 47/13 52/6 53/25<br><b>issues</b> [34] 5/23 8/6 25/7 25/13 25/16 25/22 26/23 29/14 38/22 41/4 41/8 46/21 50/11 50/25 54/8 55/21 56/5 56/25 57/9 59/24 60/4 60/20 62/1 63/10 63/10 63/12 63/21 64/23 65/24 66/5 66/20 66/23 66/24 68/11<br><b>it</b> [118]<br><b>it's</b> [2] 26/8 40/13<br><b>items</b> [1] 9/14<br><b>its</b> [3] 42/2 44/2 45/16<br><b>itself</b> [1] 8/5  | 34/11 35/14 36/19 37/5 38/8 39/15 40/12 41/2 41/5 48/9 48/20 49/5 51/9 53/8 53/12 53/13 53/14 53/17 55/19 56/15 58/18 63/17 65/10 68/3 68/4<br><b>K</b><br><b>Kanner</b> [1] 2/5<br><b>KAPLAN</b> [5] 3/4 57/10 58/11 58/13 60/21<br><b>Kaye</b> [2] 2/22 3/1<br><b>keep</b> [5] 22/11 24/7 29/3 41/14 56/11<br><b>key</b> [2] 19/7 25/13<br><b>Kherkher</b> [1] 1/15<br><b>kind</b> [10] 7/8 20/3 22/12 30/16 39/15 41/7 58/2 60/23 63/19 64/9<br><b>Knight</b> [1] 3/7<br><b>know</b> [46] 7/24 8/22 11/4 12/1 12/10 18/24 19/20 21/16 22/8 25/13 26/15 28/5 31/22 32/1 32/3 32/4 33/15 34/6 36/4 36/5 37/6 39/13 40/14 40/14 40/15 40/19 42/24 45/5 46/23 47/24 48/5 48/10 49/6 51/20 51/21 55/10 55/19 55/21 57/8 58/20 63/13 64/25 67/6 68/21 68/25 69/8<br><b>knowledge</b> [1] 68/15<br><b>knowledgeable</b> [1] 5/24<br><b>knows</b> [2] 42/25 58/17<br><b>Kopelowitz</b> [1] 1/22<br><b>kudos</b> [2] 36/15 37/18 | <b>lend</b> [1] 8/4<br><b>length</b> [1] 35/5<br><b>lengthy</b> [4] 21/3 21/3 21/4 62/6<br><b>Leon</b> [1] 1/23<br><b>less</b> [7] 8/5 14/11 14/15 14/20 15/10 16/7 17/4<br><b>let</b> [41] 7/9 11/13 11/17 11/20 11/23 12/13 12/15 18/3 18/13 21/21 24/23 26/13 28/21 28/22 30/8 33/8 38/2 39/16 39/22 39/23 40/25 41/11 44/2 44/25 48/4 48/10 49/5 49/14 49/17 54/9 54/14 55/12 56/4 57/10 57/14 58/11 60/24 64/4 64/10 64/20 65/13<br><b>let's</b> [5] 14/2 14/24 23/3 68/19 69/5<br><b>letter</b> [1] 34/16<br><b>letting</b> [1] 57/14<br><b>level</b> [7] 5/25 6/21 40/4 41/15 49/22 54/9 66/24<br><b>LIABILITY</b> [1] 1/5<br><b>liaison</b> [3] 34/3 34/5 36/17<br><b>liaisons</b> [1] 34/22<br><b>license</b> [1] 21/22<br><b>lies</b> [1] 67/13<br><b>light</b> [2] 48/19 68/11<br><b>like</b> [34] 6/18 8/9 9/5 9/20 10/11 12/5 12/7 14/1 20/22 23/1 23/21 24/17 26/10 26/22 27/19 31/16 31/22 32/22 33/6 35/15 37/15 38/15 38/19 39/14 44/1 48/14 51/11 51/13 51/21 51/23 53/6 55/14 62/10 63/13<br><b>liked</b> [1] 7/12<br><b>likely</b> [1] 13/20<br><b>likewise</b> [1] 32/3<br><b>limited</b> [1] 12/20<br><b>limits</b> [2] 31/6 31/18<br><b>list</b> [3] 16/1 22/22 22/23<br><b>listing</b> [1] 61/9<br><b>lists</b> [3] 35/15 35/22 36/22<br><b>litany</b> [1] 20/1<br><b>literature</b> [1] 25/24<br><b>litigation</b> [13] 1/5 4/20 6/1 13/15 25/7 25/11 38/22 42/19 50/2 56/14 65/20 66/22 67/18<br><b>litigations</b> [1] 17/11<br><b>little</b> [9] 21/12 24/24 26/5 36/16 37/24 40/12 49/6 63/18 65/2<br><b>LLC</b> [1] 2/5<br><b>LLP</b> [9] 2/1 2/8 2/14 2/18 2/22 3/1 3/4 3/7 3/10<br><b>lockdown</b> [1] 28/11<br><b>Logan</b> [1] 1/12<br><b>logistics</b> [1] 37/5<br><b>logs</b> [1] 20/21<br><b>long</b> [4] 22/20 35/8 39/13 42/14<br><b>longer</b> [3] 35/25 47/14 64/20<br><b>look</b> [16] 8/9 8/18 10/18 10/25 21/7 22/25 23/3 23/7 23/10 35/12 40/2 51/21 51/23 53/6 64/15 69/12<br><b>looking</b> [7] 10/2 10/5 23/23 |
| <b>J</b><br><b>Janet</b> [1] 16/17<br><b>January</b> [10] 1/5 10/7 11/1 15/4 19/11 29/15 52/22 55/8 56/6 69/19<br><b>January 15th</b> [2] 55/8 56/6<br><b>January 18th</b> [1] 10/7<br><b>January 2021</b> [1] 15/4<br><b>January 8th</b> [1] 29/15<br><b>job</b> [1] 19/14<br><b>JOHNSTON</b> [10] 3/10 54/15 54/19 55/1 55/6 55/18 55/22 56/4 56/9 57/5<br><b>Johnston's</b> [1] 55/10<br><b>joined</b> [2] 14/14 14/18<br><b>jointly</b> [1] 66/20<br><b>judge</b> [44] 1/9 1/10 5/12 7/2 8/11 9/4 9/6 9/24 11/13 11/16 11/18 12/8 13/12 18/6 18/6 18/8 19/6 24/21 26/18 28/25 29/1 33/12 38/10 39/24 42/7 44/15 44/17 44/19 47/19 47/21 49/13 50/12 51/24 53/10 54/5 54/6 56/10 56/12 64/15 66/17 67/3 67/6 67/11 67/21<br><b>Judges</b> [3] 12/19 14/6 17/10<br><b>judgment</b> [1] 43/6<br><b>junction</b> [1] 49/7<br><b>just</b> [54] 4/3 5/23 7/5 8/16 9/19 18/13 18/16 19/1 19/16 19/22 20/1 20/9 20/9 20/25 22/25 24/17 25/2 25/6 26/4 26/6 26/13 27/3 27/12 27/18 29/3 30/2 30/15 32/12 32/20 | <b>L</b><br><b>LA</b> [1] 2/6<br><b>landscape</b> [1] 56/14<br><b>lap</b> [1] 36/17<br><b>large</b> [1] 26/16<br><b>larger</b> [1] 14/22<br><b>LaSalle</b> [1] 2/11<br><b>last</b> [23] 4/11 5/6 10/4 10/4 13/22 14/21 17/6 17/10 19/6 24/4 26/16 33/17 34/4 35/6 37/1 42/23 44/22 45/21 50/6 56/13 58/6 60/23 65/14<br><b>last remaining</b> [1] 45/21<br><b>lastly</b> [2] 10/2 16/25<br><b>late</b> [4] 61/6 61/13 61/16 61/25<br><b>later</b> [1] 5/4<br><b>Law</b> [1] 2/11<br><b>lawyers</b> [2] 36/20 37/14<br><b>laying</b> [1] 41/2<br><b>lead</b> [3] 5/17 7/23 10/12<br><b>leadership</b> [1] 51/5<br><b>learning</b> [1] 8/13<br><b>least</b> [14] 5/17 8/18 10/20 11/3 11/9 13/13 17/4 32/21 40/9 40/15 44/21 52/7 58/20 59/25<br><b>leave</b> [1] 54/9<br><b>led</b> [1] 33/3<br><b>left</b> [3] 23/5 23/24 23/25<br><b>legal</b> [3] 26/18 46/21 51/25<br><b>legitimate</b> [1] 41/10                       |  |

|   |  |   |
|---|--|---|
| <b>L</b><br><b>looking...</b> [4] 26/6 27/13 40/5 63/17<br><b>Los</b> [2] 3/8 3/12<br><b>lot</b> [12] 22/16 23/1 25/5 34/17 36/7 50/8 56/12 56/16 56/25 59/24 66/25 68/25<br><b>loud</b> [1] 56/22<br><b>loyalty</b> [1] 54/24<br><b>lucky</b> [1] 23/9<br><b>LUHANA</b> [15] 2/7 2/8 11/17 11/23 12/15 12/17 12/17 18/2 19/17 21/10 23/13 26/14 26/25 27/24 28/4<br><b>Luhana's</b> [1] 19/25  | 36/16 36/19 36/25 37/18 37/20<br><b>md</b> [1] 1/3<br><b>MDL</b> [7] 4/6 4/11 4/14 4/15 7/16 13/12 54/7<br><b>me</b> [44] 5/12 7/9 11/13 11/17 11/18 11/20 11/21 11/23 12/8 12/13 12/15 18/3 18/13 21/21 22/6 24/23 26/13 28/21 28/22 30/8 33/6 33/8 38/2 39/16 39/22 39/23 41/1 41/11 44/25 48/4 49/14 49/17 54/14 56/4 57/10 58/11 60/18 60/19 60/24 64/4 64/8 64/20 65/13 67/9<br><b>mean</b> [3] 46/4 53/14 68/6<br><b>meaningful</b> [1] 52/9<br><b>means</b> [1] 22/13<br><b>meant</b> [1] 12/12<br><b>meantime</b> [1] 24/10<br><b>measures</b> [1] 40/17<br><b>mechanics</b> [1] 34/2<br><b>mechanism</b> [3] 34/6 34/13 36/3<br><b>medical</b> [3] 25/23 61/6 61/10<br><b>meet</b> [36] 15/11 16/9 18/17 18/23 24/9 26/21 29/8 29/10 29/24 33/22 39/2 46/13 48/8 48/24 51/3 51/5 52/1 52/9 54/1 55/20 56/6 56/17 56/24 59/3 60/12 61/24 62/1 62/4 62/18 63/5 65/16 66/4 68/23 69/1 69/3 69/6<br><b>meet and</b> [1] 16/9<br><b>meeting</b> [6] 8/8 25/20 25/23 65/2 66/11 67/20<br><b>meetings</b> [1] 67/21<br><b>memorialized</b> [1] 47/12<br><b>memos</b> [1] 20/10<br><b>Mensey</b> [1] 16/17<br><b>mentioned</b> [3] 21/10 50/7 51/2<br><b>mere</b> [1] 15/25<br><b>met</b> [5] 14/7 18/24 18/25 30/13 54/25<br><b>Miami</b> [1] 1/24<br><b>MICHAEL</b> [1] 1/18<br><b>might</b> [6] 7/14 20/20 23/4 28/8 32/3 39/19<br><b>million</b> [3] 13/13 13/17 20/5<br><b>millions</b> [3] 17/11 17/12 22/14<br><b>mimic</b> [1] 55/13<br><b>mind</b> [2] 22/11 65/11<br><b>mindful</b> [1] 53/19<br><b>minds</b> [1] 8/8<br><b>Minneapolis</b> [1] 2/12<br><b>minutes</b> [2] 25/21 25/23<br><b>missing</b> [1] 27/11<br><b>mistaken</b> [2] 43/23 43/23<br><b>mitigate</b> [1] 39/4<br><b>MN</b> [1] 2/12<br><b>moment</b> [1] 35/14<br><b>monitor</b> [1] 69/7<br><b>monitoring</b> [1] 61/6<br><b>month</b> [5] 4/24 4/25 5/5 13/13 57/24<br><b>months</b> [5] 10/24 10/25 11/4 | 30/21 49/4<br><b>more</b> [29] 4/18 5/25 17/7 18/19 21/5 21/12 32/8 32/9 32/10 32/15 34/24 34/24 36/3 36/3 36/4 40/13 40/15 43/19 52/14 61/23 62/6 62/18 63/18 64/2 65/6 67/11 67/24 68/3 68/13<br><b>Moreover</b> [2] 13/1 15/8<br><b>morning</b> [3] 3/4 61/23 62/17<br><b>most</b> [12] 5/13 10/15 25/11 31/23 31/24 32/2 33/22 42/18 44/22 48/14 64/24 68/9<br><b>mostly</b> [1] 9/15<br><b>motion</b> [6] 43/10 47/16 51/7 52/13 58/5 58/19<br><b>motions</b> [13] 4/16 9/22 44/23 45/3 45/4 45/19 48/19 50/20 51/17 53/2 55/5 56/15 59/1<br><b>move</b> [5] 31/7 43/7 43/19 53/1 54/4<br><b>moving</b> [3] 24/7 29/9 56/20<br><b>Mr</b> [76]<br><b>Ms</b> [24] 11/23 12/3 12/3 23/13 24/16 24/17 24/19 26/7 27/24 30/7 48/4 49/10 51/2 52/19 54/18 55/13 55/18 56/4 57/5 58/10 60/21 61/1 63/24 64/1<br><b>Ms.</b> [29] 11/17 11/23 12/15 18/2 19/17 19/25 21/10 26/10 26/14 26/25 28/4 28/22 30/12 30/21 31/15 32/24 47/22 50/7 54/13 54/15 55/1 55/6 55/10 55/22 57/10 57/13 60/25 62/23 63/3<br><b>Ms. Boldt</b> [2] 57/10 57/13<br><b>Ms. Finken</b> [4] 28/22 30/12 30/21 32/24<br><b>Ms. Goldenberg</b> [3] 47/22 50/7 54/13<br><b>Ms. Horne</b> [1] 26/10<br><b>Ms. Johnston</b> [4] 54/15 55/1 55/6 55/22<br><b>Ms. Johnston's</b> [1] 55/10<br><b>Ms. Luhana</b> [9] 11/17 11/23 12/15 18/2 19/17 21/10 26/14 26/25 28/4<br><b>Ms. Luhana's</b> [1] 19/25<br><b>Ms. Whiteley</b> [2] 60/25 62/23<br><b>Ms. Whiteley's</b> [1] 63/3<br><b>Ms. Y</b> [1] 31/15<br><b>much</b> [18] 4/18 7/9 8/11 23/11 23/21 26/7 28/20 32/10 32/24 40/13 40/15 41/23 44/11 47/2 56/3 62/24 65/15 66/13<br><b>multiple</b> [2] 31/4 33/22<br><b>must</b> [1] 41/18<br><b>mute</b> [1] 11/19<br><b>my</b> [10] 11/7 18/14 18/17 21/20 24/13 39/23 43/22 52/20 55/10 60/17 |
| <b>M</b><br><b>made</b> [5] 6/25 45/16 62/3 62/7 67/13<br><b>MAGISTRATE</b> [2] 1/10 12/17<br><b>mainly</b> [2] 29/15 62/1<br><b>maintain</b> [1] 58/8<br><b>majority</b> [1] 60/1<br><b>make</b> [17] 12/5 19/9 21/1 25/6 32/6 32/20 34/5 34/7 35/22 38/15 42/9 42/25 48/1 57/3 62/11 63/15 68/5<br><b>makes</b> [1] 36/7<br><b>making</b> [3] 7/15 26/3 31/17<br><b>management</b> [11] 4/21 10/6 10/20 19/6 37/9 45/18 50/19 51/1 51/14 68/7 69/5<br><b>managers</b> [2] 64/25 65/24<br><b>managing</b> [1] 66/22<br><b>manner</b> [1] 68/9<br><b>manufacturer</b> [1] 14/21<br><b>manufacturers</b> [1] 27/15<br><b>manufacturing</b> [2] 13/8 50/24<br><b>many</b> [9] 10/12 23/25 26/22 30/21 37/9 48/8 48/24 49/2 49/4<br><b>March</b> [2] 11/1 24/9<br><b>March 15th</b> [1] 24/9<br><b>MARK</b> [3] 2/14 16/11 64/6<br><b>market</b> [3] 13/17 14/19 21/25<br><b>marketing</b> [2] 13/9 29/20<br><b>MARLENE</b> [1] 2/10<br><b>Massachusetts</b> [1] 2/22<br><b>massive</b> [1] 23/9<br><b>master</b> [5] 7/23 10/8 10/19 18/11 68/24<br><b>materials</b> [3] 11/11 23/10 25/21<br><b>matter</b> [5] 4/6 20/1 20/23 43/13 69/17<br><b>matters</b> [7] 6/7 6/19 20/11 47/20 68/14 69/3 69/9<br><b>may</b> [24] 4/2 4/11 4/19 9/8 9/9 9/9 9/10 9/11 9/14 12/12 19/25 28/1 30/3 35/25 38/22 41/9 41/9 43/9 59/21 59/21 62/22 65/19 66/8 67/16<br><b>maybe</b> [12] 7/12 10/9 22/19 23/10 31/12 34/16 39/17 54/1 64/10 65/2 65/4 66/23<br><b>McGLAMRY</b> [12] 1/18 1/18 11/17 11/23 33/4 33/8 36/10 | <b>mean</b> [3] 46/4 53/14 68/6<br><b>meaningful</b> [1] 52/9<br><b>means</b> [1] 22/13<br><b>meant</b> [1] 12/12<br><b>meantime</b> [1] 24/10<br><b>measures</b> [1] 40/17<br><b>mechanics</b> [1] 34/2<br><b>mechanism</b> [3] 34/6 34/13 36/3<br><b>medical</b> [3] 25/23 61/6 61/10<br><b>meet</b> [36] 15/11 16/9 18/17 18/23 24/9 26/21 29/8 29/10 29/24 33/22 39/2 46/13 48/8 48/24 51/3 51/5 52/1 52/9 54/1 55/20 56/6 56/17 56/24 59/3 60/12 61/24 62/1 62/4 62/18 63/5 65/16 66/4 68/23 69/1 69/3 69/6<br><b>meet and</b> [1] 16/9<br><b>meeting</b> [6] 8/8 25/20 25/23 65/2 66/11 67/20<br><b>meetings</b> [1] 67/21<br><b>memorialized</b> [1] 47/12<br><b>memos</b> [1] 20/10<br><b>Mensey</b> [1] 16/17<br><b>mentioned</b> [3] 21/10 50/7 51/2<br><b>mere</b> [1] 15/25<br><b>met</b> [5] 14/7 18/24 18/25 30/13 54/25<br><b>Miami</b> [1] 1/24<br><b>MICHAEL</b> [1] 1/18<br><b>might</b> [6] 7/14 20/20 23/4 28/8 32/3 39/19<br><b>million</b> [3] 13/13 13/17 20/5<br><b>millions</b> [3] 17/11 17/12 22/14<br><b>mimic</b> [1] 55/13<br><b>mind</b> [2] 22/11 65/11<br><b>mindful</b> [1] 53/19<br><b>minds</b> [1] 8/8<br><b>Minneapolis</b> [1] 2/12<br><b>minutes</b> [2] 25/21 25/23<br><b>missing</b> [1] 27/11<br><b>mistaken</b> [2] 43/23 43/23<br><b>mitigate</b> [1] 39/4<br><b>MN</b> [1] 2/12<br><b>moment</b> [1] 35/14<br><b>monitor</b> [1] 69/7<br><b>monitoring</b> [1] 61/6<br><b>month</b> [5] 4/24 4/25 5/5 13/13 57/24<br><b>months</b> [5] 10/24 10/25 11/4  | <b>more</b> [29] 4/18 5/25 17/7 18/19 21/5 21/12 32/8 32/9 32/10 32/15 34/24 34/24 36/3 36/3 36/4 40/13 40/15 43/19 52/14 61/23 62/6 62/18 63/18 64/2 65/6 67/11 67/24 68/3 68/13<br><b>Moreover</b> [2] 13/1 15/8<br><b>morning</b> [3] 3/4 61/23 62/17<br><b>most</b> [12] 5/13 10/15 25/11 31/23 31/24 32/2 33/22 42/18 44/22 48/14 64/24 68/9<br><b>mostly</b> [1] 9/15<br><b>motion</b> [6] 43/10 47/16 51/7 52/13 58/5 58/19<br><b>motions</b> [13] 4/16 9/22 44/23 45/3 45/4 45/19 48/19 50/20 51/17 53/2 55/5 56/15 59/1<br><b>move</b> [5] 31/7 43/7 43/19 53/1 54/4<br><b>moving</b> [3] 24/7 29/9 56/20<br><b>Mr</b> [76]<br><b>Ms</b> [24] 11/23 12/3 12/3 23/13 24/16 24/17 24/19 26/7 27/24 30/7 48/4 49/10 51/2 52/19 54/18 55/13 55/18 56/4 57/5 58/10 60/21 61/1 63/24 64/1<br><b>Ms.</b> [29] 11/17 11/23 12/15 18/2 19/17 19/25 21/10 26/10 26/14 26/25 28/4 28/22 30/12 30/21 31/15 32/24 47/22 50/7 54/13 54/15 55/1 55/6 55/10 55/22 57/10 57/13 60/25 62/23 63/3<br><b>Ms. Boldt</b> [2] 57/10 57/13<br><b>Ms. Finken</b> [4] 28/22 30/12 30/21 32/24<br><b>Ms. Goldenberg</b> [3] 47/22 50/7 54/13<br><b>Ms. Horne</b> [1] 26/10<br><b>Ms. Johnston</b> [4] 54/15 55/1 55/6 55/22<br><b>Ms. Johnston's</b> [1] 55/10<br><b>Ms. Luhana</b> [9] 11/17 11/23 12/15 18/2 19/17 21/10 26/14 26/25 28/4<br><b>Ms. Luhana's</b> [1] 19/25<br><b>Ms. Whiteley</b> [2] 60/25 62/23<br><b>Ms. Whiteley's</b> [1] 63/3<br><b>Ms. Y</b> [1] 31/15<br><b>much</b> [18] 4/18 7/9 8/11 23/11 23/21 26/7 28/20 32/10 32/24 40/13 40/15 41/23 44/11 47/2 56/3 62/24 65/15 66/13<br><b>multiple</b> [2] 31/4 33/22<br><b>must</b> [1] 41/18<br><b>mute</b> [1] 11/19<br><b>my</b> [10] 11/7 18/14 18/17 21/20 24/13 39/23 43/22 52/20 55/10 60/17               |
|   |  | <b>N</b><br><b>name</b> [3] 13/9 42/23 63/19<br><b>named</b> [1] 63/14<br><b>names</b> [6] 14/8 22/22 22/23   |

|   |  |   |
|---|--|---|
| <p><b>N</b></p> <p><b>names...</b> [3] 30/13 30/19 35/18</p> <p><b>narrow</b> [1] 60/3</p> <p><b>narrowing</b> [1] 68/10</p> <p><b>nature</b> [2] 7/4 67/19</p> <p><b>NDA</b> [1] 21/22</p> <p><b>NDMA</b> [2] 25/15 25/22</p> <p><b>NE</b> [1] 1/19</p> <p><b>necessarily</b> [2] 9/14 21/5</p> <p><b>necessary</b> [3] 29/21 57/3 62/21</p> <p><b>need</b> [26] 6/24 7/1 9/1 26/16 29/17 30/3 30/19 31/5 31/6 31/13 32/18 32/23 38/24 39/9 48/15 51/12 54/10 60/5 60/13 60/18 60/19 62/14 66/6 66/21 67/16 68/9</p> <p><b>needed</b> [4] 40/20 42/21 45/14 69/9</p> <p><b>needs</b> [3] 25/6 26/4 42/6</p> <p><b>new</b> [13] 2/6 2/9 3/2 4/8 4/12 4/13 4/20 12/18 18/7 39/24 50/18 52/3 63/15</p> <p><b>news</b> [1] 33/7</p> <p><b>next</b> [20] 10/17 10/20 10/21 11/4 11/14 16/3 18/21 28/14 28/21 30/1 33/3 35/14 37/8 38/1 40/4 40/10 44/18 44/20 65/17 68/24</p> <p><b>Nice</b> [1] 56/10</p> <p><b>night</b> [1] 64/16</p> <p><b>nine</b> [1] 55/9</p> <p><b>no</b> [9] 1/3 21/15 37/22 47/14 58/25 59/8 62/23 63/25 68/13</p> <p><b>non</b> [1] 35/3</p> <p><b>non-brands</b> [1] 35/3</p> <p><b>nonbrand</b> [1] 47/20</p> <p><b>noncustodial</b> [8] 12/9 13/2 13/4 14/6 15/1 16/5 17/2 24/9</p> <p><b>noncustodial documents</b> [1] 15/1</p> <p><b>none</b> [2] 46/4 46/5</p> <p><b>nonparties</b> [1] 53/20</p> <p><b>nonparty</b> [1] 34/15</p> <p><b>not</b> [73]</p> <p><b>notably</b> [1] 64/24</p> <p><b>note</b> [1] 53/12</p> <p><b>noted</b> [1] 42/6</p> <p><b>nothing</b> [4] 46/2 47/7 59/8 65/9</p> <p><b>notice</b> [6] 48/23 50/23 52/6 59/8 59/9 59/10</p> <p><b>notices</b> [2] 34/8 48/25</p> <p><b>notify</b> [1] 43/14</p> <p><b>notifying</b> [2] 38/12 41/17</p> <p><b>notwithstanding</b> [1] 66/2</p> <p><b>November</b> [3] 61/13 61/16 61/17</p> <p><b>November 6th</b> [1] 61/17</p> <p><b>November we</b> [1] 61/13</p> <p><b>now</b> [15] 14/1 14/24 18/20 19/16 35/13 40/3 40/8 42/1 42/24 43/6 51/8 51/15 57/2 66/10 67/23</p> <p><b>number</b> [9] 6/20 9/1 20/2</p> | <p>20/4 21/14 21/18 21/18 29/25 42/18</p> <p><b>numbers</b> [6] 13/19 16/21 17/19 20/25 26/6 65/22</p> <p><b>NW</b> [2] 2/22 3/5</p> <p><b>NY</b> [2] 2/9 3/2</p> <p><b>O</b></p> <p><b>objection</b> [3] 53/21 53/24 54/3</p> <p><b>objections</b> [2] 53/22 62/7</p> <p><b>obligation</b> [1] 46/18</p> <p><b>obligations</b> [8] 19/24 46/13 46/14 48/11 50/4 50/13 50/17 51/24</p> <p><b>observation</b> [1] 30/25</p> <p><b>observations</b> [1] 18/13</p> <p><b>obviously</b> [6] 10/12 35/20 42/1 45/12 46/21 54/22</p> <p><b>occasions</b> [1] 55/1</p> <p><b>occurs</b> [1] 64/8</p> <p><b>October</b> [3] 61/8 61/13 61/16</p> <p><b>of research</b> [1] 14/17</p> <p><b>off</b> [5] 4/3 20/10 37/21 37/24 59/8</p> <p><b>offense</b> [1] 64/9</p> <p><b>offensive</b> [1] 66/9</p> <p><b>offered</b> [1] 49/2</p> <p><b>Official</b> [2] 3/15 69/20</p> <p><b>Okay</b> [2] 4/1 53/9</p> <p><b>old</b> [1] 52/5</p> <p><b>Once</b> [1] 8/14</p> <p><b>one</b> [45] 1/12 4/17 5/5 6/22 6/23 8/15 9/16 11/9 11/10 13/15 14/5 14/10 14/25 15/10 16/4 17/1 17/3 17/16 20/10 20/17 22/19 25/2 27/2 27/3 27/5 27/16 30/16 31/12 34/21 36/17 42/18 43/23 44/12 44/25 45/15 46/18 49/1 50/22 56/5 61/14 62/18 63/13 64/2 64/9 64/10</p> <p><b>one-off</b> [1] 20/10</p> <p><b>ones</b> [1] 25/17</p> <p><b>ongoing</b> [5] 42/10 49/24 50/1 58/5 67/20</p> <p><b>only</b> [18] 6/20 12/25 15/17 16/16 21/16 22/5 22/9 23/17 27/1 27/8 27/9 29/8 35/3 35/8 41/23 45/7 49/1 63/11</p> <p><b>open</b> [5] 7/13 26/22 32/14 32/16 68/20</p> <p><b>opened</b> [1] 57/23</p> <p><b>opening</b> [2] 11/7 23/16</p> <p><b>OpenText</b> [1] 17/14</p> <p><b>opportunity</b> [10] 5/2 5/20 12/8 17/23 33/11 41/13 44/5 47/25 48/2 57/9</p> <p><b>options</b> [1] 65/4</p> <p><b>order</b> [16] 4/17 6/12 13/14 19/4 44/25 45/1 45/15 45/21 46/20 47/12 47/12 48/14 51/25 52/24 58/8 66/2</p> <p><b>orderly</b> [1] 64/17</p> <p><b>orders</b> [24] 4/17 19/23 44/22 45/2 45/5 45/6 45/9 45/9 45/10 45/14 45/16 45/19 46/4 46/6 46/14 47/17 50/6 53/2</p> | <p>53/5 55/20 56/14 59/1 59/14 59/23</p> <p><b>Orleans</b> [1] 2/6</p> <p><b>Ostrow</b> [1] 1/22</p> <p><b>other</b> [25] 5/20 6/6 10/6 16/9 19/5 20/19 20/19 22/11 26/2 29/17 30/25 37/5 40/3 46/16 47/20 48/17 50/11 53/12 56/16 58/3 60/18 63/10 63/11 63/17 67/7</p> <p><b>others</b> [2] 32/8 58/20</p> <p><b>otherwise</b> [1] 62/8</p> <p><b>our</b> [68] 4/15 5/8 9/20 10/4 10/16 11/8 12/19 13/21 15/11 17/11 17/14 19/10 19/21 19/24 20/13 22/14 24/5 24/8 25/24 25/25 28/7 29/13 30/5 30/15 31/10 33/14 33/16 33/17 34/19 35/5 37/8 37/8 38/9 40/16 42/11 42/16 43/7 43/13 43/15 48/12 50/4 50/9 50/9 50/24 51/4 51/8 51/11 52/25 53/4 55/3 55/3 55/13 55/24 56/17 56/25 58/20 59/25 60/6 61/18 61/19 61/25 62/2 62/7 62/10 65/3 65/11 68/1 69/1</p> <p><b>ourselves</b> [1] 4/4</p> <p><b>out</b> [33] 6/17 6/19 10/24 11/2 13/1 18/12 18/20 19/4 23/17 28/5 28/13 33/12 34/22 35/9 36/2 36/23 36/23 37/19 37/22 39/3 39/6 39/7 40/17 41/2 41/21 43/24 44/3 45/1 45/6 46/5 67/15 68/7 69/3</p> <p><b>outlined</b> [2] 45/17 68/19</p> <p><b>outset</b> [3] 18/8 25/9 64/14</p> <p><b>over</b> [6] 5/14 11/13 24/13 35/5 39/22 47/19</p> <p><b>overly</b> [1] 52/12</p> <p><b>overwhelmingly</b> [1] 22/18</p> <p><b>own</b> [2] 24/14 30/5</p> <p><b>P</b></p> <p><b>P.C</b> [1] 1/18</p> <p><b>PA</b> [2] 1/13 2/20</p> <p><b>page</b> [2] 8/16 8/17</p> <p><b>pages</b> [11] 8/20 8/25 9/1 13/13 13/17 20/4 20/5 21/19 22/6 22/14 64/22</p> <p><b>PAIGE</b> [4] 2/1 2/21 25/9 57/17</p> <p><b>PALM</b> [3] 1/2 1/5 3/16</p> <p><b>Palmetto</b> [1] 2/15</p> <p><b>paper</b> [3] 19/2 27/10 28/10</p> <p><b>Park</b> [2] 2/15 3/11</p> <p><b>part</b> [2] 5/13 7/6</p> <p><b>participants</b> [1] 10/13</p> <p><b>participating</b> [2] 5/13 10/15</p> <p><b>particular</b> [3] 9/12 53/21 69/8</p> <p><b>particularly</b> [2] 33/18 46/3</p> <p><b>parties</b> [31] 5/1 5/9 5/21 6/8 6/14 6/16 6/18 7/23 8/13 12/12 12/14 15/1 32/12 33/21 38/17 44/9 45/17 46/12 46/15 46/22 46/24 47/6 47/9 53/12 53/17 54/1 54/4 54/10 66/19</p> |
|---|--|---|



|  |   |  |
|--|---|--|
| <b>P</b>   |   |  |
| <b>parties...</b> [2] 67/3 67/8  | <b>please</b> [4] 9/19 47/23 57/16 69/1   | 38/20 38/20 39/9 39/13 39/14   |
| <b>parts</b> [1] 33/24   | <b>pleasure</b> [1] 24/21   | 39/18 41/3 41/6 44/2 44/5  |
| <b>party</b> [12] 46/18 46/22 47/9 53/13 54/3 64/5 64/7 64/21 65/8 65/18 65/24 65/25 | <b>pled</b> [1] 60/9  | 54/24 56/17 56/19 56/20  |
| <b>passed</b> [1] 55/5   | <b>plenty</b> [1] 60/18   | 60/11 61/24 62/6 62/17   |
| <b>passing</b> [2] 20/4 43/6   | <b>PLLC</b> [2] 1/15 2/11   | <b>processes</b> [8] 26/15 28/17 28/18 28/19 42/5 44/10 46/24 69/10  |
| <b>past</b> [1] 31/7   | <b>point</b> [27] 4/3 25/2 25/2 25/6 27/4 39/6 40/14 40/16 40/18 40/21 41/6 45/25 48/12 48/24 49/1 49/5 50/12 50/22 52/4 52/11 52/13 53/1 53/7 54/22 64/18 66/9 66/12 | <b>produce</b> [8] 13/13 15/2 15/6 19/21 23/18 23/18 24/6 25/10  |
| <b>path</b> [1] 29/12  | <b>points</b> [2] 8/10 11/6   | <b>produce at</b> [1] 13/13  |
| <b>patience</b> [1] 61/3   | <b>Ponce</b> [1] 1/23   | <b>produced</b> [31] 12/25 13/16 13/22 14/4 14/24 15/4 15/6 15/8 16/3 16/7 16/25 17/3 17/7 17/8 17/12 20/2 20/5 20/12 25/4 25/12 25/14 25/16 25/19 25/20 25/22 26/6 27/5 27/9 42/15 64/22 66/1 |
| <b>Pauline</b> [2] 3/15 69/20  | <b>Pope</b> [1] 1/18  | <b>producing</b> [2] 58/21 65/19   |
| <b>payor</b> [1] 29/20   | <b>Porter</b> [2] 2/22 3/1  | <b>product</b> [17] 13/17 20/8 21/3 21/11 21/12 21/16 21/21 21/23 21/24 21/24 22/1 22/12 25/17 25/25 49/19 54/24 65/9  |
| <b>payors</b> [7] 64/5 64/7 64/21 65/8 65/19 65/24 66/1                              | <b>position</b> [14] 11/12 31/10 35/4 39/20 40/11 42/1 43/9 46/17 55/11 55/11 55/13 55/22 55/24 66/8  | <b>production</b> [25] 12/11 13/11 16/6 17/15 24/9 26/16 27/13 27/18 27/22 28/5 30/1 31/7 32/9 36/4 54/23 55/2 55/8 55/16 55/25 57/25 61/14 61/18 62/3 62/12 65/22                             |
| <b>PBMs</b> [3] 64/25 65/4 66/1  | <b>possession</b> [2] 61/20 61/21   | <b>production in</b> [1] 26/16   |
| <b>Peachtree</b> [1] 1/19  | <b>possible</b> [1] 56/2  | <b>productions</b> [18] 12/9 12/20 12/24 13/3 13/4 13/19 14/2 14/22 16/23 17/21 17/22 19/10 19/17 20/9 21/9 22/18 26/3 58/22   |
| <b>pencil</b> [1] 11/3   | <b>possibly</b> [1] 7/17  | <b>productive</b> [5] 4/20 5/9 48/8 67/5 68/18   |
| <b>pending</b> [3] 13/15 44/23 59/8  | <b>post</b> [1] 52/22   | <b>PRODUCTS</b> [1] 1/5  |
| <b>Pennsylvania</b> [1] 3/5  | <b>postpone</b> [1] 42/22   | <b>progress</b> [3] 7/11 57/3 67/13  |
| <b>people</b> [6] 22/7 22/24 29/14 34/17 34/20 35/15                                 | <b>potential</b> [3] 50/1 51/19 60/4  | <b>promoting</b> [2] 21/21 21/23   |
| <b>per</b> [6] 13/3 13/13 13/13 17/21 52/23 60/13                                    | <b>practical</b> [1] 37/5   | <b>promptly</b> [2] 38/12 41/17  |
| <b>percent</b> [1] 17/2  | <b>predecessor</b> [1] 25/18  | <b>proportional</b> [4] 52/3 52/10 59/19 60/8  |
| <b>perfect</b> [1] 9/1   | <b>preface</b> [1] 38/9   | <b>proposed</b> [2] 50/22 50/23  |
| <b>perhaps</b> [6] 5/23 8/5 10/10 45/8 67/15 67/23                                   | <b>prejudge</b> [1] 44/2  | <b>protective</b> [1] 66/2   |
| <b>period</b> [1] 62/2   | <b>prejudice</b> [2] 51/18 60/2   | <b>protocol</b> [1] 17/25  |
| <b>periods</b> [1] 65/7  | <b>prejudicial</b> [1] 41/5   | <b>proud</b> [1] 18/16   |
| <b>permissible</b> [1] 67/18   | <b>prepare</b> [3] 7/7 11/10 42/16  | <b>provide</b> [7] 17/20 34/21 35/15 35/16 42/3 57/21 62/15  |
| <b>permitted</b> [1] 53/1  | <b>prepared</b> [3] 9/5 11/12 67/12   | <b>provided</b> [6] 20/20 49/20 50/8 59/10 61/8 66/3   |
| <b>person</b> [2] 31/14 34/4   | <b>preparing</b> [2] 5/10 7/12  | <b>providers</b> [1] 61/10   |
| <b>perspective</b> [7] 20/1 20/23 25/8 30/16 33/14 47/7 63/6                         | <b>prescription</b> [1] 54/25   | <b>provides</b> [2] 6/14 68/15   |
| <b>pertinent</b> [2] 31/24 32/2  | <b>present</b> [4] 6/9 15/17 15/21 15/25  | <b>providing</b> [3] 11/8 33/10 58/5   |
| <b>Pfizer</b> [7] 13/5 16/25 16/25 18/24 21/10 21/10 21/15                           | <b>presentation</b> [1] 67/8  | <b>provision</b> [1] 53/23   |
| <b>Pfizer's</b> [1] 17/6   | <b>presented</b> [2] 7/19 67/12   | <b>provisions</b> [1] 65/25  |
| <b>pharmaceutical</b> [1] 59/13  | <b>presenters</b> [1] 64/18   | <b>PTO</b> [29] 6/12 12/10 13/3 15/5 16/24 17/21 17/25 18/18 26/19 29/5 34/2 34/16 35/13 39/9 45/17 46/25 49/18 49/19 50/5 50/5 50/14 50/14 52/21 53/8 54/11 56/21 57/20 60/11 60/17           |
| <b>pharmacies</b> [1] 61/10  | <b>presenting</b> [2] 10/13 27/2  | <b>PULASKI</b> [7] 1/15 1/15 54/15 54/20 56/4 56/5 56/23   |
| <b>pharmacovigilance</b> [2] 13/8 29/16  | <b>preside</b> [1] 5/14   | <b>pulling</b> [1] 23/16   |
| <b>pharmacy</b> [3] 56/9 64/25 65/23   | <b>presumably</b> [1] 53/15   | <b>purpose</b> [7] 5/16 5/18 6/10 8/2 33/12 33/13 38/10  |
| <b>phase</b> [3] 4/12 4/20 5/25  | <b>pretrial</b> [3] 6/12 46/6 50/6  |  |
| <b>Philadelphia</b> [2] 1/13 2/20  | <b>pretty</b> [2] 19/14 28/14   |  |
| <b>Phillip</b> [1] 16/14   | <b>previously</b> [2] 32/7 47/11  |  |
| <b>phon</b> [5] 14/17 15/19 15/23 16/14 16/17  | <b>primarily</b> [1] 33/20  |  |
| <b>pick</b> [2] 47/20 62/17  | <b>principle</b> [1] 31/21  |  |
| <b>pieces</b> [1] 37/16  | <b>prior</b> [2] 29/11 55/17  |  |
| <b>Pierce</b> [1] 3/16   | <b>prioritized</b> [1] 52/10  |  |
| <b>Pierce/West</b> [1] 3/16  | <b>privilege</b> [1] 28/7   |  |
| <b>place</b> [8] 6/12 35/17 36/18 41/22 46/5 46/9 46/24 68/18                        | <b>probably</b> [4] 22/24 25/8 30/23 45/13  |  |
| <b>Plaintiff</b> [4] 22/25 60/24 61/9 61/11  | <b>problem</b> [3] 31/25 42/22 42/24  |  |
| <b>Plaintiff's</b> [1] 31/25   | <b>problematic</b> [1] 41/4   |  |
| <b>PLAINTIFFS</b> [70]   | <b>procedure</b> [1] 53/21  |  |
| <b>Plaintiffs'</b> [9] 13/10 45/12 45/12 49/24 51/12 52/11 56/18 61/19 61/21         | <b>procedures</b> [5] 26/19 38/24 40/24 53/20 54/11   |  |
| <b>plan</b> [2] 11/5 36/17   | <b>proceed</b> [4] 45/25 48/18 48/20 67/25  |  |
| <b>play</b> [1] 44/2   | <b>proceeding</b> [2] 47/8 53/19  |  |
| <b>playing</b> [1] 64/9  | <b>proceedings</b> [1] 69/17  |  |
| <b>pleadings</b> [1] 53/4  | <b>process</b> [31] 6/3 6/13 7/15 23/12 23/12 26/17 28/8 29/11 29/24 30/3 30/17 31/17 32/13   |  |

|  |   |   |
|--|---|---|
| <b>P</b><br><b>purposes</b> [3] 5/20 38/18 42/9<br><b>pursuant</b> [9] 12/9 29/4 46/8<br>46/25 49/18 51/24 55/3 58/1<br>58/23<br><b>pursuing</b> [1] 50/16<br><b>pushing</b> [1] 28/13<br><b>put</b> [11] 9/5 9/11 9/15 11/2<br>11/11 30/2 40/6 43/16 49/7<br>69/4 69/5  | <b>record</b> [1] 69/17<br><b>records</b> [1] 54/25<br><b>recover</b> [1] 40/7<br><b>redaction</b> [1] 63/10<br><b>redactions</b> [4] 62/3 62/11<br>62/11 62/13<br><b>redactions and</b> [1] 62/11<br><b>reengage</b> [1] 52/8<br><b>refer</b> [1] 46/8<br><b>reference</b> [4] 20/4 21/1<br>60/17 64/24<br><b>referenced</b> [1] 56/12<br><b>reflect</b> [1] 10/16<br><b>regard</b> [8] 34/25 42/19 43/7<br>51/19 51/25 54/20 57/6 62/10<br><b>regarding</b> [6] 17/22 49/24<br>50/9 50/10 50/13 55/1<br><b>regardless</b> [1] 43/4<br><b>registry</b> [1] 54/23<br><b>regular</b> [1] 67/20<br><b>regulatory</b> [4] 13/7 25/14<br>29/15 50/10<br><b>reimbursing</b> [1] 65/9<br><b>REINHART</b> [17] 1/9 5/12 7/2<br>8/11 9/4 9/6 9/25 11/13<br>11/18 12/17 18/6 28/25 44/19<br>47/19 64/15 67/11 67/21<br><b>reiterate</b> [4] 7/1 7/5 32/12<br>36/19<br><b>reject</b> [1] 19/22<br><b>relate</b> [4] 20/7 23/4 24/1<br>46/20<br><b>related</b> [9] 13/7 14/19 25/16<br>25/20 46/21 50/24 50/25<br>57/22 58/17<br><b>relates</b> [7] 23/11 33/25 34/1<br>38/1 47/16 49/19 60/6<br><b>relating</b> [4] 12/1 22/3 46/6<br>65/25<br><b>relatively</b> [1] 19/4<br><b>relevance</b> [1] 25/11<br><b>relevant</b> [24] 13/6 14/9<br>14/11 15/12 15/13 15/16<br>15/20 15/24 16/10 16/13<br>16/15 16/18 23/19 25/7 27/17<br>29/14 31/24 43/25 44/1 52/2<br>52/12 59/19 60/8 62/2<br><b>relied</b> [1] 14/9<br><b>relief</b> [7] 6/10 6/15 7/3<br>9/23 17/24 46/23 69/9<br><b>relieved</b> [1] 46/18<br><b>remain</b> [3] 5/24 19/11 69/11<br><b>remaining</b> [3] 15/3 28/12<br>45/21<br><b>remains</b> [1] 50/18<br><b>remarks</b> [2] 11/7 12/6<br><b>remedial</b> [2] 39/3 40/17<br><b>remedies</b> [1] 42/5<br><b>remedy</b> [7] 26/18 28/19 39/10<br>39/12 43/10 44/6 44/8<br><b>remember</b> [1] 30/21<br><b>remind</b> [2] 5/16 17/14<br><b>render</b> [1] 7/3<br><b>repeatedly</b> [1] 21/2<br><b>replead</b> [2] 47/4 63/14<br><b>repleading</b> [3] 45/11 45/14<br>51/24<br><b>repled</b> [3] 47/5 47/6 47/7 | <b>report</b> [19] 8/17 8/17 9/16<br>12/14 12/19 13/21 26/14<br>26/23 33/24 35/2 40/22 42/3<br>43/11 47/24 47/25 54/20 63/3<br>63/22 65/10<br><b>reported</b> [2] 20/16 23/13<br><b>Reporter</b> [5] 3/15 49/15<br>57/15 69/20 69/21<br><b>reports</b> [2] 8/23 25/16<br><b>reports for</b> [1] 25/16<br><b>represent</b> [3] 16/23 58/13<br>61/5<br><b>representations</b> [1] 14/9<br><b>represented</b> [2] 12/22 13/2<br><b>request</b> [6] 32/8 39/7 41/14<br>47/11 59/6 59/7<br><b>requested</b> [1] 49/25<br><b>requests</b> [5] 32/16 32/21<br>52/11 61/14 62/19<br><b>required</b> [3] 13/12 15/5<br>62/12<br><b>requirements</b> [1] 60/14<br><b>research</b> [2] 14/14 14/17<br><b>resistance</b> [1] 65/2<br><b>resolution</b> [9] 6/6 6/14 9/22<br>26/20 29/25 46/24 56/21<br>66/19 67/17<br><b>resolve</b> [9] 6/23 7/3 39/10<br>56/24 60/20 62/5 62/10 63/9<br>69/9<br><b>resolved</b> [2] 7/2 40/23<br><b>respect</b> [8] 18/25 28/10<br>41/23 45/18 46/3 50/14 65/21<br>66/12<br><b>respecting</b> [1] 56/13<br><b>respective</b> [2] 37/19 44/9<br><b>respond</b> [3] 18/3 28/1 52/17<br><b>responding</b> [1] 61/15<br><b>response</b> [1] 35/19<br><b>responses</b> [2] 18/15 61/13<br><b>responsive</b> [4] 17/12 24/6<br>24/6 65/1<br><b>result</b> [3] 43/4 43/10 46/20<br><b>results</b> [1] 25/15<br><b>retailer</b> [1] 56/9<br><b>retailers</b> [5] 48/2 54/14<br>54/21 54/23 61/10<br><b>review</b> [11] 9/4 9/20 13/23<br>15/12 18/20 23/18 26/16 28/7<br>42/16 45/13 45/24<br><b>reviewed</b> [1] 28/12<br><b>reviewing</b> [3] 45/9 45/9<br>65/19<br><b>Richmond</b> [1] 1/16<br><b>right</b> [9] 4/5 40/8 40/25<br>42/1 42/21 44/19 51/15 57/23<br>66/10<br><b>rightly</b> [1] 41/9<br><b>ripe</b> [4] 65/10 66/5 66/6<br>66/10<br><b>rise</b> [1] 6/8<br><b>risen</b> [1] 6/21<br><b>Road</b> [3] 1/19 2/2 2/15<br><b>roadblocks</b> [1] 63/22<br><b>Robbins</b> [1] 2/14<br><b>ROBERT</b> [3] 1/21 14/13 38/4<br><b>ROBIN</b> [2] 1/8 3/15<br><b>robust</b> [1] 35/10 |
| <b>Q</b><br><b>QC</b> [1] 28/7<br><b>quality</b> [6] 13/9 16/18 25/4<br>27/13 51/1 51/1<br><b>quantity</b> [3] 13/11 25/5<br>27/13<br><b>quarter</b> [1] 35/23<br><b>quarters</b> [1] 28/12<br><b>question</b> [2] 27/20 68/13<br><b>questions</b> [6] 15/14 24/12<br>28/8 38/14 56/11 62/22<br><b>quick</b> [2] 20/3 23/3<br><b>quickly</b> [1] 31/24<br><b>quite</b> [8] 18/10 18/19 19/9<br>36/6 41/4 41/22 53/3 63/4<br><b>quo</b> [2] 46/11 58/9<br><b>quote</b> [1] 20/19  |   |   |
| <b>R</b><br><b>radar</b> [2] 30/2 43/16<br><b>raise</b> [4] 27/3 60/13 63/12<br>63/20<br><b>raised</b> [7] 17/10 33/18 56/5<br>59/3 59/6 65/21 65/24<br><b>raises</b> [1] 15/13<br><b>raising</b> [1] 66/24<br><b>RANITIDINE</b> [1] 1/4<br><b>rather</b> [1] 9/24<br><b>Raton</b> [1] 2/16<br><b>RE</b> [1] 1/4<br><b>reach</b> [3] 36/23 41/6 62/9<br><b>reached</b> [1] 46/7<br><b>reading</b> [2] 45/5 59/25<br><b>readout</b> [2] 20/12 20/16<br><b>ready</b> [3] 24/7 24/10 30/13<br><b>realize</b> [2] 38/11 43/9<br><b>really</b> [24] 5/19 8/6 9/1<br>18/22 19/5 19/7 19/25 24/2<br>29/13 31/1 31/13 31/17 31/19<br>33/10 36/18 38/19 40/4 40/14<br>51/12 54/7 56/21 67/2 67/21<br>67/24<br><b>reason</b> [1] 53/7<br><b>reasonable</b> [2] 31/6 31/15<br><b>recall</b> [7] 4/11 13/18 21/17<br>22/8 22/9 33/17 50/11<br><b>receipt</b> [1] 51/7<br><b>received</b> [7] 12/21 48/20<br>49/25 55/19 56/14 57/25<br>61/23<br><b>receiving</b> [1] 9/16<br><b>recent</b> [1] 22/3<br><b>recently</b> [1] 33/22<br><b>recognize</b> [6] 7/10 28/22<br>32/22 38/2 57/10 64/4<br><b>recognizing</b> [1] 45/15 |   |   |

|   |   |   |
|---|---|---|
| <b>R</b><br><b>rolling</b> [2] 61/19 62/12<br><b>ROOPAL</b> [2] 2/7 12/17<br><b>ROSENBERG</b> [21] 1/3 1/8 3/15<br>12/8 18/6 18/8 24/21 26/18<br>29/1 33/12 38/10 39/24 42/7<br>44/17 49/13 53/10 54/5 56/10<br>56/12 66/17 67/6<br><b>Rosenberg's</b> [4] 19/6 50/12<br>51/24 67/3<br><b>roughly</b> [1] 22/22<br><b>round</b> [4] 4/16 35/25 45/3<br>45/4<br><b>Rudman</b> [1] 2/14<br><b>Rule</b> [9] 38/21 38/23 38/25<br>43/25 44/1 53/15 53/15 53/20<br>53/23<br><b>rules</b> [2] 19/24 53/16<br><b>ruling</b> [5] 52/6 52/23 54/7<br>54/11 55/4<br><b>rulings</b> [3] 51/7 51/17 52/13<br><b>running</b> [2] 45/23 64/19 | 33/25 34/2 34/14 36/20 36/24<br><b>Scholer</b> [2] 2/22 3/1<br><b>scope</b> [7] 29/25 40/4 40/7<br>40/12 56/13 58/2 62/1<br><b>second</b> [5] 19/11 29/18 35/2<br>35/2 45/4<br><b>see</b> [21] 5/8 5/8 5/12 12/18<br>21/14 23/4 29/2 30/13 30/18<br>31/13 33/6 36/22 43/24 47/5<br>51/12 52/7 53/7 56/10 60/5<br>68/3 68/20<br><b>seeing</b> [9] 8/5 17/13 17/18<br>21/9 21/19 23/16 26/13 40/6<br>69/12<br><b>seek</b> [4] 6/10 6/15 17/24<br>30/4<br><b>seeking</b> [1] 9/23<br><b>seem</b> [1] 16/2<br><b>selecting</b> [1] 14/9<br><b>selling</b> [1] 21/10<br><b>send</b> [1] 48/22<br><b>senior</b> [1] 16/15<br><b>sense</b> [4] 21/1 36/8 39/19<br>49/21<br><b>sent</b> [1] 50/22<br><b>series</b> [1] 24/11<br><b>serve</b> [1] 34/7<br><b>served</b> [3] 61/13 61/17 64/10<br><b>set</b> [15] 8/14 9/18 10/11<br>10/14 10/22 10/23 17/25<br>18/12 33/12 34/21 46/5 50/6<br>55/15 61/14 68/7<br><b>sets</b> [1] 61/15<br><b>setting</b> [2] 12/13 34/18<br><b>seven</b> [1] 58/22<br><b>several</b> [3] 33/21 51/4 55/1<br><b>share</b> [4] 21/25 39/1 39/20<br>40/19<br><b>sharing</b> [2] 6/2 6/3<br><b>SHARPE</b> [6] 2/21 12/3 24/16<br>24/19 25/9 26/8<br><b>sharpening</b> [1] 68/11<br><b>she</b> [4] 28/9 30/22 53/10<br>63/4<br><b>ship</b> [1] 64/19<br><b>shooting</b> [1] 32/1<br><b>short</b> [2] 19/4 30/10<br><b>shortly</b> [1] 45/2<br><b>Shou</b> [1] 14/17<br><b>should</b> [21] 8/6 9/3 9/25<br>10/16 10/17 14/22 17/11 21/5<br>22/13 24/3 25/8 28/13 29/8<br>38/18 40/9 47/8 48/18 48/20<br>52/24 62/3 64/10<br><b>shouldn't</b> [1] 9/1<br><b>show</b> [2] 33/16 66/17<br><b>side</b> [9] 28/19 31/1 31/25<br>32/4 34/3 34/4 34/20 34/20<br>51/8<br><b>sides</b> [6] 26/15 28/17 28/18<br>36/8 37/19 68/9<br><b>sign</b> [1] 63/4<br><b>signal</b> [1] 25/24<br><b>Signature</b> [1] 69/21<br><b>signed</b> [1] 58/18<br><b>significant</b> [4] 22/3 60/4<br>63/21 65/17<br><b>similar</b> [5] 16/9 17/11 26/3 | 55/11 58/3<br><b>simply</b> [3] 16/1 17/9 22/15<br><b>since</b> [9] 4/13 21/23 24/3<br>33/20 34/3 43/13 47/24 58/25<br>61/22<br><b>single</b> [4] 8/22 8/24 8/25<br>20/19<br><b>sirens</b> [1] 24/23<br><b>sit</b> [1] 7/23<br><b>situated</b> [1] 21/8<br><b>situation</b> [3] 31/3 41/3<br>43/18<br><b>situations</b> [1] 38/24<br><b>six</b> [1] 17/4<br><b>size</b> [1] 19/17<br><b>slowed</b> [2] 23/21 23/21<br><b>so</b> [92]<br><b>sold</b> [1] 21/12<br><b>solution</b> [1] 40/20<br><b>Som</b> [1] 5/10<br><b>some</b> [47] 7/6 8/12 10/10<br>11/2 11/3 11/8 12/1 12/10<br>13/9 19/1 19/2 21/8 23/5<br>24/13 26/18 27/10 28/8 31/13<br>31/18 31/18 32/8 32/17 33/18<br>38/16 39/6 39/20 42/22 47/11<br>47/12 50/11 50/23 51/18<br>53/20 54/7 58/22 59/10 59/14<br>59/17 60/4 62/7 62/9 62/15<br>63/10 64/22 65/10 66/9 66/24<br><b>somebody</b> [4] 4/2 23/24 34/19<br>36/1<br><b>somehow</b> [1] 47/13<br><b>something</b> [6] 6/2 7/11 9/4<br>19/19 40/13 51/13<br><b>sometimes</b> [1] 41/3<br><b>somewhat</b> [2] 8/18 34/1<br><b>soon</b> [3] 43/18 56/1 63/9<br><b>SOP's</b> [1] 50/9<br><b>SOPs</b> [1] 13/8<br><b>sorry</b> [1] 49/15<br><b>sort</b> [10] 20/10 32/1 33/24<br>34/9 34/13 34/22 39/20 41/2<br>41/3 65/22<br><b>sorts</b> [3] 38/21 38/24 40/1<br><b>sounds</b> [2] 48/14 51/13<br><b>source</b> [1] 25/19<br><b>SOUTHERN</b> [1] 1/1<br><b>spaced</b> [3] 8/22 8/24 8/25<br><b>speak</b> [3] 49/21 55/12 55/12<br><b>speaker</b> [1] 65/14<br><b>speaking</b> [4] 50/3 50/15 55/6<br>59/17<br><b>speaks</b> [1] 13/11<br><b>special</b> [5] 7/23 10/8 10/19<br>18/11 68/24<br><b>specific</b> [14] 14/1 18/15<br>39/10 39/18 46/10 46/14<br>46/18 47/1 47/2 59/20 59/20<br>59/21 59/22 60/7<br><b>specifically</b> [6] 27/14 27/16<br>29/22 38/23 46/3 60/6<br><b>specificity</b> [1] 51/25<br><b>spirit</b> [1] 42/7<br><b>spoliation</b> [2] 43/4 43/11<br><b>spreads</b> [1] 34/22<br><b>spreadsheet</b> [1] 61/9<br><b>Square</b> [1] 1/12 |
|---|---|---|

|   |  |   |
|---|--|---|
| <p><b>S</b></p> <p><b>stability</b> [1] 14/15</p> <p><b>staff</b> [1] 18/7</p> <p><b>stagger</b> [1] 4/25</p> <p><b>stand</b> [1] 51/8</p> <p><b>standpoint</b> [3] 37/6 43/1 45/12</p> <p><b>star</b> [2] 33/16 37/2</p> <p><b>start</b> [11] 12/15 14/2 18/13 18/16 32/4 49/14 49/17 52/21 56/2 56/17 63/9</p> <p><b>started</b> [3] 29/10 45/23 57/1</p> <p><b>starting</b> [2] 61/6 61/25</p> <p><b>state</b> [1] 47/17</p> <p><b>stated</b> [3] 12/19 13/21 55/14</p> <p><b>STATES</b> [3] 1/1 1/9 1/10</p> <p><b>status</b> [31] 1/8 4/11 4/25 5/4 5/6 5/8 5/14 5/18 5/19 8/15 8/17 8/17 8/23 9/16 9/17 9/18 10/4 10/5 10/17 10/21 10/21 12/9 12/19 17/21 41/14 46/11 47/25 57/19 58/8 58/16 65/10</p> <p><b>stay</b> [2] 27/1 38/18</p> <p><b>staying</b> [1] 28/23</p> <p><b>steps</b> [2] 39/3 51/1</p> <p><b>stick</b> [2] 10/3 66/17</p> <p><b>sticking</b> [1] 67/3</p> <p><b>still</b> [8] 44/25 45/7 45/8 45/15 46/9 47/2 49/4 67/13</p> <p><b>Stipes</b> [2] 3/15 69/20</p> <p><b>stopped</b> [3] 21/10 21/20 21/23</p> <p><b>storage</b> [1] 13/8</p> <p><b>streamline</b> [1] 36/18</p> <p><b>Street</b> [5] 1/13 2/5 2/19 3/2 3/8</p> <p><b>strongly</b> [1] 68/23</p> <p><b>stuck</b> [1] 29/15</p> <p><b>subject</b> [3] 13/18 53/14 53/15</p> <p><b>subjects</b> [1] 59/11</p> <p><b>submission</b> [1] 64/25</p> <p><b>submissions</b> [1] 7/19</p> <p><b>submit</b> [1] 9/19</p> <p><b>submitted</b> [4] 8/23 8/23 55/16 55/25</p> <p><b>subpoena</b> [1] 53/25</p> <p><b>subsequent</b> [1] 53/16</p> <p><b>subsequently</b> [1] 13/24</p> <p><b>substance</b> [1] 26/5</p> <p><b>substantial</b> [5] 12/11 12/12 18/23 19/14 50/4</p> <p><b>substantially</b> [5] 12/23 15/9 16/23 27/20 61/7</p> <p><b>substantive</b> [1] 46/21</p> <p><b>subtopics</b> [1] 59/12</p> <p><b>such</b> [5] 27/17 34/16 46/10 47/4 63/19</p> <p><b>sue</b> [1] 51/22</p> <p><b>suggestion</b> [2] 19/18 32/6</p> <p><b>suggestions</b> [2] 7/14 68/20</p> <p><b>Suite</b> [8] 1/13 1/16 1/19 1/23 2/2 2/12 2/15 3/11</p> <p><b>summary</b> [1] 8/20</p> <p><b>summer</b> [2] 61/6 61/7</p> <p><b>supply</b> [1] 50/24</p> | <p><b>suppose</b> [1] 50/23</p> <p><b>supposed</b> [2] 4/4 27/5</p> <p><b>sure</b> [13] 20/17 31/18 32/20 34/5 34/7 42/9 42/25 45/5 45/6 48/1 54/22 55/17 63/15</p> <p><b>surprising</b> [8] 21/14 21/19 22/2 22/7 23/23 24/2 24/3 27/18</p> <p><b>suspect</b> [1] 9/15</p> <p><b>suspicion</b> [1] 32/2</p> <p><b>sweet</b> [1] 30/10</p> <p><b>T</b></p> <p><b>take</b> [17] 6/7 7/22 10/18 10/25 11/14 12/7 13/22 21/4 23/3 35/17 35/25 36/3 36/15 42/19 62/6 66/16 68/21</p> <p><b>taken</b> [5] 35/4 39/4 42/6 42/14 43/12</p> <p><b>taking</b> [4] 32/17 35/8 55/2 56/2</p> <p><b>talk</b> [5] 10/23 12/1 29/3 48/25 56/16</p> <p><b>talked</b> [5] 22/21 24/4 34/13 48/17 50/19</p> <p><b>talking</b> [6] 23/8 23/8 23/9 30/22 34/10 64/21</p> <p><b>task</b> [1] 19/15</p> <p><b>team</b> [1] 18/17</p> <p><b>tell</b> [4] 19/8 26/8 40/2 55/13</p> <p><b>ten</b> [2] 15/10 48/13</p> <p><b>tens</b> [1] 22/13</p> <p><b>terms</b> [8] 11/7 19/13 19/19 20/24 21/9 27/4 30/12 37/7</p> <p><b>test</b> [1] 25/15</p> <p><b>testing</b> [2] 14/15 14/20</p> <p><b>Tetris</b> [1] 37/15</p> <p><b>than</b> [15] 11/2 14/11 14/16 14/20 15/10 16/7 17/4 17/7 21/12 32/8 32/15 40/13 40/15 62/18 67/7</p> <p><b>thank</b> [57] 5/10 11/16 11/21 18/1 18/2 18/4 18/8 24/15 26/7 26/23 27/24 28/4 28/20 30/6 30/7 31/20 32/24 33/2 33/9 36/9 36/10 36/13 37/17 39/23 40/25 41/12 41/12 43/21 44/11 44/13 44/15 44/16 44/19 47/21 48/7 49/10 52/16 54/13 56/3 57/5 57/7 57/17 58/10 60/15 60/16 60/21 61/2 63/23 63/25 64/1 65/12 65/15 66/13 67/2 67/7 67/10 69/13</p> <p><b>Thanksgiving</b> [2] 42/16 42/21</p> <p><b>that</b> [448]</p> <p><b>that level</b> [1] 54/9</p> <p><b>that's</b> [3] 8/24 30/23 64/18</p> <p><b>the production</b> [1] 13/11</p> <p><b>their</b> [31] 4/2 4/3 11/25 12/24 13/2 16/7 17/18 18/15 21/12 24/14 26/15 28/18 34/20 35/21 36/22 44/5 44/9 45/10 46/13 47/23 48/1 48/11 48/18 49/22 50/23 54/10 55/21 55/22 61/5 61/7 67/8</p> <p><b>them</b> [28] 4/25 13/24 17/23</p> | <p>22/23 23/5 23/16 24/25 27/5 30/14 30/14 35/4 35/18 35/22 36/22 37/12 48/9 48/10 48/13 48/24 49/1 49/2 53/5 57/9 59/4 59/24 64/23 65/2 66/3</p> <p><b>then</b> [26] 5/4 11/3 13/24 15/17 17/23 18/14 21/20 33/20 35/8 39/1 39/5 39/11 40/11 40/22 43/23 43/25 46/21 52/1 52/8 56/6 60/7 61/15 61/22 61/24 69/5 69/9</p> <p><b>theories</b> [1] 51/19</p> <p><b>there</b> [72]</p> <p><b>thereafter</b> [1] 21/25</p> <p><b>Thereupon</b> [1] 69/14</p> <p><b>these</b> [39] 4/23 6/5 9/22 13/19 13/19 14/9 14/22 15/12 15/13 16/21 16/21 16/23 17/18 18/9 19/17 20/9 20/25 21/9 22/7 23/4 23/7 27/15 36/5 38/21 38/23 42/8 45/19 53/18 63/10 63/10 63/12 65/10 66/4 66/5 66/5 66/18 66/25 67/4 69/6</p> <p><b>they</b> [69] 5/15 6/5 6/19 8/17 8/25 9/3 9/23 9/24 12/3 12/23 13/2 15/6 15/9 20/17 21/1 21/11 21/12 22/7 22/9 22/22 22/22 24/13 26/3 27/7 30/13 31/25 32/1 32/2 32/3 34/7 35/22 37/13 39/6 39/7 39/12 41/21 42/21 44/4 44/6 44/6 44/7 45/4 45/25 48/11 48/13 48/15 48/18 49/3 49/3 49/6 49/25 50/22 52/2 52/3 52/6 54/2 55/19 58/4 61/11 62/8 63/14 63/15 64/21 65/7 65/8 65/9 65/24 66/8 66/20</p> <p><b>they will</b> [1] 44/6</p> <p><b>thing</b> [9] 19/5 22/11 33/14 37/5 53/12 63/11 63/17 63/20 68/16</p> <p><b>things</b> [11] 5/22 5/23 9/8 9/10 10/11 20/22 24/24 32/22 52/10 65/10 69/7</p> <p><b>think</b> [76]</p> <p><b>third</b> [9] 2/8 54/3 64/4 64/7 64/21 65/8 65/18 65/24 65/25</p> <p><b>this</b> [114]</p> <p><b>THOMAS</b> [2] 3/7 49/15</p> <p><b>Thornburg</b> [1] 3/10</p> <p><b>those</b> [43] 4/4 6/16 7/3 8/20 10/9 10/13 10/24 11/6 13/5 14/10 26/1 26/22 28/10 28/13 32/18 32/22 34/20 35/17 35/22 35/22 41/6 41/8 46/9 46/14 46/22 47/6 48/25 50/6 50/16 51/1 51/21 51/22 52/7 53/6 55/21 57/1 57/21 60/5 61/17 62/11 62/15 63/8 69/3</p> <p><b>though</b> [1] 66/17</p> <p><b>thought</b> [5] 4/19 19/9 22/24 23/1 63/3</p> <p><b>thousand</b> [1] 31/2</p> <p><b>thousands</b> [3] 20/20 20/21 20/21</p> <p><b>three</b> [4] 11/4 13/1 28/12 65/16</p> |
|---|--|---|

|  |  |   |
|--|--|---|
| <p><b>T</b></p> <p><b>three-quarters</b> [1] 28/12</p> <p><b>through</b> [15] 1/8 5/21 23/10 26/21 26/23 28/7 28/18 31/9 34/13 40/20 44/5 49/5 54/23 62/19 64/23</p> <p><b>throughout</b> [2] 55/6 61/22</p> <p><b>tight</b> [1] 64/19</p> <p><b>time</b> [30] 4/5 5/15 8/16 8/24 9/12 10/25 13/23 30/22 35/5 40/10 41/19 41/24 41/25 42/4 44/8 45/24 46/10 47/4 48/12 49/1 49/8 51/14 55/5 59/2 59/5 61/3 61/18 62/2 62/6 65/7</p> <p><b>timeframe</b> [2] 45/17 68/6</p> <p><b>timely</b> [3] 34/24 41/20 55/16</p> <p><b>times</b> [4] 10/20 31/4 65/8 69/8</p> <p><b>timing</b> [3] 30/1 43/22 43/24</p> <p><b>titled</b> [1] 38/2</p> <p><b>to as</b> [1] 46/8</p> <p><b>to assess</b> [1] 17/23</p> <p><b>to cede</b> [1] 18/15</p> <p><b>to turn</b> [1] 14/1</p> <p><b>today</b> [20] 5/7 8/10 8/13 18/9 28/5 33/16 38/18 38/19 40/15 41/8 48/6 52/23 58/13 58/15 59/3 59/17 60/23 61/3 66/8 68/17</p> <p><b>today's</b> [2] 5/11 38/13</p> <p><b>together</b> [5] 11/2 37/16 40/6 66/12 69/2</p> <p><b>told</b> [5] 27/6 28/11 40/3 42/21 67/25</p> <p><b>tomorrow</b> [3] 28/6 62/17 63/5</p> <p><b>too</b> [5] 30/11 35/8 41/15 55/19 56/10</p> <p><b>took</b> [3] 19/5 41/22 64/15</p> <p><b>tool</b> [3] 32/9 32/10 32/11</p> <p><b>toolbox</b> [1] 32/8</p> <p><b>tools</b> [2] 32/7 32/23</p> <p><b>topic</b> [9] 8/20 11/7 11/14 11/14 12/7 28/21 33/3 33/4 60/23</p> <p><b>topical</b> [1] 66/21</p> <p><b>topically</b> [1] 8/9</p> <p><b>topics</b> [4] 8/18 12/1 50/24 59/12</p> <p><b>total</b> [5] 12/25 13/5 15/2 17/17 23/14</p> <p><b>totally</b> [1] 33/12</p> <p><b>touch</b> [1] 59/11</p> <p><b>toward</b> [1] 12/10</p> <p><b>Tracey</b> [1] 29/1</p> <p><b>track</b> [2] 19/11 48/15</p> <p><b>TRACY</b> [1] 1/11</p> <p><b>tranche</b> [15] 12/23 14/5 14/10 14/25 15/10 16/4 17/1 27/5 28/21 29/4 29/5 29/7 29/8 29/13 29/18</p> <p><b>tranches</b> [1] 29/9</p> <p><b>transcript</b> [1] 69/16</p> <p><b>transfer</b> [1] 4/15</p> <p><b>transferred</b> [1] 53/24</p> <p><b>transit</b> [1] 48/5</p> <p><b>translate</b> [1] 21/5</p> | <p><b>transparent</b> [2] 38/13 39/2</p> <p><b>transport</b> [1] 13/8</p> <p><b>trials</b> [1] 68/1</p> <p><b>tribute</b> [1] 6/22</p> <p><b>tried</b> [1] 29/13</p> <p><b>trouble</b> [1] 56/25</p> <p><b>true</b> [2] 22/15 30/23</p> <p><b>Trust</b> [1] 60/18</p> <p><b>try</b> [18] 4/20 5/7 5/14 6/23 7/9 10/14 10/23 11/20 18/17 26/19 36/23 37/13 39/3 39/6 39/7 52/8 54/4 68/20</p> <p><b>trying</b> [5] 19/20 31/9 35/7 37/15 65/1</p> <p><b>turn</b> [24] 4/3 11/13 11/25 14/1 14/24 16/3 18/3 19/16 24/13 28/21 37/21 37/24 39/16 39/22 41/1 47/19 47/22 48/4 54/14 56/4 57/8 58/11 60/24 65/13</p> <p><b>turned</b> [1] 23/17</p> <p><b>turns</b> [1] 43/24</p> <p><b>two</b> [17] 5/3 5/4 5/4 8/16 8/17 8/20 8/25 13/22 17/16 22/19 28/22 29/4 31/12 33/24 56/5 59/7 69/2</p> <p><b>two-page</b> [2] 8/16 8/17</p> <p><b>TX</b> [2] 1/16 2/3</p> <p><b>type</b> [1] 17/24</p> <p><b>types</b> [2] 29/16 29/20</p> <p><b>typical</b> [1] 17/15</p> <p><b>typically</b> [2] 17/16 59/17</p> <p><b>U</b></p> <p><b>U.S</b> [2] 14/17 22/1</p> <p><b>UK</b> [1] 28/11</p> <p><b>ultimately</b> [6] 9/6 9/25 33/22 39/9 43/5 67/16</p> <p><b>unable</b> [1] 6/16</p> <p><b>unclear</b> [1] 68/2</p> <p><b>under</b> [16] 4/18 13/16 19/24 38/25 48/10 50/5 51/22 53/15 53/20 53/23 53/23 54/11 56/21 57/20 58/21</p> <p><b>underlying</b> [1] 25/19</p> <p><b>understand</b> [14] 16/22 17/9 26/2 34/10 35/3 38/14 38/15 40/4 40/11 41/3 41/9 44/21 49/23 60/6</p> <p><b>understanding</b> [9] 9/20 29/7 31/6 46/19 48/12 52/20 52/25 53/6 55/10</p> <p><b>understood</b> [1] 23/6</p> <p><b>undertaking</b> [3] 6/23 7/13 45/13</p> <p><b>underway</b> [2] 45/7 54/23</p> <p><b>undisclosed</b> [1] 42/22</p> <p><b>unfolding</b> [1] 43/18</p> <p><b>unfounded</b> [1] 62/8</p> <p><b>unified</b> [1] 54/5</p> <p><b>UNITED</b> [3] 1/1 1/9 1/10</p> <p><b>unless</b> [1] 24/12</p> <p><b>unresponded</b> [1] 41/17</p> <p><b>until</b> [10] 14/22 32/4 37/3 37/3 43/11 46/10 47/4 52/7 58/24 68/1</p> <p><b>unusual</b> [1] 14/21</p> <p><b>unwilling</b> [1] 49/7</p> | <p><b>up</b> [21] 8/10 12/7 17/21 21/1 21/21 23/13 23/14 23/16 24/10 27/6 28/11 34/18 35/25 37/11 38/9 47/20 48/9 49/7 62/17 63/15 65/6</p> <p><b>update</b> [8] 10/9 13/24 17/21 39/17 40/1 48/22 57/19 58/16</p> <p><b>updated</b> [1] 27/14</p> <p><b>upon</b> [5] 34/6 43/2 43/7 47/9 59/11</p> <p><b>urging</b> [1] 43/15</p> <p><b>us</b> [37] 8/12 8/20 12/14 15/12 16/10 17/15 18/9 19/15 19/19 22/22 27/6 30/14 30/20 33/5 33/11 35/16 36/7 37/10 37/13 41/17 41/23 42/3 42/16 42/19 42/21 48/10 49/2 51/15 52/6 52/21 61/3 66/17 66/23 67/12 68/3 68/15 69/7</p> <p><b>us at</b> [1] 41/23</p> <p><b>use</b> [1] 60/17</p> <p><b>user</b> [1] 7/16</p> <p><b>utilizing</b> [1] 40/23</p> <p><b>V</b></p> <p><b>vacuum</b> [1] 26/6</p> <p><b>valuable</b> [1] 32/22</p> <p><b>variety</b> [1] 29/17</p> <p><b>various</b> [2] 44/22 51/6</p> <p><b>vast</b> [1] 60/1</p> <p><b>vendor</b> [2] 17/15 61/20</p> <p><b>versus</b> [1] 36/1</p> <p><b>very</b> [35] 8/11 18/16 26/7 26/24 28/16 28/20 29/3 29/4 32/9 32/10 32/24 35/10 37/7 38/8 44/11 45/16 47/2 47/2 49/8 50/3 50/12 53/3 56/3 56/23 59/23 62/24 62/24 63/3 64/16 64/18 65/15 66/13 67/5 67/8 68/5</p> <p><b>victory</b> [1] 36/16</p> <p><b>video</b> [2] 4/2 4/3</p> <p><b>view</b> [3] 6/2 32/7 51/11</p> <p><b>virtually</b> [1] 68/3</p> <p><b>vision</b> [7] 5/17 11/8 11/10 18/9 18/12 66/18 67/3</p> <p><b>volume</b> [2] 63/7 63/7</p> <p><b>volumes</b> [1] 13/12</p> <p><b>voluntary</b> [1] 22/8</p> <p><b>W</b></p> <p><b>wait</b> [1] 42/2</p> <p><b>want</b> [41] 4/7 5/16 7/1 7/10 8/6 9/9 10/23 10/24 11/1 12/3 16/3 17/14 18/6 18/8 18/14 18/16 19/13 19/16 24/13 26/25 27/12 31/1 31/3 32/12 32/20 38/8 38/11 41/7 42/7 42/9 42/25 52/2 54/2 55/11 55/15 57/9 60/5 60/6 60/16 64/14 66/8</p> <p><b>wanted</b> [18] 7/5 10/2 11/6 17/20 25/2 25/6 26/4 27/3 29/3 30/2 31/19 44/18 47/15 48/1 49/5 56/7 67/7 67/7</p> <p><b>wants</b> [1] 31/23</p> <p><b>warehouses</b> [1] 23/15</p> <p><b>was</b> [46] 5/19 5/20 7/6 8/22</p> |
|--|--|---|

|  |  |   |
|--|--|---|
| <p><b>W</b></p> <p><b>was...</b> [42] 8/25 13/17 14/19<br/>15/5 16/12 17/6 18/10 20/1<br/>20/3 20/3 20/15 23/1 23/17<br/>25/4 35/8 35/9 35/12 35/13<br/>38/23 41/20 41/20 42/13<br/>42/18 42/20 42/23 43/13<br/>43/16 50/7 52/24 55/20 56/15<br/>58/17 58/18 59/5 59/6 59/16<br/>59/25 60/8 62/23 63/4 64/15<br/>64/24</p> <p><b>Washington</b> [2] 2/23 3/5</p> <p><b>Watts</b> [2] 2/1 57/18</p> <p><b>way</b> [11] 4/18 8/17 10/20<br/>11/4 11/20 39/2 44/2 59/11<br/>67/24 68/8 68/25</p> <p><b>ways</b> [1] 22/12</p> <p><b>we</b> [377]</p> <p><b>we'll</b> [4] 4/3 23/3 23/7<br/>63/20</p> <p><b>we're</b> [1] 17/13</p> <p><b>we've</b> [3] 18/25 34/9 35/16</p> <p><b>week</b> [16] 7/21 8/14 10/7<br/>10/17 18/21 18/21 19/11<br/>26/16 28/14 28/14 37/10<br/>50/20 57/2 58/4 58/6 65/17</p> <p><b>weekend</b> [1] 56/15</p> <p><b>weeks</b> [9] 5/3 5/4 5/4 13/22<br/>37/9 40/15 62/20 69/2 69/12</p> <p><b>Weiselberg</b> [1] 1/22</p> <p><b>Weiss</b> [1] 1/12</p> <p><b>welcome</b> [6] 4/6 11/17 11/23<br/>12/4 26/19 27/1</p> <p><b>well</b> [30] 4/9 4/18 6/19 7/12<br/>8/11 11/8 19/3 22/25 24/21<br/>25/1 28/16 29/19 30/1 31/4<br/>31/23 34/15 38/8 41/25 45/4<br/>48/3 49/25 50/11 51/5 55/2<br/>56/16 56/20 60/8 66/11 67/14<br/>69/11</p> <p><b>went</b> [1] 28/7</p> <p><b>were</b> [34] 8/23 8/24 10/3<br/>11/6 12/10 13/22 19/9 22/23<br/>22/24 27/5 27/6 29/5 29/14<br/>30/17 30/21 35/7 42/15 45/4<br/>48/5 48/5 55/4 58/4 59/13<br/>59/23 59/23 60/1 61/17 61/19<br/>61/21 62/5 62/6 62/8 64/16<br/>65/9</p> <p><b>WEST</b> [4] 1/2 1/5 3/2 3/16</p> <p><b>what</b> [89]</p> <p><b>whatever</b> [1] 9/18</p> <p><b>Wheelan</b> [1] 15/23</p> <p><b>when</b> [22] 6/15 22/5 22/21<br/>23/7 23/15 23/23 24/4 27/14<br/>30/21 31/7 33/6 34/5 35/21<br/>39/19 41/21 43/24 45/6 58/2<br/>59/16 63/14 64/15 69/9</p> <p><b>where</b> [22] 6/3 7/3 8/4 11/4<br/>16/10 20/14 22/17 24/24<br/>30/17 31/3 36/3 38/20 39/15<br/>39/17 40/22 41/6 42/2 48/5<br/>48/15 51/8 67/12 67/21</p> <p><b>whether</b> [13] 10/23 40/12<br/>40/13 43/4 46/13 46/16 48/10<br/>48/17 52/2 52/10 54/2 59/19<br/>68/2</p> | <p><b>which</b> [26] 5/5 25/14 28/6<br/>28/21 35/2 42/4 45/17 47/1<br/>47/6 49/19 51/12 53/25 55/8<br/>59/10 61/21 65/8 65/19 65/19<br/>66/8 66/24 67/14 67/14 67/15<br/>67/17 67/17 67/22</p> <p><b>while</b> [3] 26/1 53/3 55/24</p> <p><b>whip</b> [1] 36/1</p> <p><b>WHITELEY</b> [7] 2/4 2/5 60/25<br/>61/1 62/23 63/24 64/2</p> <p><b>Whiteley's</b> [1] 63/3</p> <p><b>who</b> [27] 4/4 10/13 11/13<br/>14/7 14/14 14/18 15/16 15/20<br/>15/24 16/12 16/15 16/18<br/>16/22 18/17 22/5 22/18 22/20<br/>23/24 27/15 27/17 40/5 49/23<br/>51/21 54/6 55/19 64/10 67/12</p> <p><b>whole</b> [2] 31/21 56/25</p> <p><b>why</b> [4] 22/25 42/20 62/7<br/>62/7</p> <p><b>will</b> [115]</p> <p><b>willing</b> [2] 49/3 49/4</p> <p><b>window</b> [3] 57/21 57/22 60/3</p> <p><b>winnowing</b> [1] 68/10</p> <p><b>wish</b> [2] 4/7 18/7</p> <p><b>withdrawal</b> [1] 14/19</p> <p><b>withholding</b> [1] 19/20</p> <p><b>within</b> [5] 35/14 35/18 35/23<br/>58/21 59/7</p> <p><b>without</b> [2] 40/23 56/25</p> <p><b>witness</b> [3] 37/2 37/2 37/3</p> <p><b>witnesses</b> [10] 29/16 29/18<br/>34/15 35/22 36/20 36/23 37/1<br/>37/13 42/12 49/7</p> <p><b>won't</b> [1] 9/23</p> <p><b>word</b> [2] 33/6 34/22</p> <p><b>words</b> [3] 5/20 6/6 10/6</p> <p><b>work</b> [29] 6/16 6/22 7/11<br/>9/17 18/11 18/22 27/16 30/14<br/>36/8 36/21 36/22 37/12 37/13<br/>37/16 40/8 40/9 40/20 44/9<br/>49/17 50/8 58/7 59/8 60/18<br/>64/23 65/3 65/5 67/13 67/15<br/>68/5</p> <p><b>worked</b> [8] 14/15 15/16 15/21<br/>15/24 18/17 26/23 36/2 50/3</p> <p><b>working</b> [19] 5/22 6/19 6/23<br/>9/24 19/22 19/23 25/10 32/16<br/>36/6 37/19 40/9 40/16 49/4<br/>55/21 66/11 67/23 68/5 68/6<br/>68/8</p> <p><b>works</b> [2] 36/24 68/20</p> <p><b>world</b> [1] 52/22</p> <p><b>worldwide</b> [1] 13/18</p> <p><b>worried</b> [1] 64/15</p> <p><b>worth</b> [1] 23/10</p> <p><b>would</b> [75]</p> <p><b>written</b> [1] 46/16</p> <p><b>wrong</b> [1] 19/19</p> | <p><b>years</b> [6] 13/18 17/16 21/17<br/>22/10 23/24 39/24</p> <p><b>yes</b> [3] 28/3 48/7 52/19</p> <p><b>yet</b> [6] 34/24 45/23 51/20<br/>55/22 55/25 66/5</p> <p><b>YOO</b> [8] 3/7 47/22 48/16<br/>49/11 49/15 52/16 54/13<br/>59/16</p> <p><b>Yoo's</b> [1] 55/11</p> <p><b>York</b> [2] 2/9 3/2</p> <p><b>you</b> [235]</p> <p><b>you some</b> [1] 66/24</p> <p><b>your</b> [57] 6/24 8/10 10/11<br/>10/18 12/16 18/4 18/7 24/18<br/>24/20 26/11 28/1 30/2 30/4<br/>30/9 32/8 32/13 33/2 33/9<br/>33/10 33/17 35/6 36/9 36/13<br/>37/18 37/21 37/24 38/4 38/6<br/>39/23 39/24 40/1 40/2 41/12<br/>41/14 41/16 41/16 42/1 44/16<br/>48/7 48/19 49/12 52/14 52/17<br/>52/20 52/23 54/16 56/8 57/15<br/>57/17 58/12 60/10 60/20 61/2<br/>61/3 63/1 63/25 64/6</p> <p><b>yourselves</b> [1] 68/7</p> <p><b>Yu</b> [1] 14/17</p> |
|  | <p><b>X</b></p> <p><b>Xarelto</b> [3] 13/12 21/2 21/2</p>  | <p><b>Z</b></p> <p><b>Z's</b> [2] 31/5 31/5</p> <p><b>ZANTAC</b> [19] 1/4 4/6 4/11<br/>8/24 9/3 9/19 14/20 14/21<br/>15/17 15/21 15/24 17/6 21/3<br/>22/4 22/10 23/11 24/1 25/14<br/>27/16</p> <p><b>Zantac's</b> [1] 14/15</p> <p><b>Zoom</b> [2] 1/8 67/24</p>  |
|  | <p><b>Y</b></p> <p><b>year</b> [16] 4/8 4/13 4/13 10/4<br/>10/10 12/18 13/16 18/7 20/8<br/>22/13 24/4 35/6 35/23 44/22<br/>45/7 52/22</p>  |   |