

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

CASE NO. 20-md-02924-ROSENBERG

IN RE: ZANTAC (RANITIDINE) .
PRODUCTS LIABILITY . West Palm Beach, FL
LITIGATION. . June 21, 2021
. .
. .

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

FOR THE PLAINTIFFS: **TRACY A. FINKEN, ESQ.**
Anapol Weiss
One Logan Square
130 N. 18th Street Suite 1600
Philadelphia, PA 19103
215-735-1130

ROOPAL P. LUHANA, ESQ.
Chaffin Luhana LLP
600 Third Avenue 12th Floor
New York, NY 10016
888-480-1113

MIKAL C. WATTS, ESQ.
Watts Guerra LLP
4 Domain Drive
Bldg 3 Suite 100
San Antonio, TX 78257
210-447-0500

FOR THE DEFENDANTS: **WILL SACHSE, ESQ.**
Dechert LLP
Cira Centre
2929 Arch Street
Philadelphia, PA 19104
215-994-4000

MICHAEL B. SHORTNACY, ESQ.

King & Spalding LLP

1180 Peachtree Street Suite 1600

Atlanta, GA 30309

404-572-4600

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

1 *THE COURT:* Let me call the case. This is Case Number
2 2924, In re: Zantac (Ranitidine) Product Liability Litigation.
3 We are here this afternoon for a status conference on a couple
4 of notices that were filed pursuant to pending discovery
5 matters relating to the brand Defendants.

6 Let me begin by having counsel make their appearances.
7 I'll start with counsel for the Plaintiffs.

8 *MS. LUHANA:* Roopal Luhana for the Plaintiffs.

9 *MS. FINKEN:* Tracy Finken on behalf of Plaintiffs.

10 *THE COURT:* Good afternoon.

11 *MR. WATTS:* Mikal Watts for the Plaintiffs.

12 *THE COURT:* Good afternoon, Mr. Watts. On behalf of
13 BI.

14 *MR. SHORTNACY:* Michael Shortnacy from King and
15 Spalding, your Honor. Good afternoon.

16 *THE COURT:* Good afternoon. And on behalf of GSK.

17 *MR. SACHSE:* Will Sachse from Dechert on behalf of
18 GSK. Good afternoon.

19 *THE COURT:* Good afternoon to all of you.

20 I am going to take up the BI portion first, so, Mr.
21 Sachse, you are free to leave your screen on or off, whatever
22 is easier for you.

23 I reviewed the notices that were submitted and I am
24 trying to understand what the disagreement is. It seemed to
25 me, and maybe I am reading these wrong, that the disagreement

1 was that BI may have some records that are in electronic format
2 that the Plaintiffs want and there is some disagreement about
3 whether the Plaintiffs should get them. If I could distill
4 down everything I read into one sentence, that is kind of what
5 I understood what was going on here.

6 Mr. Watts, maybe I can turn to you first. Tell me
7 from your perspective what is going on that I need to know.

8 MR. WATTS: Yes, sir, thank you. Greetings from
9 Brussels.

10 The basic dispute is whether BI needs to produce the
11 electronic analytical testing data that they conducted on
12 Ranitidine electronically, or to take from their electronic
13 database and print it out, often in Spanish language, and
14 produce in Spanish tens of thousands of pages of Spanish pdf's.

15 The bottom line is -- I have seen this Court address
16 the burdens of production and the new proportionality rule many
17 times. I would submit to the Court, respectfully, it is a
18 reciprocal rule that has just been added to the Federal rules.

19 I have about 50 people in my office in Puerto Rico
20 that have been reading Spanish language documents in pdf
21 format, and it is the height of -- it is just the height of
22 work over nothing.

23 The bottom line is, the way I see it, is that BI has
24 this available in electronic format for two reasons. Number
25 one, before 2017, BI had a partner in Germany known as

1 Boehringer Ingelheim, so BI Promeco, who has all this data, was
2 electronically communicating with this data to Boehringer
3 Ingelheim in Ingelheim, Germany. After Sanofi bought the
4 molecule from BI at the end of 2016, that same communication
5 was gotten from Promeco, Mexico, which is in Mexico City, with
6 respect to this testing to Sanofi in France.

7 I think the starting point is that this Defendant
8 maintains this data in electronic format and communicates with
9 its partners, first BI and then Sanofi in electronic format.
10 What has been happening is, Mr. Shortnacy and BI, who are my
11 great friends and I don't mean to suggest anything untoward
12 about what is happening, is they are pdf'ing this in Spanish,
13 providing it to me because I think I am the only Puerto Rico
14 office here.

15 I have 30 or 40 people reading tens of thousands of
16 pages in Spanish documents looking for the needle in the
17 haystack with respect to this analytical testing data that we
18 all know they maintain in electronic format.

19 If they produce it in the electronic format, under the
20 proportionality and burden rules that this Court has often
21 cited, the burden is reduced by hundreds of times.

22 Now, you know, Tracy Finken is happy to allow me to
23 have 50 people reading documents ad nauseam for months and
24 months and months, and I suppose in terms of my relative
25 allocation of common benefit it might be good for the Watts

1 Guerra law firm, but it is a complete and total waste of time
2 what we are being asked to do.

3 *THE COURT:* If I could stop you for a second. I
4 understand the burden argument, but before I get to the burden
5 argument, I want to understand. When you say the analytical
6 testing data records, I know in the past when I have talked to
7 Ms. Luhana, we have talked about what she and Mr. Shortnacy
8 have called batch records.

9 So, we are talking about the same thing, and the only
10 question is, BI is producing it to you in hard copy and you
11 believe that they have it in electronic, and if they have it in
12 electronic, you want it in the electronic format.

13 *MR. WATTS:* Yes, sir, and I have three bases for that.
14 Number one is the deposition I took of Torsten Mau on Friday,
15 who was the plant manager for BI Promeco from 2010 to 2014, and
16 then in effect the global quality executive for BI after that.

17 Tomorrow I take the deposition of Beate Scheidweiller,
18 who was the quality liaison between Germany and Promeco. And
19 Thursday I take the deposition of Susanne Thomsen, who was in
20 effect -- after the acquisition of the molecule from BI to
21 Sanofi, she was the liaison with Sanofi.

22 I would tell the Court, if you want to rule today it
23 is one thing, but if you want me to show up with deposition
24 transcripts to show you, it is already in my outline, I have
25 the documents, tomorrow we will be with Scheidweiller, Thursday

1 will be with Thomsen. By the end of the week I can point you
2 to page and lines about the only way that BI Promeco
3 communicated, first with BI before 2017, and then with Sanofi
4 after 2017, is through an electronic transfer of these records.

5 We just want them in the same format that they were
6 maintained by BI Promeco instead of producing them with a
7 printout to pdf's, which makes my office in Puerto Rico spend
8 thousands -- or tens of thousands of hours reading documents
9 which they could electronically upload to us.

10 *THE COURT:* Okay. I understand the ask. I will come
11 back to you.

12 Ms. Luhana, I didn't mean to jump over you, I was just
13 told by the special master that Mr. Watts was going to go
14 first, but I am happy to hear anything that you want to add to
15 supplement Mr. Watts and then I will turn to Mr. Shortnacy.

16 *MS. LUHANA:* I just wanted to give you the backdrop of
17 what has transpired to date.

18 *THE COURT:* Before we get to that, maybe I can short
19 circuit this.

20 Mr. Shortnacy, do you disagree with the underlying
21 premise here, which is that there are documents in electronic
22 format that could be produced in electronic format, but are not
23 being produced in electronic format?

24 *MR. SHORTNACY:* Yes and no, your Honor. I will say
25 this is the first time I am hearing of this from Mr. Watts,

1 this specific issue was not raised previously. Let me respond
2 and try to explain what I think he is saying.

3 The batch records themselves are more than
4 chromatograms. That is what I think Mr. Watts is asking about.
5 The batch records, if he just levels that back to what they
6 are, they represent all forms of analytical testing on a given
7 batch, and we talked before, your Honor, about the different
8 process points from compression to coding to packaging of the
9 tablets, so it is a complete package.

10 Those records are stored as the official record for
11 the batch and paper, and so those -- BI undertook at great cost
12 to effectively digitize those records and produce them
13 compliant with the PTO for ESI. We hired a vendor to not only
14 scan the records, but also associate the folders together and
15 type in the titles to explain what the files are so that you
16 would be seeing the documents as though you were looking at
17 them in their original form. You would have all of the
18 association for the binders and the clips and the envelopes and
19 the bags.

20 So, all of that is being done. I don't understand
21 what Mr. Watts is saying, that we, BI, are scanning things to
22 pdf on purpose.

23 What I think he is asking about, your Honor, is
24 chromatogram data, which is effectively, in part, the peaks
25 that are taken from sophisticated machinery and also tabular

1 data which has the numerical values from the testing that was
2 performed, those are included in the batch records and are in
3 paper format.

4 I think what Mr. Watts is getting at is something
5 completely separate from what is in the batch records. It is,
6 in effect, asking for the source data for testing which resides
7 in a different platform.

8 So they are, in fact, getting what they have always
9 asked for, which is the chromatograms and the data, and as
10 to -- and again, in responding to Mr. Watts here about the
11 relative burdens for reviewing this, I don't know what his
12 reviewers are looking at and what can be done that would make
13 that easier if it was not in an OCR document, a pdf. They
14 would still have to review it, so I don't follow the point.

15 *THE COURT:* I hear you, but I am not going to get to
16 the burden question until I -- the burden question, to me --
17 the argument I am hearing is, there seems to be something that
18 exists that the Plaintiffs think they are not getting
19 electronically and it would be less burdensome to review if
20 they got it electronically.

21 I think as a general principle, everyone would agree,
22 in the modern world, anything you can get electronically is
23 easier to search than things you don't get electronically.

24 I am just trying to understand that baseline question.
25 Is there something that exists electronically that the

1 Plaintiffs are not getting electronically that they could get
2 electronically?

3 If what you are telling me is, at least within this
4 sub-universe of documents we have of been referring to for
5 several months as batch records, they don't exist
6 electronically anywhere, and the Plaintiffs are getting all the
7 batch records, which are in paper, and they are getting them in
8 paper. But there may be a separate sub-universe of documents
9 which we, BI, call something else which either they haven't
10 asked for, or they are getting it, or -- so that is what I
11 would like to focus on right here.

12 *MS. LUHANA:* Judge, I am sorry to interject, but I
13 just want to correct the record.

14 *THE COURT:* Sure.

15 *MS. LUHANA:* The genesis of PTO 63 was a belief that
16 the Promeco batch records were in paper form, okay, and we
17 later learned in April, at the end of April, based on scrambled
18 upon documents that there are these two databases called Limbs
19 and Empower that store the chromatograms and store some of the
20 analytical data that is actually put into the batch records and
21 printed. So, they are taking stuff like data that is in
22 reasonably usable form in a database and printing it and
23 producing it to us that way.

24 The first time we learned about that was at the end of
25 April. It wasn't disclosed in the ESI disclosures previously

1 by BI, and if it had been disclosed, what would have happened
2 is, we would have met and conferred per the ESI protocol which
3 requires the parties to meet and confer about electronic
4 databases, discuss the scope of that database, the format of
5 production, the content of it. That has not taken place. We
6 still have not gotten the answers as to what is in those
7 electronic systems versus what is in the paper, because there
8 is significant overlap.

9 The first we learned of that was at the end of April,
10 and so we have carried on and tried to get those answers during
11 these meet and confers, but have been unsuccessful. That is
12 why we served a 30(b)(6) ESI notice upon BI so we can
13 understand, hey, exactly what do these databases store, how is
14 it stored, how is the interplay between Limbs and Empower, what
15 is going on there.

16 Instead, they have close even to -- Judge, we told
17 them to stop producing batch records on April 13th. At that
18 point, only 2 percent of those batch records were produced.
19 What we had told BI specifically is, you have produced them in
20 Spanish, allow us to translate these batch records, review the
21 batch records, and then have a discussion and circle back.
22 What they did was, they continued to unilaterally produce batch
23 records.

24 Then we gave them a narrower proposal and said, hey,
25 produce representative batches, like one batch record for each

1 year that you had an NDA. They didn't get back to us for two
2 weeks.

3 They decided, you know what, we are not going to take
4 your proposal and what we're going to do is produce everything,
5 all the batch records because it is in the pipeline, and we
6 said that -- we don't understand why you are doing that because
7 we want a narrow subset produced and to discuss
8 electronic production of this information.

9 They said, no, we are going to produce all the batch
10 records, not give you the answers you want in terms of these
11 electronic databases.

12 All our concern is right now is -- it's two-fold. The
13 first is we want them to act in good faith and have these
14 discussions with us in terms of production of electronic
15 records, that is the first thing, and not use the fact that
16 they have unilaterally produced 270,000 more additional pages
17 after we told them to stop against us and say, hey, we have met
18 our burden here.

19 The second thing is, we want this data in a reasonably
20 useable form as it was maintained and hopefully we are going to
21 get the answers we need per this 30(b)(6) that we intend to
22 take. That is where we stand today.

23 *MR. SHORTNACY:* Your Honor, can I respond to that?

24 *THE COURT:* Candidly, both of you, I don't really care
25 how we got where we are today. I want to deal with where we

1 are today, not how we got to where we are today, but feel free
2 to respond, Mr. Shortnacy. Then I am going to ask you all the
3 questions that Ms. Luhana wants to ask, which I was about to
4 ask you before Ms. Luhana interrupted me.

5 Go ahead, Mr. Shortnacy.

6 *MR. SHORTNACY:* I apologize, your Honor. I will be
7 brief only to say that your Honor had it correct in your
8 recitation of the events. We are not printing these to elude
9 production format, that is how the records are stored in the
10 ordinary course. I wanted to make sure that was very clear to
11 the Court, that it was not a decision to produce something in
12 paper that didn't already exist as a record in paper.

13 *THE COURT:* If you could help me, Mr. Shortnacy. What
14 exists in electronic format that we are talking about here?

15 *MR. SHORTNACY:* So, as I have explained to Ms. Luhana
16 a number of times, and I think as your Honor has framed it
17 correctly, the batch records themselves are a business record
18 maintained in paper, they contain information about all of the
19 different stages of process for manufacturing of
20 over-the-counter Zantac.

21 Pieces of information that form pieces of -- certain
22 parts of the batch records, one example is chromatograms, are
23 clearly stored electronically, and that has been, I think,
24 well-known and explained to Plaintiffs.

25 And so the question is, what else is electronic? It

1 depends on the type of testing and it depends on the question.
2 I think your Honor framed it correctly. It isn't that parts of
3 the batch records are stored electronically, they are not.
4 Certain data points may be, depending on what the data is, and
5 that has, I think, been the disconnect in the discussions with
6 Plaintiffs because Plaintiffs don't appear to have actually
7 reviewed the batch records.

8 I will rephrase that in a less incendiary way.
9 Plaintiffs have not come to us, BI, with express reference to
10 the batch records to say we are interested in understanding
11 these pieces, so it is difficult to have that conversation in a
12 vacuum. Ms. Luhana says to participate in good faith in
13 answering questions, we believe, of course, we have.

14 What we really need is to understand -- and Mr. Watts
15 has framed a very specific question about Empower, which is the
16 system that houses the chromatograms, and what is able to be
17 produced electronically from that would be duplicative of what
18 has already been provided in paper. That is a specific
19 question that can be responded to.

20 The question of we want all of the batch records in
21 electronic form, first of all, I can't answer that; and second,
22 it does not exist in that way.

23 *THE COURT:* So, if I understand you, then, I'm looking
24 at my Venn diagram in my head, there is a circle of all the
25 things that are in the batch records which are in paper, there

1 is a separate circle of all things that are kept
2 electronically. There is a point of intersection between those
3 two circles which may include things like the chromatogram data
4 and similar analytical data. Am I correct so far?

5 *MR. SHORTNACY:* That is correct.

6 *THE COURT:* Let me start with just that intersection
7 point. Does BI have an objection to producing, although it may
8 be duplicative, the electronic versions of what has already
9 been produced as part of the batch records?

10 *MR. SHORTNACY:* Right now we do because it would be
11 burdensome to restore that information. It is a near line not
12 readily available.

13 What we need to understand from Plaintiffs is what
14 they need. Are there specific batches? Are there specific
15 ways? Because the way it can be interrogated that database is
16 by a project name, it doesn't always say Zantac. So, there are
17 burdens to doing that in a world where we have already given
18 the information that is in the record.

19 If it is --

20 *THE COURT:* Okay.

21 *MR. SHORTNACY:* If they have a discussion point that
22 is specific, we can address it, and I think that would be where
23 we are.

24 *THE COURT:* Now, what about the part of my circle here
25 that is outside of the circle that includes the physical paper

1 batch records? So, there are electronic records that have
2 nothing to do with the batch records. That could be lots and
3 lots of stuff at BI, I understand that. I am cabining that
4 with things that have been requested by the Plaintiffs in their
5 requests for production which are not batch records, but which
6 are in electronic format.

7 Do such things exist? Let me start with that.

8 *MR. SHORTNACY:* Well, I am not sure exactly how to
9 answer that because I am not sure what that would include in
10 terms of things that they have asked for in electronic format.

11 *THE COURT:* No, no, they propounded requests for
12 production for lots and lots and lots of stuff. Some of those
13 requests for production call for what is in the batch records,
14 and you are producing those, and you are producing them in the
15 format in which they exist, which is in hard copy.

16 What I am asking you is -- and you have told me that
17 BI maintains certain electronic records that may -- I am
18 asking, are there electronic records that BI maintains that are
19 responsive to the requests for production which have not been
20 produced or to which you have an objection to producing, or is
21 the issue, you don't know what they are asking for so you can't
22 tell me if there are things that are responsive to the requests
23 for production that are in electronic format?

24 *MR. SHORTNACY:* The latter part is correct, your
25 Honor. Certainly have produced from a number of different

1 sources electronic data. So, for example, the BI literature
2 database, the adverse events database, I could list lot of
3 them, but anchoring back to manufacturing, I think that the
4 batch records, plus some of the testing data the Plaintiffs are
5 now asking about, sort of the raw underlying data, is really
6 where the crux of the issue is.

7 *THE COURT:* Okay. You used the phrase the "raw
8 underlying data." So, that is different from what is in the
9 batch record itself, that is some other data point?

10 *MR. SHORTNACY:* Right, I guess in two respects. One
11 is for the chromatograms themselves, so that is printed with
12 the peaks and the tabular data and has all of the information
13 in the printed form.

14 What I understand Mr. Watts to be getting at is, he
15 wants to have that in electronic form, which is to say sort of
16 a different format, but also the underlying data that comes
17 with it, and that would also be true for other parts of the
18 batch record.

19 For example, a certificate of analysis, that would
20 list specification for impurity tolerance, and I will make up a
21 number, .1 percent or .5 percent, next to it, it would say
22 complies, and so that is part of the batch record.

23 What I understand Plaintiffs to be asking for is
24 getting at the source data and source testing for all of that
25 information that would sort of form the basis of it complying

1 with the specification.

2 *THE COURT:* Let me see if I understand that.

3 So, as whatever it is is flowing through this process,
4 there are different points in which you measure different
5 things, different tolerances. I will use that word if I can.
6 So, to get the tolerance you measure that it has six, whatever
7 units of something or other, and that is within the acceptable
8 tolerances, and so it says acceptable, it passes the test, but
9 it doesn't say whether you passed the test with an 80 percent
10 or a 90 percent, it just passed the test.

11 Am I correct?

12 The batch record will say you passed the test, but it
13 won't say whether you got a 65 or an 85 on the test.

14 *MR. SHORTNACY:* I think that is fair.

15 *THE COURT:* When you say the underlying raw data, is
16 that what you are talking about, the measurement that would
17 have said whether it was a 65 percent or 85 percent?

18 *MR. SHORTNACY:* Correct.

19 *THE COURT:* One last question, and then I will let you
20 talk, I promise.

21 So, that number, the 65 or 85 percent in my
22 hypothetical, wouldn't be in the batch record, but it would
23 exist somewhere else at BI, but it is just more granular, it's
24 more detailed, it's at a different level of detail.

25 Am I correct?

1 MR. SHORTNACY: Correct, and in many respects,
2 difficult to get, and depending on the type of data, often
3 times put in manually into a system by a lab analyst.

4 THE COURT: I am not here yet to argue about whether I
5 should make you produce these things, or how hard it would be,
6 or how much better it would be for the Plaintiff. I have not
7 reached that normative question.

8 I am trying to understand what exists, because I can't
9 reach the second question until I address the first question.

10 I think I now understand the first question. What you
11 are telling me is there is some data that you have in
12 electronic format, for example, chromatogram printouts and that
13 information, which would be duplicative of the physical copies
14 that have been given, but it exists.

15 Then there is other data that has not been produced,
16 it's more detailed, it's more granular, and that also has not
17 been produced, but it exists in electronic format.

18 I am not making a value judgment whether it has been
19 asked for, should have been produced, can be produced, or
20 anything else. As a factual matter, am I at least correct, Mr.
21 Shortnacy?

22 MR. SHORTNACY: I think that is correct, your Honor.
23 It is over generalizing in a way and I understand why you need
24 to do that and I fully appreciate it. Yes.

25 THE COURT: All right. Here is what I am going for.

1 I am going to send you all back to the table to talk to one
2 another now that maybe we all understand a little better what
3 is going on here.

4 I do think at some level -- I hear from the Plaintiffs
5 that having some of the chromatogram data in electronic format
6 would be a good starting point, maybe not all of it, but maybe
7 there is a representative sampling or a few that you could show
8 them.

9 Maybe then Mr. Watts and Ms. Luhana can look at it and
10 say, oh, no, this really isn't any easier for us to deal with
11 because it is not words, it is just lines on a graph and it
12 doesn't really help us, or they might say this really helps us
13 a lot and we would like to explore further. I think that
14 conversation needs to occur, and I don't need to rule on it
15 until you all have that conversation.

16 With that, let me go back to Mr. Watts or Ms. Luhana
17 for the Plaintiffs. Have I at least helped clarify a little
18 bit of what you're staring at here?

19 *MR. WATTS:* I think the Court's instinct is right. It
20 reminds me of all of the criticism from SCOTUS that we don't
21 rule because of lack of standing. Sometimes things need time
22 to germinate.

23 What I can tell you is, is that if the Court were to
24 order me to show up with deposition proof of Torsten Mau taken
25 last Friday, Beate Scheidweiller taken tomorrow, Susanne

1 Thomsen on Thursday, by Friday I could have you a fulsome
2 record.

3 Here is what I know is true from the deposition
4 outlines that I have already prepared: A, BI Promeco
5 communicates with BI Germany and then Sanofi electronically
6 with all of this data, so it already exists.

7 B, from the standpoint of concern about giving it to
8 me electronically, they can do it attorneys' eyes only, or
9 whatever, but the bottom line is that Mr. Shortnacy already
10 said I can do it electronically. We have an objection to
11 repeating what we have already done paper-wise.

12 I can show you the emails from Ms. Finken and Ms.
13 Luhana that say, quit producing it paper-wise. Don't claim
14 burden because you produced it paper-wise, we want it
15 electronically. I am not accusing Mr. Shortnacy of games, but
16 the idea of oh, my God, it is a burden, we have already
17 produced it paper-wise when the Plaintiffs told me not to --

18 *THE COURT:* I think there is a difference between
19 saying whether we have ever produced anything in the past or
20 not, it is unduly burdensome to have to go drill down and find
21 all this stuff. That is the argument I hear today.

22 I don't hear him making the argument that it is
23 cumulative and because we have already produced it all in paper
24 it is not proportional to make us do it again. First of all,
25 he is not making that argument, and second of all, I am not

1 sure how I would react to that argument given that the
2 Plaintiffs have clearly said stop producing.

3 On the other side said, look, you asked them for the
4 documents. They are producing the documents you asked for. I
5 am not going to criticize the Defendant for complying with his
6 discovery obligations.

7 MR. WATTS: Except the discovery rules say you produce
8 documents in the format in which you maintain them, and I know,
9 and I will prove to you, and I will submit a brief with
10 deposition text about how somebody in Germany tomorrow, or
11 somebody in France on Thursday gets this stuff from BI Promeco.
12 They maintain it electronically.

13 So, the idea that you're going to take something that
14 is maintained electronically, communicated across the Atlantic,
15 and print it and claim burden is nonsense.

16 THE COURT: I don't hear -- hold on, and I will let
17 him speak for himself in a second. I don't hear him saying it
18 would be unduly burdensome to produce some of it, or samples of
19 it, or examples of it if we knew more specifically what they're
20 asking for.

21 What I heard him saying is, it would be burdensome to
22 produce all of it because the way we keep it, to go find all of
23 it would be difficult.

24 Mr. Shortnacy, I don't want to put words in your
25 mouth. Am I understanding you correctly?

1 MR. SHORTNACY: That is correct. That is a
2 conversation we have always been willing to have, and I think
3 that what has been lacking is specificity. Again, I am hearing
4 from Mr. Watts for the first time that there is information
5 shared between France, and I don't know exactly what he is
6 speaking of, and so it is difficult to promise or to evaluate
7 that having just heard it.

8 I do also want to make the point, your Honor, I am not
9 waiving the right to reach a point in this discussion to say,
10 you know, this is fruitless, not specific enough, and we have
11 given you all of it in paper. I don't think your Honor has
12 ever indicated that not saying something is a waiver, but I did
13 want to plant that stake.

14 I am not saying that -- those words will never been
15 said, but I am saying I am willing -- BI is willing to engage
16 with Plaintiffs to have some targeted -- look for information
17 along the lines of what Mr. Watts is suggesting, but we need to
18 have that conversation.

19 MR. WATTS: Can I make a suggestion that we wait until
20 Friday? I will spend part of my deposition of Beate
21 Scheidweiller tomorrow to prove how this information was
22 communicated to Germany. I will spend part of my deposition on
23 Thursday to prove how this information was produced to Susanne
24 Thomsen, and I will produce to the Court deposition in page and
25 line. I am so confident that I am right that if I can't prove

1 it to you, deny the motion. But by Friday, I promise you, I
2 know how this information is communicated across the pond.

3 Maybe today is a little premature and Friday would be
4 ripe.

5 *THE COURT:* You can do what you want. You can file a
6 PTO 32 and you can put a motion before the Court any time you
7 want to and I will rule on it if it comes before me.

8 What I am hearing is, you all are taking past each
9 other today. That's what I'm hearing. Mr. Shortnacy is not
10 saying he will never give you any of these records in
11 electronic format, nor are the Plaintiffs necessarily saying
12 give us everything you have tomorrow in electronic format.

13 I think there is an understanding here that BI is not
14 denying that the documents exist, no one is suggesting that the
15 Plaintiffs are not acting in good faith and do not have a good
16 evidentiary basis to believe that it does exist electronically,
17 but I think you all need to sit down and talk about what
18 exactly exists, why can't we get it, how hard would it be, the
19 same conversations you have all the time.

20 If you can't reach some conclusion after a meet and
21 conferral you can tee up whatever motions you want and I will
22 rule on it.

23 Mr. Watts, it seems to me you are spending a lot of
24 time trying to prove a fact that he is not denying, which is
25 that they exist. He agrees that they exist and he agrees they

1 exist electronically. If you want to waste your depo time
2 proving a fact that he is not challenging on, go forth, but I
3 think the time would be better spent talking with each other.

4 Now that you understand, and Mr. Shortnacy has
5 candidly told the Court this exists, it is just a question of,
6 we can't be asked in bulk to get all of it in electronic
7 format, give it to them right now. We need to have a better
8 sense of exactly what they want and maybe some sequencing.

9 Mr. Watts.

10 MR. WATTS: I agree with you, Judge. I think it
11 is really a debate about what percentage of the common benefit
12 time is going to go to the Watts Guerra Puerto Rico office to
13 read meaningless Spanish pdf's versus Roopal Luhana to do
14 meaningful scientific work and Tracy Finken to do a
15 meaningful analysis of testing data.

16 If you want to make me spend three months reading
17 through pdf's of Spanish documents, I will do it and be
18 handsomely paid for it, but it is a waste of time. So, we will
19 get the data for you by Friday, and if I am wrong, I will be
20 the first to admit it.

21 THE COURT: Again, Mr. Watts, I am not telling you
22 what to do. Spend your time doing whatever you all want to do,
23 looking at whatever you want to look at. All I am ruling on is
24 what you are entitled to have, and what you are saying is that
25 there is some stuff in electronic format that we think we

1 should get.

2 We have now confirmed with Mr. Shortnacy that stuff
3 exists in electronic format that you don't have, so we have
4 closed that loop. And there may be stuff that exists in
5 electronic format that overlaps with stuff that you have in a
6 different format.

7 Now that we have understood clearly on both sides that
8 is where the world is, you all now need to have the
9 conversation about why can't we have it, this is what we want,
10 this is the order we want it in, this is how quickly we want
11 it, this is how much of it we want, but at least we now know
12 what is out there.

13 Now go forth and have that conversation. If at the
14 end of that conversation BI says, no thank you, we will give
15 you nothing, file your motion and I can rule. If BI says we
16 will give you half of it, but not all of it, file your motion
17 and I'll rule. But right now, you all haven't even talked
18 about it.

19 You can tee up the ball any way you want to tee it up.

20 MR. WATTS: I agree. We will meet and confer with Mr.
21 Shortnacy, I will show up with deposition transcript by Friday
22 and we will meet and confer and get with the special master.
23 If we need the Court's assistance next week we will get back
24 with you.

25 THE COURT: Great. My goal for today has now been

1 accomplished. I just wanted clarity for all of us as to what
2 exists, what is in paper, what is electronic, what has BI got.
3 At least from my standpoint, I think we are there, so I will
4 encourage you all to go forth with that.

5 *MS. LUHANA:* Judge, can I raise one thing in terms of
6 the chromatograms?

7 *THE COURT:* Sure. Of course.

8 *MS. LUHANA:* When you print the chromatograms, you can
9 print it according to specifications you want versus the full
10 picture. So, we are looking for that full picture because we
11 believe NDMA, we can find it there if we actually do get a full
12 picture and the underlying raw data, and that is why it is
13 essential to the case.

14 In addition to that, there was a 483 investigation
15 that was done by the FDA where BI had produced all the
16 chromatograms from 2019 electronically and then it went back
17 retrospectively and pulled all that data. So, I don't know
18 where they are in that production, but since it has already
19 been pulled for the FDA, presumably it is in that reasonably
20 usable format and it can be produced to us in a similar
21 fashion.

22 Then we could narrow it further, but we are looking
23 for that data as well as the impurity testing from Limbs. So,
24 those are the two types of data we are looking for, but as you
25 have recommended, we are going to meet and confer and we will

1 circle back with the Court after we do.

2 *THE COURT:* Again, let me sort of summarize from the
3 Court's perspective. Both sides have legitimate equities here
4 and I hear you loud and clear.

5 On the one hand, the Plaintiffs are entitled to get
6 proportional discovery in the most meaningful useable format
7 that they can. I don't think anyone disagrees with that.

8 On the other hand, the Defendants are entitled to not
9 be overburdened by having to produce a lot of expensive stuff
10 and costs. That is where the Court gets involved in balancing
11 those two concerns.

12 So, I think the more detailed conversations you can
13 have about precisely what data you are looking for, the
14 timeframes you are looking for -- Ms. Luhana, what you just
15 said to me is very helpful when you say, look, this is exactly
16 what we are looking for, these particular chromatograms because
17 they show this, or this underlying raw data, because maybe
18 there are a hundred data points that go into the chromatogram,
19 but this is the one -- this is the box we want, the box that
20 says NDMA, or says Ranitidine, or says something else.

21 I think the more detailed and specific the Plaintiffs
22 can be in telling the Defendant what they want, the Court's
23 expectation will be that you have narrowed your focus as much
24 as you can, that should help the Defendants -- BI identify how
25 hard will it be to produce this and do we have a legitimate

1 objection.

2 I will say it again, I am not ruling on this issue,
3 but I hear the Plaintiffs' concern and I want to allay this.
4 The argument -- obviously, if BI makes the argument, I will
5 hear the argument with an open mind, but the fact that BI is
6 continuing to produce materials in paper that were requested by
7 the Plaintiffs, even though the Plaintiffs said stop producing,
8 I can't, at least as I sit here today, criticize BI for that.

9 They are trying to get materials out of a country
10 where we had trouble getting in in the first place. I would
11 hate to get in a situation where we get down the road again and
12 now the Plaintiffs are coming to me going, well, they didn't
13 give us all the batch records and now they are back in
14 Mexico and we can't get them.

15 So, on the one hand, BI can produce what it wants to
16 produce in response to your request.

17 On the other hand, I hear the Plaintiffs loud and
18 clear, that if BI comes down the road in three months and goes,
19 Judge, we produced a million documents in paper, why do we have
20 to produce these other things electronically, you have made a
21 very clear record that you have been telling them to stop, and
22 if they proceed forward, they proceed forward at their own
23 risk, and the Court will take that into account.

24 I am not ruling on either side, but I want both sides
25 to understand I hear you both and I understand why you are

1 doing what you are go doing.

2 Mr. Watts.

3 MR. WATTS: Just one other comment on that. Again, I
4 am not complaining that they produce it in paper, but if it is
5 going to take 90 days for my lawyers in Puerto Rico to read
6 this stuff because it is in paper -- we are going to Mexico
7 City on August 16th. They have the ability to flip me the
8 electronic documents tomorrow.

9 The bottom line is, if their argument is 30 days from
10 now, we have already given them to you in paper and not
11 electronically, we are out of time. We are supposed to go to
12 Mexico City on August 16th, so this is a time issue as well as
13 a burden issue.

14 THE COURT: I understand. I saw Mr. Shortnacy shaking
15 his head when you said they can flip a switch and get me it
16 electronically tomorrow. That is the conversation you all need
17 to have, because what he is telling me is they can't, or at
18 least they can't all of it, that some of it is easy to get to
19 and some of it is hard to get to, and you all just need to have
20 that conversation.

21 Again, they are not waiving anything, but I don't hear
22 BI necessarily saying we won't give you what is in electronic
23 format once we have a better idea what you are asking for, and
24 if it is easy, we will give it to you.

25 They are not objecting to that today. They may object

1 to that later, but again, that is a conversation you need to
2 have. If you need the special master to guide you, I am sure
3 she will be happy to help guide you.

4 MR. WATTS: We will have that conversation tomorrow
5 about whether converting to pdf and push send to unprint is
6 easier than emailing an electronic deal and we will show up
7 Friday with that evidence if we need to, otherwise, we will
8 confer.

9 THE COURT: All right. I will leave that to you.

10 Mr. Shortnacy, I will give you the last word.

11 MR. SHORTNACY: Your Honor, just one last seed to
12 plant. To Ms. Luhana's statement about the testing and why
13 they believe it is relevant, that testing will not show NDMA
14 because there was no specification to test for that.

15 So, one of the things that BI can see value in is
16 avoiding unnecessary squabbles like this through simple
17 questions that can be put that may resolve issues that the
18 Plaintiffs have about the types of testing that were done, or
19 any number of things that can maybe lend themselves to written
20 discovery, logs, whatever, that may avoid some of this.

21 So, that is one other thing that we are, obviously,
22 open to if it will avoid unnecessary disputes.

23 THE COURT: Thank you. Like I said, I can just speak
24 for myself. In talking to you all today, the more detailed and
25 less abstract, the better. So, when I hear analytical testing

1 data, I don't know what that means. When you say I want to
2 know the -- when you ran a test on September 22, 1993, what was
3 the NDMA measurement, that is a lot more detailed and I can
4 respond to that better.

5 Again, I will leave it to you all. You are very
6 experienced and very good at this, and the special master will
7 work with you. I really do think the more detailed the
8 questions, the more detailed the answers, and then the Court is
9 in a better position to rule. If BI says, no, we are not going
10 to do it, then Ms. Luhana and Mr. Watts can come back and say
11 it is not that hard, we told them exactly what we want, and we
12 will have that discussion.

13 Thank you. I will excuse the parties on --

14 *MS. LUHANA:* Judge, one last thing. We have
15 outstanding questions to Mr. Shortnacy about these electronic
16 databases, so we will look for responses, hopefully he can
17 produce them, and then we can have a fruitful discussion.

18 *THE COURT:* Okay. I don't know if that is formal or
19 informal. Anything you can do to expedite it would be better.

20 Thank you all very much. I will excuse the parties on
21 the BI issue.

22 *MS. LUHANA:* Thank you, Judge.

23 *MR. SHORTNACY:* Thank you, your Honor.

24 *THE COURT:* Let's turn to the GSK issue. Welcome
25 back, Ms. Finken and Mr. Sachse.

1 I will tell you I -- I forget whether it was
2 Ms. Luhana or Ms. Finken who, at the last status conference
3 with Judge Rosenberg, said something about there are still
4 hundreds of clinical trial studies that we don't have, and that
5 concerned me because we have been having this conversation
6 since March about what exists, what doesn't exist, et cetera.
7 I wanted to get a better sense of where we are.

8 I think I said at some point along the road here,
9 there comes a point when GSK is allowed to simply say we have
10 done all we are willing to do, we have made a reasonable
11 effort under Rule 26(g), and even if other stuff exists, we are
12 not producing it. Then the Plaintiffs can move to compel, and
13 I will rule.

14 It seems to me we ought to be pretty close to that
15 point, if we are not at that point by now, but let me turn to
16 Mr. Sachse and see where we are.

17 *MR. SACHSE:* Sure, your Honor. Let me start by just
18 making sure that we are all on the same page in terms of what
19 the Plaintiffs have, what we are still looking for, and the
20 progress we have made.

21 So, where we are is that GSK has already produced more
22 than 500 preclinical and clinical studies. We have also
23 produced -- GSK has also produced the adverse events from the
24 database that relate to cancer. This includes adverse events
25 coming out of any of the clinical trials that we have been

1 taking about.

2 We have produced the complete regulatory file for
3 Zantac. We have produced hundreds of lab notebooks, which is
4 what it sounds like, it is the chemists and the other
5 scientists, their kind of working papers. Of course, where we
6 are now focused is what is becoming, I suppose, a notorious
7 MedTrack sheet. This is the snapshot in time from 2003, 760
8 entries, and as of today, I believe the count is that there are
9 457 of those 762 entries that we have not been able to find.

10 So, I think the sort of top line headline here is we
11 are continuing to look. I don't think we are yet at the point
12 where we throw up our hands and say, we are done, we can't find
13 these.

14 At the same time, we are providing regular updates to
15 Ms. Finken and her team. In fact, earlier today my colleague,
16 Noah Becker, while still mourning the Sixer's loss last night,
17 he provided the latest update to the spreadsheet.

18 So, we are making progress, and I will say -- I
19 imagine Ms. Finken will say it has been slow, and I agree. It
20 has been a bit surprising that we haven't made more progress in
21 some respects, but in other respects, maybe not so much.

22 What we are doing is, we are kind of double tracking,
23 or maybe even triple tracking. One thing we are doing is, we
24 are taking this list and we are comparing the entries on
25 MedTrack to the PIER reports, which you have heard about

1 before, and wherever we think we have something that looks like
2 a match or a close match, we are looking more closely at the
3 materials from the archive and evaluating those for production.

4 The other thing that we have been doing, and I think
5 are now maybe focusing on a little bit more again is, we went
6 and compared the MedTrack list in the first instance to the
7 documents we have already produced to see how many of these
8 studies are already in the Plaintiffs' hands, and as we have
9 gone and looked again at our production, one of the challenges
10 that we have is that some of these old studies, they are paper
11 documents that were digitized, and OCR, optical character
12 recognition, is not always going to pick them up.

13 So, I think we have started to find a few additional
14 studies that way that we have now crossed off the list, but we
15 are still in the hundreds. So, where does that leave us?

16 We sort of look at the list of the 450 plus, 457, and
17 say what more can we do in this regard to look for these?

18 The challenges that we are having, one I have
19 mentioned before, is that when you look at this sheet, it is
20 not necessarily a list of studies that were completed,
21 concluded, study report made, so you would expect that you
22 might be able to find a report that we could then turn over to
23 the Plaintiffs. Some of these are identified as planned, some
24 of these are identified as canceled, and terminated is another
25 characterization.

1 When you look at the overall number of studies where
2 we are sort of struggling to find anything that kind of
3 matches, or might match, those are entries where we are seeing
4 a lot of missing data or missing entry -- missing
5 documentation.

6 The other thing that we have learned over the course
7 of the last several weeks is that the naming conventions here,
8 frankly, they are not consistent. So, when you look at
9 MedTrack, it might identify a study by one name or an entry by
10 one name, and then you go to PIER and you can't get a
11 one-to-one match, so it does take a little bit more digging and
12 kind of searching around to see if maybe something that was
13 named, you know, I don't know, esophageal GERD in MedTrack is
14 named something else in PIER.

15 So, we are continuing to do that and it is a
16 time-consuming process and we are sort of incrementally drawing
17 down that list.

18 The last thing I will say is that there are some
19 entries that are just, frankly, baffling. There are things
20 like data not available, or see Jane Mills for details, things
21 like that, that just don't seem like we are ever going to be
22 likely to find an actual document or documents that match up
23 with that.

24 And then the last thing I will say is that when we
25 look at the list, there are entries that seem pretty far afield

1 from what we are trying to accomplish here. What we are
2 focused on, of course, is the safety of this molecule, the
3 studies that were done, whether there was any indication in
4 those studies that this molecule had an increased risk of
5 cancer.

6 A lot of the studies that are on this MedTrack sheet
7 are more focused on efficacy, there are some what are called
8 comparator studies where they are comparing one molecule to
9 another, which is better, that kind of thing. There are even
10 some studies about the comprehensibility of the label. So,
11 these are not -- you know, when you look at the 457, it is not
12 like there are 457 studies about the safety of Ranitidine, and
13 that information is not in the Plaintiffs' hands.

14 As I mentioned, the Plaintiffs already have -- out of
15 our safety database, they have the adverse events relating to
16 clinical trials that would be relevant to this litigation, and
17 I will just note that we had our 30(b)(6) deposition of our
18 safety witness last week, not a single question about any
19 adverse event coming out of that database related to any trial
20 or anything else.

21 I think that is kind of where we are. Personally, I
22 am not willing to give up. Some of my teammates might be
23 egging me on to give up, but I think we are not quite there
24 yet. As I said, this is an ongoing effort and an ongoing
25 dialogue with Ms. Finken.

1 *THE COURT:* Okay.

2 *MR. SACHSE:* And I see Mr. Watts waving at me.

3 *THE COURT:* Ms. Finken gets priority over you on this
4 one, Mr. Watts. I'm sorry, she is the GSK designee. If she
5 wants to call on you, that's a different story, but Ms. Finken
6 goes first.

7 *MR. WATTS:* I defer to the boss.

8 *THE COURT:* Are you also mourning the 76ers loss last
9 night, Ms. Finken?

10 *MS. FINKEN:* I am, and so is my entire household.

11 *THE COURT:* You need to have five players willing to
12 shoot the ball.

13 *MS. FINKEN:* Thank you, your Honor. So, Mr. Sachse
14 and I have had several conversations over the past week to
15 clear up some misconceptions that we have had based on
16 conversations with one of Mr. Sachse's colleagues about the
17 production.

18 We did receive an updated spreadsheet today about the
19 human clinical trials, and as your Honor probably remembers
20 because we had an ad nauseam full-day hearing about it, there
21 was the MedTrack spreadsheet that had 764 human clinical trials
22 listed. They have produced 272 of them as of today's date and
23 there are another 457 or so that are still missing according to
24 the most recent spreadsheet.

25 From my conversations with Mr. Sachse, they are still

1 going to be searching and producing what they are able to find.

2 There are two things that we have asked for that I am
3 hoping that Mr. Sachse will be able to provide for us and he
4 said that he would look into it.

5 One is, we had asked if there were any additional
6 fields for the Medtrack spreadsheet that would identify the
7 length of the study or the duration of exposure, or if that
8 data is available anywhere else, so that we could really take a
9 deep dive into some of the studies that are still outstanding
10 just to see how long people were actually taking Zantac during
11 those studies and things of that nature.

12 The second thing that we have been requesting, and Mr.
13 Sachse and I didn't speak about this over the weekend, was a
14 listing from the PIER index which is what they are cross
15 referencing. With the human clinical studies, they are
16 searching the PIER database to see if they are located within
17 that database, and the ginormous spreadsheet that your Honor
18 might recall we went over during that lengthy hearing has a
19 number -- many, many, many entries that relate to clinical
20 study protocol numbers.

21 The way these are identified is by study number, when
22 you search the spreadsheet, they come up on the spreadsheet,
23 and we had asked which ones have been pulled and reviewed so
24 far so that we could maybe narrow down and help with
25 determining which ones might be relevant in terms of human

1 clinical trials that are outstanding, and we haven't been
2 provided with that information, albeit we just asked for that
3 last week based upon some conversations that we had with Mr.
4 Sheehan, who is co-counsel with Mr. Sachse.

5 So, I think that those two items might help us work
6 through some of these issues, and I will let Mr. Watts explain
7 to you why some of the clinical trial data relating to canceled
8 studies might be relevant here, why that is information that we
9 would seek as well.

10 *THE COURT:* Okay. I am not going to rule on it, but I
11 will hear you, Mr. Watts.

12 *MR. WATTS:* Judge, if I could, this is not really my
13 fight, but as I understand, it is a motion to compel by Mr.
14 Sachse to compel the Harvey depo, which is --

15 *MS. FINKEN:* Mikal, that actually was taken down.

16 *MR. WATTS:* Okay. Let me kind of give you the spirit,
17 and I apologize, but what I do know is the following. I didn't
18 know anything about this until about 16 hours ago.

19 Number one, I know that at 3:00 a.m. Eastern time
20 Tracy Finken got on a Zoom call to watch the deposition of John
21 Wood which I took for about nine hours. What I also know is
22 that GSK canceled clinical studies when the placebo was
23 showing better efficacy than Zantac.

24 What I also know is that there was a very large
25 discussion with respect to anti-secretion that was canceled by

1 the witness that I had today, John Wood, from publication.

2 What I know is the witness had no explanation
3 whatsoever as to why two-thirds of the clinical trials were no
4 longer available. His partner, Jane Mills, had no explanation
5 as to why the data was not available.

6 The bottom line is, is that it seems like 262 of the
7 467 clinical trials are missing, so I think we have a real
8 material problem here.

9 I had a jousting session with a very sophisticated
10 witness today who told me the data that we saw said there was
11 no nitrosation risk whatsoever. I asked him for the data, he
12 couldn't point me to it, and two-thirds of it is gone. So,
13 respectfully, I don't know how you try a pharmaceutical case
14 with two-thirds of the clinical trials missing.

15 Now, if the Court says, it is good enough that GSK,
16 who made 30 or \$40 billion off this drug, can say two-thirds of
17 the clinical trials are gone, then I guess I can try the case
18 with a negative inference. I do think that discretion is the
19 better part of valor and Mr. Sachse's group should be compelled
20 to continue to try to find this stuff.

21 I find a hard time believing that a former member of
22 the European Union, the precursor to the United States, speaks
23 the same English that we do, can't store clinical trials in a
24 warehouse without losing two-thirds of them in the 2020's.

25 So, that would be the one thing that I would comment

1 on based on what I learned today. I was shocked that John
2 Wood, a high level employee of Glaxo, had no explanation as to
3 why all these clinical trials are gone.

4 There is just no explanation for it in the '80's,
5 '90's, 2000's. There wasn't a hurricane that hit Scotland,
6 there wasn't some earthquake that wiped out the database, there
7 wasn't some Russian hacking that said the computer files were
8 all wiped out. They are just gone, and I think we are entitled
9 to know where they are.

10 *THE COURT:* Okay. You know, I hear you, but that is
11 not the issue before me at this time.

12 As I have said to the parties directly and through the
13 special master many, many times, if you want something from me,
14 ask for it. Nobody is asking me for anything here.

15 Mr. Sachse is saying to me we are doing the best we
16 can, we are still looking, we are not digging our heels in and
17 saying we don't have to do any more. The Plaintiffs haven't
18 come to me and said we want a remedy, they are not giving us
19 what we need, we want a remedy.

20 If Plaintiffs want a remedy, tee up a PTO 32, tell me
21 the remedy you want, and I will have a hearing and I will rule
22 on it. If GSK feels like we have done enough and we ain't
23 going to do no more, tell the Plaintiffs that. They will file
24 a PTO 32 and I will rule on it. But that is all I can do,
25 folks.

1 On the flip side, if you are working through it, then
2 work through it, but we need to get this moving, folks. The
3 point at which one side or the other has to stop being --
4 candidly, has to stop being nice and just dig their heels in
5 and say, I am going to go to the judge, that is what he gets
6 paid for, and I am going to get a ruling, is fast approaching.

7 You got your very generous extension on PTO 30. I
8 know you all went home and thought how nice Judge Rosenberg
9 was about that, but you ain't going to get another one.

10 So, I don't want to be here in 90 days still hearing
11 we can't do X, Y, Z, A, B, and C because we haven't gotten what
12 we need, and nobody teed up an order for me to rule and order
13 somebody to do something. So, that is my message today.

14 I am appreciative of the fact that everyone is working
15 well together and trying to be ethical and professional and
16 cooperative. But at some point, the case has to move forward
17 and somebody needs to tee this up for me one way or the other,
18 and if there is a remedy that the Plaintiffs are entitled to,
19 they will get it. If GSK has done enough, I will rule that
20 they have done enough and you will appeal me to Judge
21 Rosenberg, and then she will decide.

22 MR. WATTS: In forecast, a very large army of people
23 are going to spend a fortune going to London beginning July 18.
24 I would like GSK's clinical trials in advance of that trip, in
25 time to read the documents to take the depositions of the

1 science people we are scheduled to take beginning July 19.

2 That is the ask.

3 *THE COURT:* Then file a motion, or file a PTO 32
4 request and they will respond to it and I will rule on it.
5 That is all I can do.

6 *MR. WATTS:* We will do it. Thank you, Judge.

7 *MR. SACHSE:* Just to respond on that, your Honor, if I
8 may, first of all, I need to note that I don't think the jury
9 is here. I feel like I just got a bit of a preview of Mr.
10 Watts' closing argument.

11 Second of all, I have to correct the record because
12 Mr. Watts is talking about two-thirds of the studies are
13 missing; that is just not true. The studies that served as the
14 basis for the approvals, they have all of those, they have all
15 of the safety data relating to those studies.

16 What we are talking about here, yes, the number is big
17 because we are talking about a 40-year history of this product.
18 The number of entries on this MedTrack sheet that we still
19 haven't been able to locate is a large number, but the
20 majority -- when you add in the studies we have already
21 produced here, the majority of them are in the Plaintiffs'
22 hands. They already have the stuff that really matters here.

23 *THE COURT:* Again, if somebody tees it up and I have a
24 hearing, everybody will get to present their evidence, not
25 their arguments, their evidence as to what they have, what they

1 don't have, and what is missing, and I will have to decide
2 whether the Plaintiffs have been given what they are entitled
3 to or not.

4 At this point, no one has asked me to do that, but I
5 am telling you, that is where this ultimately has to end. I
6 don't think Mr. Sachse is going to wake up next week and say,
7 oh, we found all 457, here they are. I don't think the
8 Plaintiffs are going to wake up next week and go, you know
9 what, we decided we have enough, we don't need anymore. I
10 don't see the world ending that way in either direction.

11 So, this is coming to me eventually. I would like to
12 acknowledge that and just encourage you to narrow it as quickly
13 as you can and tee it up as fast as you can in a way that is
14 meaningful to both sides.

15 MR. WATTS: 467, Judge, 61.2 percent gone.

16 THE COURT: Hold on. Mr. Sachse told me it was 457
17 out of 762, that is 465.

18 Obviously there are two that have disappeared into the
19 ether that now we have to fight about, where are the other two,
20 obviously the two most important studies in the entire case
21 and, you know, they are somewhere. Okay.

22 MS. FINKEN: Your Honor, I think it would be helpful
23 to have a check-in in the next -- maybe two weeks from now and
24 see where we are at in terms of the production.

25 While I hear what you are saying in terms of teeing up

1 a PTO 32, some interim deadlines and guidance I think would be
2 helpful in getting this moving along. Mr. Sachse and I have
3 been working through this, and we have been working well
4 together in terms of trying to get this done.

5 At some point, you are correct, we are going to need
6 to figure out what happened to these studies and why they are
7 not available.

8 The product had been on the market up until 2019
9 globally for GSK, and typically companies don't destroy their
10 clinical trial data while -- during the life cycle of the
11 product, so it raises a lot of questions for us, your Honor.

12 *THE COURT:* Clearly it does, and some of the response
13 I hear from Mr. Sachse is, some of what you see there isn't
14 what you think it is, it's not that we destroyed it, we
15 actually never ran that test, but it looks like we did, or that
16 notebook I dropped in the river, I don't know.

17 I am not encouraging anyone to give me more work than
18 I already have, so I don't want to suggest that. I do want to
19 acknowledge, look, I see how hard the parties are working on
20 this particular issue. I understand Mr. Sachse had some health
21 issues that slowed things down a little bit.

22 I am not criticizing either side for -- I am never
23 going to criticize the parties for working together to try to
24 resolve an issue, but I do think at some point we just need to
25 bring this to closure.

1 I am happy to set another interim deadline. I think
2 two weeks from today is July 6th. I am not going to ruin your
3 July 4th weekend.

4 What is your pleasure, Ms. Finken? I will let you
5 pick a day. We have usually been doing two weeks, but I'll
6 give you whatever date you want. Mr. Watts will be
7 working night and day over there in Belgium on the 4th of July.
8 Everyone else might want to quit early.

9 MR. WATTS: This is our first a 11:00 p.m. hearing on
10 discovery matters, Judge.

11 THE COURT: And our last, I hope.

12 MS. FINKEN: Your Honor, I think -- how does July 1st
13 work, before the holiday weekend? It's a Thursday.

14 THE COURT: Works for me. July 1st will be the
15 hundred and thirty something anniversary of the Battle of
16 Gettysburg.

17 MR. SACHSE: July 1st would be fine with me, your
18 Honor.

19 THE COURT: Should we have a live hearing or do you
20 want to just file a notice with me, Ms. Finken?

21 Let's set it for a live hearing. If you all have some
22 Kumbaya and are very happy by then and really don't think there
23 is anything I need to be involved with, you can just file a
24 written notice before that date and I will take it down.

25 MS. FINKEN: Fair enough. Thank you.

1 *THE COURT:* Can I ask the BI people to come back for a
2 second. There was one other issue that I thought I was clear
3 on, but as I am thinking about it, maybe not.

4 Let me ask Ms. Luhana and Mr. Shortnacy if they could
5 come back real quick. Thank you both.

6 Since I am going to have the GSK people back on July
7 1st, does it make sense to have a check-in with you all as well
8 on what progress has been made and if you still need the
9 Court's involvement?

10 In the interim, if either side wants to bring a PTO 32
11 before we get to July 1st, you can certainly do that, or if you
12 want an earlier hearing, you can ask for one through the
13 special master. Ms. Finken makes a good suggestion that just
14 keeping dates on the calendar helps.

15 So, does July 1st work for you, Mr. Shortnacy?

16 *MR. SHORTNACY:* Sure, your Honor, I appreciate that.

17 *THE COURT:* Ms. Luhana?

18 *MS. LUHANA:* Same here, Judge.

19 *THE COURT:* Great. Mr. Watts, you're here. July 1st
20 it is for both.

21 The other thing, and I realize this is not on the
22 agenda here, but the special master has asked me a couple of
23 procedural questions about the topic of depositions and
24 cancellation of depositions and things like that.

25 I don't want to open a hornet's nest here by getting

1 into a long discussion other than to say the following: A
2 party sets a deposition, a party can cancel their deposition.

3 Now, the timing of that and whether the timing of a
4 particular cancellation causes prejudice to the other side in a
5 way that the other side is entitled to a remedy is a separate
6 question. But I don't think I have ever heard of a Court
7 ordering someone to take a deposition when they said they
8 didn't want to take it.

9 Again, whether there is a remedy in the future for the
10 fact that someone canceled the deposition, particularly in a
11 case like this with very tight deadlines, is an issue I will
12 take up on an individualized basis if it happens. I understand
13 there has been some debate back and forth among the parties
14 about whether a party can cancel a deposition somewhere along
15 in the process after setting it, and my view is they can.

16 If that gives you all guidance as you go forward,
17 sobeit, again, without prejudice to anybody seeking a remedy
18 that may result from that.

19 The other thing I wanted to clarify with the BI
20 people, it occurred to me in listening to you that there is a
21 little bit of tell us what you want, we will tell us what we
22 have. It is unclear kind of who goes first.

23 In the interest of breaking that stalemate, I am going
24 to direct the Plaintiffs to, in the first instance, identify
25 for the Defendant with some greater detail exactly what it is

1 you want, what is the data that you believe they have and that
2 you want, in as detailed a fashion as you can.

3 Then it will be the burden on BI to then say either we
4 don't have it, we do have it and we will give it to you, or we
5 do have it, but we don't think we should give you all of it,
6 some of it, none of it, whatever.

7 I think just to break the stalemate I will direct the
8 Plaintiffs to go first.

9 Now, obviously, BI has a -- I don't know if it's an
10 ethical obligation, but a professional obligation that if they
11 don't hit the exact button that you know exactly what they are
12 asking for, and you have it, but they haven't said the magic
13 words, I would expect BI to say, it seems to me what you are
14 really asking for is this, and we do have that. We are still
15 not going to give it to you, but we concede that we have it.
16 That is how I would expect the dialogue to go.

17 Mr. Shortnacy.

18 *MR. SHORTNACY:* A fair point, your Honor, well taken,
19 and I agree.

20 *THE COURT:* Mr. Watts, Ms. Luhana, any issues?

21 *MR. WATTS:* Judge, I think we will be able to give
22 them a request of what we want after the depositions tomorrow
23 are completed.

24 *THE COURT:* Great. Let me be clear, that is without
25 prejudice to, obviously, as you go along, if you have specific

1 information -- I am not limiting the Plaintiffs to one request
2 and then you are stuck with all you get is what you asked for
3 in the first cycle. This is an iterative process, I understand
4 that, but somebody has to go first. That doesn't mean they
5 don't get to go again.

6 *MS. FINKEN:* Your Honor, can I say one thing?

7 *THE COURT:* Hold on. I need to call on you so
8 Mrs. Stipes keeps -- Ms. Finken. Go ahead.

9 *MS. FINKEN:* I'm sorry, Ms. Stipes. Tracy Finken on
10 behalf of Plaintiffs.

11 One of the problems we have had with BI, and this
12 particular issue, and I have been watching it unfold now for
13 three months, is that we have been requesting information about
14 how the data is maintained, how long it is retained, and simple
15 questions like that that would allow us to tailor our requests
16 in terms of this electronic data.

17 That is something that we have been unable to get
18 clear answers on from Mr. Shortnacy. We have asked multiple,
19 multiple times and I am hoping, with the guidance that your
20 Honor gave the parties today, that we will actually be able to
21 get substantive accurate answers and responses to the questions
22 we have been posing for quite some time, and then we can maybe
23 move the ball forward.

24 *THE COURT:* Again, if the Plaintiffs go first and they
25 say this is the category of data that we want, obviously, the

1 first response will be either we have it or we don't, and if we
2 have it, it is either in electronic format or it is not. That
3 would be the logical response that I assume you will get.
4 Nobody is prejudiced by giving that answer.

5 The next level of questioning is where it gets
6 tougher, right? Will you give it to us? How much will you
7 give us? I understand that, and that is where the parties --
8 that is why you all get paid the big money, to have that debate
9 and that discussion and work through those issues if you can.
10 If you can't, that is why I get paid a lot less money to then
11 tell you what to do.

12 Mr. Watts.

13 MR. WATTS: Judge, just on your first comment about
14 canceling depositions, I can tell you that our special master,
15 Jaime Dodge, has been on me like a cheap suit, and we had a
16 Plaintiffs' deposition committee call today, we'll have another
17 one Friday.

18 THE COURT: Okay.

19 MR. WATTS: My goal, at the strong request from the
20 special master, is to give you and the Court an updated
21 deposition schedule by the end of the month. That is not a
22 wish list of when depositions are going to happen, it is going
23 to be a list of depositions that we have met and conferred and
24 scheduled, so that when we see yourself and Judge Rosenberg by
25 the end of the month, the deposition schedule between now and

1 September, you will know that it is well up to date, not
2 canceled, and hard dates.

3 *THE COURT:* No problem. My comments were not meant to
4 criticize either side. I understood from the special master
5 there had been maybe one or more occasions where the Plaintiff
6 wanted to take down a deposition closer in time to when the
7 deposition was to occur and there was some discussion among the
8 parties about whether that was proper or not.

9 The special master suggested it might help the
10 parties if I gave a little bit of guidance on that, but that is
11 not in any way meant to suggest that either side is acting
12 improperly or that -- there is all kinds of reasons why
13 depositions may have to be rescheduled at the last minute. It
14 is probably going to recur when the Defendants are taking the
15 Plaintiffs' side depositions.

16 That's why I am being very neutral here. I truly am
17 not casting aspersions on anybody.

18 *MS. LUHANA:* Judge, I wanted to raise one point, if I
19 may.

20 *THE COURT:* Yes, Ms. Luhana, of course.

21 *MS. LUHANA:* Previously, when I had raised the
22 outstanding questions, some of the outstanding questions we had
23 to Mr. Shortnacy were specifically the two databases and the
24 data that is stored in the databases. That is what I was
25 looking to have answers to, and then we could narrow the funnel

1 and say we don't want any of this, but this is what would be
2 helpful.

3 I believe it is easy on their end to inform us as to
4 what data is housed in the databases because they only input a
5 certain amount of data into Empower and into Limbs, and that is
6 what we're looking for and that will guide and frame the
7 discussion for us.

8 *THE COURT:* I hear you, but I am going to stick with
9 my order, which is that you have to go first. You are the
10 Plaintiff, you brought the lawsuit, you have a better idea of
11 what you want. It is not a question of tell us everything you
12 have, and then we will go shopping in your records. It's, we
13 are the Plaintiff, this is our theory of the case, this is the
14 evidence we want. Tell us if you have that evidence or not.

15 That is how I want this to proceed.

16 *MS. LUHANA:* Thank you, Judge.

17 *THE COURT:* No, thank you. I shudder to ask this,
18 anything else needs to come before the Court today? Mr.
19 Sachse?

20 *MR. SACHSE:* Nothing for GSK, your Honor. Thank you.

21 *THE COURT:* Ms. Finken?

22 *MS. FINKEN:* I don't believe so, your Honor.

23 *THE COURT:* I am doing this because this is the order
24 you are in on the screen. Mr. Shortnacy?

25 *MR. SHORTNACY:* No, your Honor, not for BI.

1 *THE COURT:* Ms. Finken, I am going to determine that
2 you out rank Mr. Watts and Ms. Luhana, so your response is
3 binding on all Plaintiffs.

4 I will excuse the parties. Thank you everybody, have
5 a good week.

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

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

8 * * *

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

11
12 Date: June 24, 2021

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

14 Signature of Court Reporter
15
16
17
18
19
20
21
22
23
24
25

Pauline A. Stipes, Official Federal Reporter

MR. SACHSE: [6] 3/16 33/16 38/1 44/6 47/16 54/19 MR. SHORTNACY: [21] 3/13 7/23 12/22 13/5 13/14 15/4 15/9 15/20 16/7 16/23 17/9 18/13 18/17 18/25 19/21 22/25 31/10 32/22 48/15 50/17 54/24 MR. WATTS: [20] 3/10 4/7 6/12 20/18 22/6 23/18 25/9 26/19 30/2 31/3 38/6 40/11 40/15 43/21 44/5 45/14 47/8 50/20 52/12 52/18 MS. FINKEN: [11] 3/8 38/9 38/12 40/14 45/21 47/11 47/24 51/5 51/8 54/21 55/5 MS. LUHANA: [12] 3/7 7/15 10/11 10/14 27/4 27/7 32/13 32/21 48/17 53/17 53/20 54/15 THE COURT: [63]	2000's [1] 42/5 2003 [1] 34/7 2010 [1] 6/15 2014 [1] 6/15 2016 [1] 5/4 2017 [3] 4/25 7/3 7/4 2019 [2] 27/16 46/8 2020's [1] 41/24 2021 [2] 1/5 55/12 21 [1] 1/5 210-447-0500 [1] 1/19 215-735-1130 [1] 1/13 215-994-4000 [1] 1/23 22 [1] 32/2 24 [1] 55/12 26 [1] 33/11 262 [1] 41/6 270,000 [1] 12/16 272 [1] 38/22 2924 [1] 3/2 2929 [1] 1/22	888-480-1113 [1] 1/16 9 90 [3] 18/10 30/5 43/10 A a value [1] 19/18 a.m [1] 40/19 ability [1] 30/7 able [8] 14/16 34/9 35/22 39/1 39/3 44/19 50/21 51/20 about [56] about 50 [1] 4/19 about what [1] 24/17 above [1] 55/10 abstract [1] 31/25 acceptable [2] 18/7 18/8 accomplish [1] 37/1 accomplished [1] 27/1 according [2] 27/9 38/23 account [1] 29/23 accurate [1] 51/21 accusing [1] 21/15 acknowledge [2] 45/12 46/19 acquisition [1] 6/20 across [2] 22/14 24/2 act [1] 12/13 acting [2] 24/15 53/11 actual [1] 36/22 actually [7] 10/20 14/6 27/11 39/10 40/15 46/15 51/20 ad [2] 5/23 38/20 add [2] 7/14 44/20 added [1] 4/18 addition [1] 27/14 additional [3] 12/16 35/13 39/5 address [3] 4/15 15/22 19/9 admit [1] 25/20 advance [1] 43/24 adverse [5] 17/2 33/23 33/24 37/15 37/19 afield [1] 36/25 after [9] 5/3 6/16 6/20 7/4 12/17 24/20 28/1 49/15 50/22 afternoon [7] 3/3 3/10 3/12 3/15 3/16 3/18 3/19 again [18] 9/10 21/24 23/3 25/21 28/2 29/2 29/11 30/3 30/21 31/1 32/5 35/5 35/9 44/23 49/9 49/17 51/5 51/24 against [1] 12/17 agenda [1] 48/22 ago [1] 40/18 agree [5] 9/21 25/10 26/20 34/19 50/19 agrees [2] 24/25 24/25 ahead [2] 13/5 51/8 ain't [2] 42/22 43/9 albeit [1] 40/2 all [73] allay [1] 29/3 allocation [1] 5/25 allow [3] 5/22 11/20 51/15 allowed [1] 33/9 along [5] 23/17 33/8 46/2 49/14 50/25
\$ \$40 [1] 41/16 \$40 billion [1] 41/16 ' '80's [1] 42/4 '90's [1] 42/5 . .1 [1] 17/21 .5 [1] 17/21 / /s [1] 55/13 0 0500 [1] 1/19 1 100 [1] 1/18 10016 [1] 1/15 1113 [1] 1/16 1130 [1] 1/13 1180 [1] 2/2 11:00 [1] 47/9 12th [1] 1/15 130 [1] 1/12 13th [1] 11/17 16 [1] 40/18 1600 [2] 1/12 2/2 16th [2] 30/7 30/12 18 [1] 43/23 18th [1] 1/12 19 [1] 44/1 19103 [1] 1/12 19104 [1] 1/23 1993 [1] 32/2 1st [7] 47/12 47/14 47/17 48/7 48/11 48/15 48/19 2 2 percent [1] 11/18 20-md-02924-ROSENBERG [1] 1/3	3 30 [7] 5/15 11/12 12/21 30/9 37/17 41/16 43/7 30309 [1] 2/2 32 [6] 24/6 42/20 42/24 44/3 46/1 48/10 3:00 [1] 40/19 4 40 [1] 5/15 40-year [1] 44/17 4000 [1] 1/23 404-572-4600 [1] 2/3 450 [1] 35/16 457 [7] 34/9 35/16 37/11 37/12 38/23 45/7 45/16 4600 [1] 2/3 465 [1] 45/17 467 [2] 41/7 45/15 483 [1] 27/14 4th [2] 47/3 47/7 5 50 [2] 4/19 5/23 500 [1] 33/22 6 600 [1] 1/15 61.2 [1] 45/15 63 [1] 10/15 65 [2] 18/13 18/17 65 or [1] 18/21 6th [1] 47/2 7 760 [1] 34/7 762 [2] 34/9 45/17 764 [1] 38/21 76ers [1] 38/8 772.467.2337 [1] 2/6 78257 [1] 1/19 8 80 [1] 18/9 85 [1] 18/13 85 percent [2] 18/17 18/21	

A already [20] 6/24 13/12 14/18 15/8 15/17 21/4 21/6 21/9 21/11 21/16 21/23 27/18 30/10 33/21 35/7 35/8 37/14 44/20 44/22 46/18 also [11] 8/14 8/25 17/16 17/17 19/16 23/8 33/22 33/23 38/8 40/21 40/24 although [1] 15/7 always [4] 9/8 15/16 23/2 35/12 am [67] among [2] 49/13 53/7 amount [1] 54/5 analysis [2] 17/19 25/15 analyst [1] 19/3 analytical [7] 4/11 5/17 6/5 8/6 10/20 15/4 31/25 Anapol [1] 1/11 anchoring [1] 17/3 and costs [1] 28/10 and Ms [1] 21/12 and you [1] 43/20 anniversary [1] 47/15 another [7] 20/2 35/24 37/9 38/23 43/9 47/1 52/16 answer [3] 14/21 16/9 52/4 answering [1] 14/13 answers [8] 11/6 11/10 12/10 12/21 32/8 51/18 51/21 53/25 anti [1] 40/25 anti-secretion [1] 40/25 Antonio [1] 1/19 any [14] 20/10 24/6 24/10 26/19 31/19 33/25 37/3 37/18 37/19 39/5 42/17 50/20 53/11 54/1 anybody [2] 49/17 53/17 anymore [1] 45/9 anyone [2] 28/7 46/17 anything [13] 5/11 7/14 9/22 19/20 21/19 30/21 32/19 36/2 37/20 40/18 42/14 47/23 54/18 anywhere [2] 10/6 39/8 apologize [2] 13/6 40/17 appeal [1] 43/20 appear [1] 14/6 appearances [1] 3/6 appreciate [2] 19/24 48/16 appreciative [1] 43/14 approaching [1] 43/6 approvals [1] 44/14 April [5] 10/17 10/17 10/25 11/9 11/17 April 13th [1] 11/17 Arch [1] 1/22 archive [1] 35/3 are [204] are entitled [1] 28/5 are producing [1] 22/4 argue [1] 19/4 argument [12] 6/4 6/5 9/17 21/21 21/22 21/25 22/1 29/4 29/4 29/5 30/9 44/10 arguments [1] 44/25	army [1] 43/22 around [1] 36/12 as [50] 4/25 8/10 8/16 9/9 9/21 10/5 11/6 12/20 13/12 13/15 13/16 15/9 18/3 19/20 27/1 27/23 27/23 27/24 28/23 28/24 29/8 30/12 30/12 34/8 35/8 35/23 35/24 37/14 37/24 38/19 38/22 40/9 40/13 41/3 41/5 42/2 42/12 44/13 44/25 45/12 45/13 45/13 45/13 48/3 48/7 49/16 50/2 50/2 50/25 54/3 ask [10] 7/10 13/2 13/3 13/4 42/14 44/2 48/1 48/4 48/12 54/17 asked [17] 6/2 9/9 10/10 16/10 19/19 22/3 22/4 25/6 39/2 39/5 39/23 40/2 41/11 45/4 48/22 51/2 51/18 asking [13] 8/4 8/23 9/6 16/16 16/18 16/21 17/5 17/23 22/20 30/23 42/14 50/12 50/14 aspersions [1] 53/17 assistance [1] 26/23 associate [1] 8/14 association [1] 8/18 assume [1] 52/3 at the [1] 33/2 Atlanta [1] 2/2 Atlantic [1] 22/14 attorneys' [1] 21/8 August [2] 30/7 30/12 August 16th [1] 30/7 available [7] 4/24 15/12 36/20 39/8 41/4 41/5 46/7 Avenue [1] 1/15 avoid [2] 31/20 31/22 avoiding [1] 31/16	be [74] BEACH [3] 1/2 1/5 2/6 Beate [3] 6/17 20/25 23/20 because [27] 5/13 11/7 12/5 12/6 14/6 15/10 15/15 16/9 19/8 20/11 20/21 21/14 21/23 22/22 27/10 28/16 28/17 30/6 30/17 31/14 33/5 38/20 43/11 44/11 44/17 54/4 54/23 Becker [1] 34/16 becoming [1] 34/6 been [46] 4/18 4/20 5/10 10/4 11/1 11/11 13/23 14/5 14/18 15/9 16/4 16/19 19/14 19/15 19/17 19/18 19/19 23/2 23/3 23/14 26/25 27/19 29/21 33/5 33/25 34/9 34/19 34/20 35/4 39/12 39/23 40/1 44/19 45/2 46/3 46/3 46/8 47/5 48/8 49/13 51/12 51/13 51/17 51/22 52/15 53/5 before [16] 1/8 4/25 6/4 7/3 7/18 8/7 13/4 24/6 24/7 35/1 35/19 42/11 47/13 47/24 48/11 54/18 begin [1] 3/6 beginning [2] 43/23 44/1 behalf [5] 3/9 3/12 3/16 3/17 51/10 being [6] 6/2 7/23 8/20 43/3 43/4 53/16 Belgium [1] 47/7 belief [1] 10/15 believe [9] 6/11 14/13 24/16 27/11 31/13 34/8 50/1 54/3 54/22 believing [1] 41/21 benefit [2] 5/25 25/11 best [1] 42/15 better [14] 19/6 20/2 25/3 25/7 30/23 31/25 32/4 32/9 32/19 33/7 37/9 40/23 41/19 54/10 between [6] 6/18 11/14 15/2 21/18 23/5 52/25 BI [56] big [2] 44/16 52/8 billion [1] 41/16 binders [1] 8/18 binding [1] 55/3 bit [8] 20/18 34/20 35/5 36/11 44/9 46/21 49/21 53/10 Bldg [1] 1/18 Boehringer [2] 5/1 5/2 boss [1] 38/7 both [8] 12/24 26/7 28/3 29/24 29/25 45/14 48/5 48/20 bottom [5] 4/15 4/23 21/9 30/9 41/6 bought [1] 5/3 box [2] 28/19 28/19 brand [1] 3/5 break [1] 50/7 breaking [1] 49/23 brief [2] 13/7 22/9 bring [2] 46/25 48/10 brought [1] 54/10 BRUCE [1] 1/8
B back [17] 7/11 8/5 11/21 12/1 17/3 20/1 20/16 26/23 27/16 28/1 29/13 32/10 32/25 48/1 48/5 48/6 49/13 backdrop [1] 7/16 baffling [1] 36/19 bags [1] 8/19 balancing [1] 28/10 ball [3] 26/19 38/12 51/23 based [4] 10/17 38/15 40/3 42/1 baseline [1] 9/24 bases [1] 6/13 basic [1] 4/10 basis [4] 17/25 24/16 44/14 49/12 batch [38] 6/8 8/3 8/5 8/7 8/11 9/2 9/5 10/5 10/7 10/16 10/20 11/17 11/18 11/20 11/21 11/22 11/25 12/5 12/9 13/17 13/22 14/3 14/7 14/10 14/20 14/25 15/9 16/1 16/2 16/5 16/13 17/4 17/9 17/18 17/22 18/12 18/22 29/13 batches [2] 11/25 15/14 Battle [1] 47/15		

B Brussels [1] 4/9 bulk [1] 25/6 burden [12] 5/20 5/21 6/4 6/4 9/16 9/16 12/18 21/14 21/16 22/15 30/13 50/3 burdens [3] 4/16 9/11 15/17 burdensome [5] 9/19 15/11 21/20 22/18 22/21 business [1] 13/17 button [1] 50/11 by study [1] 39/21	claim [2] 21/13 22/15 clarify [2] 20/17 49/19 clarity [1] 27/1 clear [8] 13/10 28/4 29/18 29/21 38/15 48/2 50/24 51/18 clearly [4] 13/23 22/2 26/7 46/12 clinical [19] 33/4 33/22 33/25 37/16 38/19 38/21 39/15 39/19 40/1 40/7 40/22 41/3 41/7 41/14 41/17 41/23 42/3 43/24 46/10 clips [1] 8/18 close [3] 11/16 33/14 35/2 closed [1] 26/4 closely [1] 35/2 closer [1] 53/6 closing [1] 44/10 closure [1] 46/25 co [1] 40/4 co-counsel [1] 40/4 coding [1] 8/8 colleague [1] 34/15 colleagues [1] 38/16 come [8] 7/10 14/9 32/10 39/22 42/18 48/1 48/5 54/18 comes [4] 17/16 24/7 29/18 33/9 coming [4] 29/12 33/25 37/19 45/11 comment [3] 30/3 41/25 52/13 comments [1] 53/3 committee [1] 52/16 common [2] 5/25 25/11 communicated [4] 7/3 22/14 23/22 24/2 communicates [2] 5/8 21/5 communicating [1] 5/2 communication [1] 5/4 companies [1] 46/9 comparator [1] 37/8 compared [1] 35/6 comparing [2] 34/24 37/8 compel [3] 33/12 40/13 40/14 compelled [1] 41/19 complaining [1] 30/4 complete [3] 6/1 8/9 34/2 completed [2] 35/20 50/23 completely [1] 9/5 compliant [1] 8/13 complies [1] 17/22 complying [2] 17/25 22/5 comprehensibility [1] 37/10 compression [1] 8/8 computer [1] 42/7 concede [1] 50/15 concern [3] 12/12 21/7 29/3 concerned [1] 33/5 concerns [1] 28/11 concluded [2] 35/21 55/7 conclusion [1] 24/20 conducted [1] 4/11 confer [5] 11/3 26/20 26/22 27/25 31/8 conference [3] 1/8 3/3 33/2 conferral [1] 24/21 conferred [2] 11/2 52/23 confers [1] 11/11	confident [1] 23/25 confirmed [1] 26/2 consistent [1] 36/8 consuming [1] 36/16 contain [1] 13/18 content [1] 11/5 continue [1] 41/20 continued [1] 11/22 continuing [3] 29/6 34/11 36/15 conventions [1] 36/7 conversation [13] 14/11 20/14 20/15 23/2 23/18 26/9 26/13 26/14 30/16 30/20 31/1 31/4 33/5 conversations [6] 24/19 28/12 38/14 38/16 38/25 40/3 converting [1] 31/5 cooperative [1] 43/16 copies [1] 19/13 copy [2] 6/10 16/15 correct [15] 10/13 13/7 15/4 15/5 16/24 18/11 18/18 18/25 19/1 19/20 19/22 23/1 44/11 46/5 55/9 correctly [3] 13/17 14/2 22/25 cost [1] 8/11 costs [1] 28/10 could [17] 4/3 6/3 7/9 7/22 10/1 13/13 16/2 17/2 20/7 21/1 27/22 35/22 39/8 39/24 40/12 48/4 53/25 couldn't [1] 41/12 counsel [3] 3/6 3/7 40/4 count [1] 34/8 counter [1] 13/20 country [1] 29/9 couple [2] 3/3 48/22 course [7] 13/10 14/13 27/7 34/5 36/6 37/2 53/20 COURT [20] 1/1 2/5 4/15 4/17 5/20 6/22 13/11 20/23 23/24 24/6 25/5 28/1 28/10 29/23 32/8 41/15 49/6 52/20 54/18 55/14 Court's [5] 20/19 26/23 28/3 28/22 48/9 criticism [1] 20/20 criticize [4] 22/5 29/8 46/23 53/4 criticizing [1] 46/22 cross [1] 39/14 crossed [1] 35/14 crux [1] 17/6 cumulative [1] 21/23 cycle [2] 46/10 51/3
C cabining [1] 16/3 calendar [1] 48/14 call [7] 3/1 10/9 16/13 38/5 40/20 51/7 52/16 called [3] 6/8 10/18 37/7 can [64] can't [17] 14/21 16/21 19/8 23/25 24/18 24/20 25/6 26/9 29/8 29/14 30/17 30/18 34/12 36/10 41/23 43/11 52/10 cancel [2] 49/2 49/14 canceled [6] 35/24 40/7 40/22 40/25 49/10 53/2 canceled [1] 52/14 cancellation [2] 48/24 49/4 cancer [2] 33/24 37/5 candidly [3] 12/24 25/5 43/4 care [1] 12/24 carried [1] 11/10 case [10] 1/3 3/1 3/1 27/13 41/13 41/17 43/16 45/20 49/11 54/13 casting [1] 53/17 category [1] 51/25 causes [1] 49/4 Centre [1] 1/22 certain [4] 13/21 14/4 16/17 54/5 certainly [2] 16/25 48/11 certificate [1] 17/19 certify [1] 55/9 cetera [1] 33/6 Chaffin [1] 1/14 challenges [2] 35/9 35/18 challenging [1] 25/2 character [1] 35/11 characterization [1] 35/25 cheap [1] 52/15 check [2] 45/23 48/7 check-in [2] 45/23 48/7 chemists [1] 34/4 chromatogram [5] 8/24 15/3 19/12 20/5 28/18 chromatograms [10] 8/4 9/9 10/19 13/22 14/16 17/11 27/6 27/8 27/16 28/16 Cira [1] 1/22 circle [6] 11/21 14/24 15/1 15/24 15/25 28/1 circles [1] 15/3 circuit [1] 7/19 cited [1] 5/21 City [3] 5/5 30/7 30/12		D data [57] database [12] 4/13 10/22 11/4 15/15 17/2 17/2 33/24 37/15 37/19 39/16 39/17 42/6 databases [8] 10/18 11/4 11/13 12/11 32/16 53/23 53/24 54/4 date [6] 7/17 38/22 47/6 47/24 53/1 55/12

<p>D</p> <p>dates [2] 48/14 53/2</p> <p>day [3] 38/20 47/5 47/7</p> <p>days [3] 30/5 30/9 43/10</p> <p>deadline [1] 47/1</p> <p>deadlines [2] 46/1 49/11</p> <p>deal [3] 12/25 20/10 31/6</p> <p>debate [3] 25/11 49/13 52/8</p> <p>Dechert [2] 1/21 3/17</p> <p>decide [2] 43/21 45/1</p> <p>decided [2] 12/3 45/9</p> <p>decision [1] 13/11</p> <p>deep [1] 39/9</p> <p>Defendant [4] 5/7 22/5 28/22 49/25</p> <p>DEFENDANTS [5] 1/21 3/5 28/8 28/24 53/14</p> <p>defer [1] 38/7</p> <p>deny [1] 24/1</p> <p>denying [2] 24/14 24/24</p> <p>depending [2] 14/4 19/2</p> <p>depends [2] 14/1 14/1</p> <p>depo [2] 25/1 40/14</p> <p>deposition [23] 6/14 6/17 6/19 6/23 20/24 21/3 22/10 23/20 23/22 23/24 26/21 37/17 40/20 49/2 49/2 49/7 49/10 49/14 52/16 52/21 52/25 53/6 53/7</p> <p>depositions [9] 43/25 48/23 48/24 50/22 52/14 52/22 52/23 53/13 53/15</p> <p>designee [1] 38/4</p> <p>destroy [1] 46/9</p> <p>destroyed [1] 46/14</p> <p>detail [2] 18/24 49/25</p> <p>detailed [9] 18/24 19/16 28/12 28/21 31/24 32/3 32/7 32/8 50/2</p> <p>details [1] 36/20</p> <p>determine [1] 55/1</p> <p>determining [1] 39/25</p> <p>diagram [1] 14/24</p> <p>dialogue [2] 37/25 50/16</p> <p>did [4] 11/22 23/12 38/18 46/15</p> <p>didn't [7] 7/12 12/1 13/12 29/12 39/13 40/17 49/8</p> <p>difference [1] 21/18</p> <p>different [12] 8/7 9/7 13/19 16/25 17/8 17/16 18/4 18/4 18/5 18/24 26/6 38/5</p> <p>difficult [4] 14/11 19/2 22/23 23/6</p> <p>dig [1] 43/4</p> <p>digging [2] 36/11 42/16</p> <p>digitize [1] 8/12</p> <p>digitized [1] 35/11</p> <p>direct [2] 49/24 50/7</p> <p>direction [1] 45/10</p> <p>directly [1] 42/12</p> <p>disagree [1] 7/20</p> <p>disagreement [3] 3/24 3/25 4/2</p> <p>disagrees [1] 28/7</p> <p>disappeared [1] 45/18</p> <p>disclosed [2] 10/25 11/1</p>	<p>disclosures [1] 10/25</p> <p>disconnect [1] 14/5</p> <p>discovery [6] 3/4 22/6 22/7 28/6 31/20 47/10</p> <p>discretion [1] 41/18</p> <p>discuss [2] 11/4 12/7</p> <p>discussion [10] 11/21 15/21 23/9 32/12 32/17 40/25 49/1 52/9 53/7 54/7</p> <p>discussions [2] 12/14 14/5</p> <p>dispute [1] 4/10</p> <p>disputes [1] 31/22</p> <p>distill [1] 4/3</p> <p>DISTRICT [2] 1/1 1/1</p> <p>dive [1] 39/9</p> <p>DIVISION [1] 1/2</p> <p>do [49] 6/2 7/20 11/13 12/4 15/10 16/2 16/7 19/24 20/4 21/8 21/10 21/24 23/8 24/5 24/15 25/13 25/14 25/17 25/22 25/22 27/11 28/1 28/25 29/19 32/7 32/10 32/19 33/10 35/17 36/15 40/17 41/18 41/23 42/17 42/23 42/24 43/11 43/13 44/5 44/6 45/4 46/18 46/24 47/19 48/11 50/4 50/5 50/14 52/11</p> <p>document [2] 9/13 36/22</p> <p>documentation [1] 36/5</p> <p>documents [21] 4/20 5/16 5/23 6/25 7/8 7/21 8/16 10/4 10/8 10/18 22/4 22/4 22/8 24/14 25/17 29/19 30/8 35/7 35/11 36/22 43/25</p> <p>Dodge [1] 52/15</p> <p>does [9] 14/22 15/7 24/16 35/15 36/11 46/12 47/12 48/7 48/15</p> <p>doesn't [5] 15/16 18/9 20/12 33/6 51/4</p> <p>doing [11] 12/6 15/17 25/22 30/1 30/1 34/22 34/23 35/4 42/15 47/5 54/23</p> <p>Domain [1] 1/18</p> <p>don't [52] 5/11 8/20 9/11 9/14 9/23 10/5 12/6 12/24 14/6 16/21 20/14 20/20 21/13 21/22 22/16 22/17 22/24 23/5 23/11 26/3 27/17 28/7 30/21 32/1 32/18 33/4 34/11 36/13 36/21 41/13 42/17 43/10 44/8 45/1 45/6 45/7 45/9 45/10 46/9 46/16 46/18 47/22 48/25 49/6 50/4 50/5 50/9 50/11 51/5 52/1 54/1 54/22</p> <p>don't hear [1] 22/16</p> <p>done [12] 8/20 9/12 21/11 27/15 31/18 33/10 34/12 37/3 42/22 43/19 43/20 46/4</p> <p>double [1] 34/22</p> <p>down [10] 4/4 24/17 29/11 29/18 36/17 39/24 40/15 46/21 47/24 53/6</p> <p>drawing [1] 36/16</p> <p>drill [1] 21/20</p> <p>Drive [1] 1/18</p> <p>dropped [1] 46/16</p> <p>drown [1] 21/20</p>	<p>drug [1] 41/16</p> <p>duplicative [3] 14/17 15/8 19/13</p> <p>duration [1] 39/7</p> <p>during [4] 11/10 39/10 39/18 46/10</p> <p>E</p> <p>each [3] 11/25 24/8 25/3</p> <p>earlier [2] 34/15 48/12</p> <p>early [1] 47/8</p> <p>earthquake [1] 42/6</p> <p>easier [5] 3/22 9/13 9/23 20/10 31/6</p> <p>Eastern [1] 40/19</p> <p>easy [3] 30/18 30/24 54/3</p> <p>effect [3] 6/16 6/20 9/6</p> <p>effectively [2] 8/12 8/24</p> <p>efficacy [2] 37/7 40/23</p> <p>effort [2] 33/11 37/24</p> <p>effort under [1] 33/11</p> <p>egging [1] 37/23</p> <p>either [10] 10/9 29/24 45/10 46/22 48/10 50/3 52/1 52/2 53/4 53/11</p> <p>electronic [48] 4/1 4/11 4/12 4/24 5/8 5/9 5/18 5/19 6/11 6/12 6/12 7/4 7/21 7/22 7/23 11/3 11/7 12/8 12/11 12/14 13/14 13/25 14/21 15/8 16/1 16/6 16/10 16/17 16/18 16/23 17/1 17/15 19/12 19/17 20/5 24/11 24/12 25/6 25/25 26/3 26/5 27/2 30/8 30/22 31/6 32/15 51/16 52/2</p> <p>electronic production [1] 12/8</p> <p>electronically [27] 4/12 5/2 7/9 9/19 9/20 9/22 9/23 9/25 10/1 10/2 10/6 13/23 14/3 14/17 15/2 21/5 21/8 21/10 21/15 22/12 22/14 24/16 25/1 27/16 29/20 30/11 30/16</p> <p>else [10] 10/9 13/25 18/23 19/20 28/20 36/14 37/20 39/8 47/8 54/18</p> <p>elude [1] 13/8</p> <p>emailing [1] 31/6</p> <p>emails [1] 21/12</p> <p>employee [1] 42/2</p> <p>Empower [4] 10/19 11/14 14/15 54/5</p> <p>encourage [2] 27/4 45/12</p> <p>encouraging [1] 46/17</p> <p>end [10] 5/4 7/1 10/17 10/24 11/9 26/14 45/5 52/21 52/25 54/3</p> <p>ending [1] 45/10</p> <p>engage [1] 23/15</p> <p>English [1] 41/23</p> <p>enough [7] 23/10 41/15 42/22 43/19 43/20 45/9 47/25</p> <p>entire [2] 38/10 45/20</p> <p>entitled [7] 25/24 28/5 28/8 42/8 43/18 45/2 49/5</p> <p>entries [8] 34/8 34/9 34/24 36/3 36/19 36/25 39/19 44/18</p> <p>entry [2] 36/4 36/9</p>
--	--	--

E envelopes [1] 8/18 equities [1] 28/3 ESI [4] 8/13 10/25 11/2 11/12 esophageal [1] 36/13 ESQ [5] 1/10 1/14 1/17 1/21 2/1 essential [1] 27/13 et [1] 33/6 ether [1] 45/19 ethical [2] 43/15 50/10 European [1] 41/22 evaluate [1] 23/6 evaluating [1] 35/3 even [6] 11/16 26/17 29/7 33/11 34/23 37/9 event [1] 37/19 events [5] 13/8 17/2 33/23 33/24 37/15 eventually [1] 45/11 ever [4] 21/19 23/12 36/21 49/6 everybody [2] 44/24 55/4 everyone [3] 9/21 43/14 47/8 everything [4] 4/4 12/4 24/12 54/11 evidence [5] 31/7 44/24 44/25 54/14 54/14 evidentiary [1] 24/16 exact [1] 50/11 exactly [9] 11/13 16/8 23/5 24/18 25/8 28/15 32/11 49/25 50/11 example [4] 13/22 17/1 17/19 19/12 examples [1] 22/19 Except [1] 22/7 excuse [3] 32/13 32/20 55/4 executive [1] 6/16 exist [12] 10/5 13/12 14/22 16/7 16/15 18/23 24/14 24/16 24/25 24/25 25/1 33/6 exists [14] 9/18 9/25 13/14 19/8 19/14 19/17 21/6 24/18 25/5 26/3 26/4 27/2 33/6 33/11 expect [3] 35/21 50/13 50/16 expectation [1] 28/23 expedite [1] 32/19 expensive [1] 28/9 experienced [1] 32/6 explain [3] 8/2 8/15 40/6 explained [2] 13/15 13/24 explanation [4] 41/2 41/4 42/2 42/4 explore [1] 20/13 exposure [1] 39/7 express [1] 14/9 extension [1] 43/7 eyes [1] 21/8	faith [3] 12/13 14/12 24/15 far [3] 15/4 36/25 39/24 fashion [2] 27/21 50/2 fast [2] 43/6 45/13 FDA [2] 27/15 27/19 Federal [2] 4/18 55/13 feel [2] 13/1 44/9 feels [1] 42/22 few [2] 20/7 35/13 fields [1] 39/6 fight [2] 40/13 45/19 figure [1] 46/6 file [9] 24/5 26/15 26/16 34/2 42/23 44/3 44/3 47/20 47/23 filed [1] 3/4 files [2] 8/15 42/7 find [12] 21/20 22/22 27/11 34/9 34/12 35/13 35/22 36/2 36/22 39/1 41/20 41/21 fine [1] 47/17 FINKEN [21] 1/10 3/9 5/22 21/12 25/14 32/25 33/2 34/15 34/19 37/25 38/3 38/5 38/9 40/20 47/4 47/20 48/13 51/8 51/9 54/21 55/1 firm [1] 6/1 first [30] 3/20 4/6 5/9 7/3 7/14 7/25 10/24 11/9 12/13 12/15 14/21 19/9 19/10 21/24 23/4 25/20 29/10 35/6 38/6 44/8 47/9 49/22 49/24 50/8 51/3 51/4 51/24 52/1 52/13 54/9 five [1] 38/11 FL [2] 1/5 2/6 flip [3] 30/7 30/15 43/1 Floor [1] 1/15 FLORIDA [1] 1/1 flowing [1] 18/3 focus [2] 10/11 28/23 focused [3] 34/6 37/2 37/7 focusing [1] 35/5 fold [1] 12/12 folders [1] 8/14 folks [2] 42/25 43/2 follow [1] 9/14 following [2] 40/17 49/1 forecast [1] 43/22 foregoing [1] 55/9 forget [1] 33/1 form [9] 8/17 10/16 10/22 12/20 13/21 14/21 17/13 17/15 17/25 formal [1] 32/18 format [36] 4/1 4/21 4/24 5/8 5/9 5/18 5/19 6/12 7/5 7/22 7/22 7/23 9/3 11/4 13/9 13/14 16/6 16/10 16/15 16/23 17/16 19/12 19/17 20/5 22/8 24/11 24/12 25/7 25/25 26/3 26/5 26/6 27/20 28/6 30/23 52/2 former [1] 41/21 forms [1] 8/6 forth [4] 25/2 26/13 27/4 49/13 fortune [1] 43/23	forward [5] 29/22 29/22 43/16 49/16 51/23 found [1] 45/7 frame [1] 54/6 framed [3] 13/16 14/2 14/15 France [3] 5/6 22/11 23/5 frankly [2] 36/8 36/19 free [2] 3/21 13/1 Friday [10] 6/14 20/25 21/1 23/20 24/1 24/3 25/19 26/21 31/7 52/17 friends [1] 5/11 fruitful [1] 32/17 fruitless [1] 23/10 Ft [1] 2/6 full [4] 27/9 27/10 27/11 38/20 full-day [1] 38/20 fully [1] 19/24 fulsome [1] 21/1 funnel [1] 53/25 further [2] 20/13 27/22 future [1] 49/9
F fact [8] 9/8 12/15 24/24 25/2 29/5 34/15 43/14 49/10 factual [1] 19/20 fair [3] 18/14 47/25 50/18		G GA [1] 2/2 games [1] 21/15 gave [3] 11/24 51/20 53/10 general [1] 9/21 generalizing [1] 19/23 generous [1] 43/7 genesis [1] 10/15 GERD [1] 36/13 Germany [6] 4/25 5/3 6/18 21/5 22/10 23/22 germinate [1] 20/22 get [43] 4/3 6/4 7/18 9/15 9/22 9/23 10/1 11/10 12/1 12/21 18/6 19/2 24/18 25/6 25/19 26/1 26/22 26/23 27/11 28/5 29/9 29/11 29/11 29/14 30/15 30/18 30/19 33/7 36/10 43/2 43/6 43/9 43/19 44/24 46/4 48/11 51/2 51/5 51/17 51/21 52/3 52/8 52/10 get is [1] 51/2 gets [5] 22/11 28/10 38/3 43/5 52/5 getting [12] 9/4 9/8 9/18 10/1 10/6 10/7 10/10 17/14 17/24 29/10 46/2 48/25 Gettysburg [1] 47/16 ginormous [1] 39/17 give [23] 7/16 12/10 24/10 24/12 25/7 26/14 26/16 29/13 30/22 30/24 31/10 37/22 37/23 40/16 46/17 47/6 50/4 50/5 50/15 50/21 52/6 52/7 52/20 given [7] 8/6 15/17 19/14 22/1 23/11 30/10 45/2 gives [1] 49/16 giving [3] 21/7 42/18 52/4 Glaxo [1] 42/2 global [1] 6/16 globally [1] 46/9 go [25] 7/13 13/5 20/16 21/20 22/22 25/2 25/12 26/13

G go... [17] 27/4 28/18 30/1 30/11 36/10 43/5 45/8 49/16 50/8 50/16 50/25 51/4 51/5 51/8 51/24 54/9 54/12 goal [2] 26/25 52/19 God [1] 21/16 goes [3] 29/18 38/6 49/22 going [45] 3/20 4/5 4/7 7/13 9/15 11/15 12/3 12/4 12/9 12/20 13/2 19/25 20/1 20/3 22/5 22/13 25/12 27/25 29/12 30/5 30/6 32/9 35/12 36/21 39/1 40/10 42/23 43/5 43/6 43/9 43/23 43/23 45/6 45/8 46/5 46/23 47/2 48/6 49/23 50/15 52/22 52/22 53/14 54/8 55/1 gone [6] 35/9 41/12 41/17 42/3 42/8 45/15 good [16] 3/10 3/12 3/15 3/16 3/18 3/19 5/25 12/13 14/12 20/6 24/15 24/15 32/6 41/15 48/13 55/5 got [8] 9/20 12/25 13/1 18/13 27/2 40/20 43/7 44/9 gotten [3] 5/5 11/6 43/11 granular [2] 18/23 19/16 graph [1] 20/11 great [5] 5/11 8/11 26/25 48/19 50/24 greater [1] 49/25 Greetings [1] 4/8 group [1] 41/19 GSK [14] 3/16 3/18 32/24 33/9 33/21 33/23 38/4 40/22 41/15 42/22 43/19 46/9 48/6 54/20 GSK's [1] 43/24 Guerra [3] 1/17 6/1 25/12 guess [2] 17/10 41/17 guidance [4] 46/1 49/16 51/19 53/10 guide [3] 31/2 31/3 54/6	24/18 28/25 30/19 32/11 41/21 46/19 53/2 Harvey [1] 40/14 has [42] 4/18 4/23 5/1 5/10 5/20 7/17 9/1 11/5 13/16 13/23 14/5 14/15 14/18 15/8 17/12 18/6 19/15 19/16 19/18 23/3 23/11 25/4 26/25 27/2 27/18 33/21 33/23 34/19 34/20 39/18 43/3 43/4 43/16 43/19 45/4 45/5 48/8 48/22 49/13 50/9 51/4 52/15 hate [1] 29/11 have [183] haven't [8] 10/9 26/17 34/20 40/1 42/17 43/11 44/19 50/12 having [6] 3/6 20/5 23/7 28/9 33/5 35/18 haystack [1] 5/17 he [18] 8/2 8/5 8/23 17/14 21/25 23/5 24/10 24/24 24/25 24/25 25/2 30/17 32/16 34/17 39/3 39/4 41/11 43/5 head [2] 14/24 30/15 headline [1] 34/10 health [1] 46/20 hear [19] 7/14 9/15 20/4 21/21 21/22 22/16 22/17 28/4 29/3 29/5 29/17 29/25 30/21 31/25 40/11 42/10 45/25 46/13 54/8 heard [4] 22/21 23/7 34/25 49/6 hearing [15] 7/25 9/17 23/3 24/8 24/9 38/20 39/18 42/21 43/10 44/24 47/9 47/19 47/21 48/12 55/7 heels [2] 42/16 43/4 height [2] 4/21 4/21 help [7] 13/13 20/12 28/24 31/3 39/24 40/5 53/9 helped [1] 20/17 helpful [4] 28/15 45/22 46/2 54/2 helps [2] 20/12 48/14 her [1] 34/15 here [35] 3/3 4/5 5/14 7/21 9/10 10/11 12/18 13/14 15/24 19/4 19/25 20/3 20/18 21/3 24/13 28/3 29/8 33/8 34/10 36/7 37/1 40/8 41/8 42/14 43/10 44/9 44/16 44/21 44/22 45/7 48/18 48/19 48/22 48/25 53/16 hey [3] 11/13 11/24 12/17 high [1] 42/2 him [5] 21/22 22/17 22/17 22/21 41/11 himself [1] 22/17 hired [1] 8/13 his [4] 9/11 22/5 30/15 41/4 history [1] 44/17 hit [2] 42/5 50/11 hold [3] 22/16 45/16 51/7 holiday [1] 47/13 home [1] 43/8 HON [1] 2/5 Honor [32] 3/15 7/24 8/7	8/23 12/23 13/6 13/7 13/16 14/2 16/25 19/22 23/8 23/11 31/11 32/23 33/17 38/13 38/19 39/17 44/7 45/22 46/11 47/12 47/18 48/16 50/18 51/6 51/20 54/20 54/22 54/25 55/6 HONORABLE [1] 1/8 hope [1] 47/11 hopefully [2] 12/20 32/16 hoping [2] 39/3 51/19 hornet's [1] 48/25 hours [3] 7/8 40/18 40/21 housed [1] 54/4 household [1] 38/10 houses [1] 14/16 how [28] 11/13 11/14 12/25 13/1 13/9 16/8 19/5 19/6 22/1 22/10 23/21 23/23 24/2 24/18 26/10 26/11 28/24 35/7 39/10 41/13 43/8 46/19 47/12 50/16 51/14 51/14 52/6 54/15 human [4] 38/19 38/21 39/15 39/25 hundred [2] 28/18 47/15 hundreds [4] 5/21 33/4 34/3 35/15 hurricane [1] 42/5 hypothetical [1] 18/22
H hacking [1] 42/7 had [28] 4/25 11/1 11/19 12/1 13/7 27/15 29/10 37/4 37/17 38/14 38/15 38/20 38/21 39/5 39/23 40/3 41/1 41/2 41/4 41/9 42/2 46/8 46/20 51/11 52/15 53/5 53/21 53/22 half [1] 26/16 hand [4] 28/5 28/8 29/15 29/17 hands [4] 34/12 35/8 37/13 44/22 handsomely [1] 25/18 happen [1] 52/22 happened [2] 11/1 46/6 happening [2] 5/10 5/12 happens [1] 49/12 happy [5] 5/22 7/14 31/3 47/1 47/22 hard [10] 6/10 16/15 19/5		I I'll [3] 3/7 26/17 47/5 I'm [4] 14/23 24/9 38/4 51/9 idea [4] 21/16 22/13 30/23 54/10 identified [3] 35/23 35/24 39/21 identify [4] 28/24 36/9 39/6 49/24 imagine [1] 34/19 important [1] 45/20 improperly [1] 53/12 impurity [2] 17/20 27/23 in paper [1] 30/10 incendiary [1] 14/8 include [2] 15/3 16/9 included [1] 9/2 includes [2] 15/25 33/24 increased [1] 37/4 incrementally [1] 36/16 index [1] 39/14 indicated [1] 23/12 indication [1] 37/3 individualized [1] 49/12 inference [1] 41/18 inform [1] 54/3 informal [1] 32/19 information [18] 12/8 13/18 13/21 15/11 15/18 17/12 17/25 19/13 23/4 23/16 23/21 23/23 24/2 37/13 40/2 40/8 51/1 51/13 Ingelheim [3] 5/1 5/3 5/3 input [1] 54/4 instance [2] 35/6 49/24 instead [2] 7/6 11/16 instinct [1] 20/19 intend [1] 12/21 interest [1] 49/23

I interested [1] 14/10 interim [3] 46/1 47/1 48/10 interject [1] 10/12 interplay [1] 11/14 interrogated [1] 15/15 interrupted [1] 13/4 intersection [2] 15/2 15/6 investigation [1] 27/14 involved [2] 28/10 47/23 involvement [1] 48/9 is [329] is maintained [1] 22/14 is really [1] 25/11 isn't [3] 14/2 20/10 46/13 issue [14] 8/1 16/21 17/6 29/2 30/12 30/13 32/21 32/24 42/11 46/20 46/24 48/2 49/11 51/12 issues [5] 31/17 40/6 46/21 50/20 52/9 it [229] it if [1] 22/19 it's [9] 12/12 18/23 18/24 19/16 19/16 46/14 47/13 50/9 54/12 items [1] 40/5 iterative [1] 51/3 its [1] 5/9 itself [1] 17/9	36/12 37/9 37/21 40/16 49/22 kinds [1] 53/12 King [2] 2/1 3/14 knew [1] 22/19 know [36] 4/7 5/18 5/22 6/6 9/11 12/3 16/21 21/3 22/8 23/5 23/10 24/2 26/11 27/17 32/1 32/2 32/18 36/13 36/13 37/11 40/17 40/18 40/19 40/21 40/24 41/2 41/13 42/9 42/10 43/8 45/8 45/21 46/16 50/9 50/11 53/1 known [2] 4/25 13/24 Kumbaya [1] 47/22	21/9 23/25 30/9 34/10 41/6 lines [3] 7/2 20/11 23/17 list [11] 17/2 17/20 34/24 35/6 35/14 35/16 35/20 36/17 36/25 52/22 52/23 listed [1] 38/22 listening [1] 49/20 listing [1] 39/14 literature [1] 17/1 litigation [3] 1/5 3/2 37/16 little [8] 20/2 20/17 24/3 35/5 36/11 46/21 49/21 53/10 live [2] 47/19 47/21 LLP [4] 1/14 1/17 1/21 2/1 locate [1] 44/19 located [1] 39/16 Logan [1] 1/11 logical [1] 52/3 logs [1] 31/20 London [1] 43/23 long [3] 39/10 49/1 51/14 longer [1] 41/4 look [16] 20/9 22/3 23/16 25/23 28/15 32/16 34/11 35/16 35/17 35/19 36/1 36/8 36/25 37/11 39/4 46/19 looked [1] 35/9 looking [16] 5/16 8/16 9/12 14/23 25/23 27/10 27/22 27/24 28/13 28/14 28/16 33/19 35/2 42/16 53/25 54/6 looks [2] 35/1 46/15 loop [1] 26/4 losing [1] 41/24 loss [2] 34/16 38/8 lot [9] 17/2 20/13 24/23 28/9 32/3 36/4 37/6 46/11 52/10 lots [5] 16/2 16/3 16/12 16/12 16/12 loud [2] 28/4 29/17 LUHANA [21] 1/14 1/14 3/8 6/7 7/12 13/3 13/4 13/15 14/12 20/9 20/16 21/13 25/13 28/14 32/10 33/2 48/4 48/17 50/20 53/20 55/2 Luhana's [1] 31/12
J Jaime [1] 52/15 Jane [2] 36/20 41/4 John [3] 40/20 41/1 42/1 jousting [1] 41/9 judge [22] 1/9 10/12 11/16 25/10 27/5 29/19 32/14 32/22 33/3 40/12 43/5 43/8 43/20 44/6 45/15 47/10 48/18 50/21 52/13 52/24 53/18 54/16 judgment [1] 19/18 July [12] 43/23 44/1 47/2 47/3 47/7 47/12 47/14 47/17 48/6 48/11 48/15 48/19 July 18 [1] 43/23 July 19 [1] 44/1 July 6th [1] 47/2 jump [1] 7/12 June [2] 1/5 55/12 jury [1] 44/8 just [39] 4/18 4/21 7/5 7/12 7/16 8/5 9/24 10/13 15/6 18/10 18/23 20/11 23/7 25/5 27/1 28/14 30/3 30/19 31/11 31/23 33/17 36/19 36/21 37/17 39/10 40/2 42/4 42/8 43/4 44/7 44/9 44/13 45/12 46/24 47/20 47/23 48/13 50/7 52/13	L lab [2] 19/3 34/3 label [1] 37/10 lack [1] 20/21 lacking [1] 23/3 language [2] 4/13 4/20 large [3] 40/24 43/22 44/19 last [15] 18/19 20/25 31/10 31/11 32/14 33/2 34/16 36/7 36/18 36/24 37/18 38/8 40/3 47/11 53/13 later [2] 10/17 31/1 latest [1] 34/17 latter [1] 16/24 law [1] 6/1 lawsuit [1] 54/10 lawyers [1] 30/5 learned [5] 10/17 10/24 11/9 36/6 42/1 least [7] 10/3 19/20 20/17 26/11 27/3 29/8 30/18 leave [4] 3/21 31/9 32/5 35/15 legitimate [2] 28/3 28/25 legitimate equities [1] 28/3 lend [1] 31/19 length [1] 39/7 lengthy [1] 39/18 less [4] 9/19 14/8 31/25 52/10 let [17] 3/1 3/6 8/1 15/6 16/7 18/2 18/19 20/16 22/16 28/2 33/15 33/17 40/6 40/16 47/4 48/4 50/24 Let's [2] 32/24 47/21 level [4] 18/24 20/4 42/2 52/5 levels [1] 8/5 LIABILITY [2] 1/5 3/2 liaison [2] 6/18 6/21 liaison between [1] 6/18 life [1] 46/10 like [23] 10/11 10/21 11/25 15/3 20/13 31/16 31/23 34/4 35/1 36/20 36/21 36/21 37/12 41/6 42/22 43/24 44/9 45/11 46/15 48/24 49/11 51/15 52/15 likely [1] 36/22 Limbs [4] 10/18 11/14 27/23 54/5 limiting [1] 51/1 line [8] 4/15 4/23 15/11	M machinery [1] 8/25 made [7] 29/20 33/10 33/20 34/20 35/21 41/16 48/8 magic [1] 50/12 MAGISTRATE [1] 1/9 maintain [3] 5/18 22/8 22/12 maintained [5] 7/6 12/20 13/18 22/14 51/14 maintains [3] 5/8 16/17 16/18 majority [2] 44/20 44/21 make [10] 3/6 9/12 13/10 17/20 19/5 21/24 23/8 23/19 25/16 48/7 makes [3] 7/7 29/4 48/13 making [5] 19/18 21/22 21/25 33/18 34/18 manager [1] 6/15 manually [1] 19/3
K keep [1] 22/22 keeping [1] 48/14 keeps [1] 51/8 kept [1] 15/1 kind [9] 4/4 34/5 34/22 36/2		

<p>M</p> <p>manufacturing [2] 13/19 17/3</p> <p>many [8] 4/16 19/1 35/7 39/19 39/19 39/19 42/13 42/13</p> <p>March [1] 33/6</p> <p>market [1] 46/8</p> <p>master [11] 7/13 26/22 31/2 32/6 42/13 48/13 48/22 52/14 52/20 53/4 53/9</p> <p>match [5] 35/2 35/2 36/3 36/11 36/22</p> <p>matches [1] 36/3</p> <p>material [1] 41/8</p> <p>materials [3] 29/6 29/9 35/3</p> <p>matter [2] 19/20 55/10</p> <p>matters [3] 3/5 44/22 47/10</p> <p>Mau [2] 6/14 20/24</p> <p>may [14] 4/1 10/8 14/4 15/3 15/7 16/17 26/4 30/25 31/17 31/20 44/8 49/18 53/13 53/19</p> <p>maybe [20] 3/25 4/6 7/18 20/2 20/6 20/6 20/9 24/3 25/8 28/17 31/19 34/21 34/23 35/5 36/12 39/24 45/23 48/3 51/22 53/5</p> <p>md [1] 1/3</p> <p>me [63]</p> <p>me it [1] 45/16</p> <p>mean [3] 5/11 7/12 51/4</p> <p>meaningful [4] 25/14 25/15 28/6 45/14</p> <p>meaningful analysis [1] 25/15</p> <p>meaningless [1] 25/13</p> <p>means [1] 32/1</p> <p>meant [2] 53/3 53/11</p> <p>measure [2] 18/4 18/6</p> <p>measurement [2] 18/16 32/3</p> <p>MedTrack [9] 34/7 34/25 35/6 36/9 36/13 37/6 38/21 39/6 44/18</p> <p>meet [6] 11/3 11/11 24/20 26/20 26/22 27/25</p> <p>member [1] 41/21</p> <p>mentioned [2] 35/19 37/14</p> <p>message [1] 43/13</p> <p>met [3] 11/2 12/17 52/23</p> <p>Mexico [5] 5/5 5/5 29/14 30/6 30/12</p> <p>Mexico and [1] 29/14</p> <p>MICHAEL [2] 2/1 3/14</p> <p>might [12] 5/25 20/12 35/22 36/3 36/9 37/22 39/18 39/25 40/5 40/8 47/8 53/9</p> <p>MIKAL [3] 1/17 3/11 40/15</p> <p>million [1] 29/19</p> <p>Mills [2] 36/20 41/4</p> <p>mind [1] 29/5</p> <p>minute [1] 53/13</p> <p>misconceptions [1] 38/15</p> <p>missing [8] 36/4 36/4 36/4 38/23 41/7 41/14 44/13 45/1</p> <p>modern [1] 9/22</p> <p>molecule [5] 5/4 6/20 37/2 37/4 37/8</p> <p>money [2] 52/8 52/10</p>	<p>month [2] 52/21 52/25</p> <p>months [7] 5/23 5/24 5/24 10/5 25/16 29/18 51/13</p> <p>more [24] 8/3 12/16 18/23 18/24 19/16 19/16 22/19 28/12 28/21 31/24 32/3 32/7 32/8 33/21 34/20 35/2 35/5 35/17 36/11 37/7 42/17 42/23 46/17 53/5</p> <p>most [3] 28/6 38/24 45/20</p> <p>motion [6] 24/1 24/6 26/15 26/16 40/13 44/3</p> <p>motions [1] 24/21</p> <p>mourning [2] 34/16 38/8</p> <p>mouth [1] 22/25</p> <p>move [3] 33/12 43/16 51/23</p> <p>moving [2] 43/2 46/2</p> <p>Mr [74]</p> <p>Mrs. [1] 51/8</p> <p>Mrs. Stipes keeps [1] 51/8</p> <p>Ms [12] 14/12 20/16 21/12 28/14 31/12 32/10 33/2 47/4 47/20 50/20 53/20 54/21</p> <p>Ms. [22] 6/7 7/12 13/3 13/4 13/15 20/9 21/12 32/25 33/2 34/15 34/19 37/25 38/3 38/5 38/9 48/4 48/13 48/17 51/8 51/9 55/1 55/2</p> <p>Ms. Finken [11] 21/12 32/25 34/15 34/19 37/25 38/3 38/5 38/9 48/13 51/8 55/1</p> <p>Ms. Luhana [10] 6/7 7/12 13/3 13/4 13/15 20/9 33/2 48/4 48/17 55/2</p> <p>Ms. Stipes [1] 51/9</p> <p>much [6] 19/6 26/11 28/23 32/20 34/21 52/6</p> <p>multiple [2] 51/18 51/19</p> <p>my [25] 4/19 5/10 5/24 6/24 7/7 14/24 14/24 15/24 18/21 21/16 23/20 23/22 26/25 27/3 30/5 34/15 37/22 38/10 38/25 40/12 43/13 49/15 52/19 53/3 54/9</p> <p>myself [1] 31/24</p> <hr/> <p>N</p> <p>name [3] 15/16 36/9 36/10</p> <p>named [2] 36/13 36/14</p> <p>naming [1] 36/7</p> <p>narrow [5] 12/7 27/22 39/24 45/12 53/25</p> <p>narrowed [1] 28/23</p> <p>narrower [1] 11/24</p> <p>nature [1] 39/11</p> <p>nauseam [2] 5/23 38/20</p> <p>NDA [1] 12/1</p> <p>NDMA [4] 27/11 28/20 31/13 32/3</p> <p>NDMA measurement [1] 32/3</p> <p>near [1] 15/11</p> <p>necessarily [3] 24/11 30/22 35/20</p> <p>need [29] 4/7 12/21 14/14 15/13 15/14 19/23 20/14 20/21 23/17 24/17 25/7 26/8 26/23 30/16 30/19 31/1 31/2 31/7 38/11 42/19 43/2 43/12</p>	<p>44/8 45/9 46/5 46/24 47/23 48/8 51/7</p> <p>needle [1] 5/16</p> <p>needs [4] 4/10 20/14 43/17 54/18</p> <p>negative [1] 41/18</p> <p>nest [1] 48/25</p> <p>neutral [1] 53/16</p> <p>never [4] 23/14 24/10 46/15 46/22</p> <p>new [2] 1/15 4/16</p> <p>next [6] 17/21 26/23 45/6 45/8 45/23 52/5</p> <p>nice [2] 43/4 43/8</p> <p>night [3] 34/16 38/9 47/7</p> <p>nine [1] 40/21</p> <p>nitrosation [1] 41/11</p> <p>no [21] 1/3 7/24 12/9 16/11 16/11 20/10 24/14 26/14 31/14 32/9 41/2 41/3 41/4 41/11 42/2 42/4 42/23 45/4 53/3 54/17 54/25</p> <p>no nitrosation [1] 41/11</p> <p>Noah [1] 34/16</p> <p>nobody [3] 42/14 43/12 52/4</p> <p>none [1] 50/6</p> <p>nonsense [1] 22/15</p> <p>normative [1] 19/7</p> <p>not [101]</p> <p>not accusing [1] 21/15</p> <p>note [2] 37/17 44/8</p> <p>notebook [1] 46/16</p> <p>notebooks [1] 34/3</p> <p>nothing [4] 4/22 16/2 26/15 54/20</p> <p>notice [3] 11/12 47/20 47/24</p> <p>notices [2] 3/4 3/23</p> <p>notorious [1] 34/6</p> <p>now [30] 5/22 12/12 15/10 15/24 17/5 19/10 20/2 25/4 25/7 26/2 26/7 26/8 26/11 26/13 26/17 26/25 29/12 29/13 30/10 33/15 34/6 35/5 35/14 41/15 45/19 45/23 49/3 50/9 51/12 52/25</p> <p>number [15] 3/1 4/24 6/14 13/16 16/25 17/21 18/21 31/19 36/1 39/19 39/21 40/19 44/16 44/18 44/19</p> <p>numbers [1] 39/20</p> <p>numerical [1] 9/1</p> <p>NY [1] 1/15</p> <hr/> <p>O</p> <p>object [1] 30/25</p> <p>objecting [1] 30/25</p> <p>objection [4] 15/7 16/20 21/10 29/1</p> <p>obligation [2] 50/10 50/10</p> <p>obligations [1] 22/6</p> <p>obviously [7] 29/4 31/21 45/18 45/20 50/9 50/25 51/25</p> <p>occasions [1] 53/5</p> <p>occur [2] 20/14 53/7</p> <p>occurred [1] 49/20</p> <p>OCR [2] 9/13 35/11</p> <p>of that [1] 37/19</p> <p>off [3] 3/21 35/14 41/16</p>
--	---	--

<p>O</p> <p>office [4] 4/19 5/14 7/7 25/12</p> <p>official [3] 2/5 8/10 55/13</p> <p>often [3] 4/13 5/20 19/2</p> <p>oh [3] 20/10 21/16 45/7</p> <p>okay [11] 7/10 10/16 15/20 17/7 32/18 38/1 40/10 40/16 42/10 45/21 52/18</p> <p>old [1] 35/10</p> <p>once [1] 30/23</p> <p>one [45] 1/11 4/4 4/25 6/14 6/23 11/25 13/22 17/10 18/19 20/1 24/14 27/5 28/5 28/19 29/15 30/3 31/11 31/15 31/21 32/14 34/23 35/9 35/18 36/9 36/10 36/11 36/11 37/8 38/4 38/16 39/5 40/19 41/25 43/3 43/9 43/17 45/4 48/2 48/12 51/1 51/6 51/11 52/17 53/5 53/18</p> <p>one-to-one [1] 36/11</p> <p>ones [2] 39/23 39/25</p> <p>ongoing [2] 37/24 37/24</p> <p>only [8] 5/13 6/9 7/2 8/13 11/18 13/7 21/8 54/4</p> <p>open [3] 29/5 31/22 48/25</p> <p>optical [1] 35/11</p> <p>order [6] 20/24 26/10 43/12 43/12 54/9 54/23</p> <p>ordering [1] 49/7</p> <p>ordinary [1] 13/10</p> <p>original [1] 8/17</p> <p>other [26] 17/9 17/17 18/7 19/15 22/3 24/9 25/3 28/8 29/17 29/20 30/3 31/21 33/11 34/4 34/21 35/4 36/6 43/3 43/17 45/19 48/2 48/21 49/1 49/4 49/5 49/19</p> <p>otherwise [1] 31/7</p> <p>ought [1] 33/14</p> <p>our [13] 12/12 12/18 34/12 35/9 37/15 37/17 37/17 42/16 47/9 47/11 51/15 52/14 54/13</p> <p>out [12] 4/13 26/12 29/9 30/11 33/25 37/14 37/19 42/6 42/8 45/17 46/6 55/2</p> <p>outline [1] 6/24</p> <p>outlines [1] 21/4</p> <p>outside [1] 15/25</p> <p>outstanding [5] 32/15 39/9 40/1 53/22 53/22</p> <p>over [11] 4/22 7/12 13/20 19/23 35/22 36/6 38/3 38/14 39/13 39/18 47/7</p> <p>over you [1] 38/3</p> <p>over-the-counter [1] 13/20</p> <p>overall [1] 36/1</p> <p>overburdened [1] 28/9</p> <p>overlap [1] 11/8</p> <p>overlaps [1] 26/5</p> <p>own [1] 29/22</p>	<p>packaging [1] 8/8</p> <p>page [3] 7/2 23/24 33/18</p> <p>pages [3] 4/14 5/16 12/16</p> <p>paid [4] 25/18 43/6 52/8 52/10</p> <p>PALM [3] 1/2 1/5 2/6</p> <p>paper [25] 8/11 9/3 10/7 10/8 10/16 11/7 13/12 13/12 13/18 14/18 14/25 15/25 21/11 21/13 21/14 21/17 21/23 23/11 27/2 29/6 29/19 30/4 30/6 30/10 35/10</p> <p>paper-wise [4] 21/11 21/13 21/14 21/17</p> <p>papers [1] 34/5</p> <p>part [8] 8/24 15/9 15/24 16/24 17/22 23/20 23/22 41/19</p> <p>participate [1] 14/12</p> <p>particular [4] 28/16 46/20 49/4 51/12</p> <p>particularly [1] 49/10</p> <p>parties [12] 11/3 32/13 32/20 42/12 46/19 46/23 49/13 51/20 52/7 53/8 53/10 55/4</p> <p>parties if [1] 53/10</p> <p>partner [2] 4/25 41/4</p> <p>partners [1] 5/9</p> <p>parts [3] 13/22 14/2 17/17</p> <p>party [3] 49/2 49/2 49/14</p> <p>passed [3] 18/9 18/10 18/12</p> <p>passes [1] 18/8</p> <p>past [4] 6/6 21/19 24/8 38/14</p> <p>Pauline [2] 2/5 55/13</p> <p>pdf [4] 4/20 8/22 9/13 31/5</p> <p>pdf'ing [1] 5/12</p> <p>pdf's [4] 4/14 7/7 25/13 25/17</p> <p>Peachtree [1] 2/2</p> <p>peaks [2] 8/24 17/12</p> <p>pending [1] 3/4</p> <p>people [9] 4/19 5/15 5/23 39/10 43/22 44/1 48/1 48/6 49/20</p> <p>per [2] 11/2 12/21</p> <p>percent [9] 11/18 17/21 17/21 18/9 18/10 18/17 18/17 18/21 45/15</p> <p>percentage [1] 25/11</p> <p>performed [1] 9/2</p> <p>Personally [1] 37/21</p> <p>perspective [2] 4/7 28/3</p> <p>pharmaceutical [1] 41/13</p> <p>Philadelphia [2] 1/12 1/23</p> <p>phrase [1] 17/7</p> <p>physical [2] 15/25 19/13</p> <p>pick [2] 35/12 47/5</p> <p>picture [3] 27/10 27/10 27/12</p> <p>pieces [3] 13/21 13/21 14/11</p> <p>PIER [5] 34/25 36/10 36/14 39/14 39/16</p> <p>Pierce [1] 2/6</p> <p>Pierce/West [1] 2/6</p> <p>pipeline [1] 12/5</p> <p>place [2] 11/5 29/10</p>	<p>placebo [1] 40/22</p> <p>Plaintiff [4] 19/6 53/5 54/10 54/13</p> <p>PLAINTIFFS [48] 1/10 3/7 3/8 3/9 3/11 4/2 4/3 9/18 10/1 10/6 13/24 14/6 14/6 14/9 15/13 16/4 17/4 17/23 20/4 20/17 21/17 22/2 23/16 24/11 24/15 28/5 28/21 29/7 29/7 29/12 29/17 31/18 33/12 33/19 35/23 37/14 42/17 42/20 42/23 43/18 45/2 45/8 49/24 50/8 51/1 51/10 51/24 55/3</p> <p>Plaintiffs' [6] 29/3 35/8 37/13 44/21 52/16 53/15</p> <p>planned [1] 35/23</p> <p>plant [3] 6/15 23/13 31/12</p> <p>platform [1] 9/7</p> <p>players [1] 38/11</p> <p>pleasure [1] 47/4</p> <p>plus [2] 17/4 35/16</p> <p>point [24] 5/7 7/1 9/14 11/18 15/2 15/7 15/21 17/9 20/6 23/8 23/9 33/8 33/9 33/15 33/15 34/11 41/12 43/3 43/16 45/4 46/5 46/24 50/18 53/18</p> <p>points [4] 8/8 14/4 18/4 28/18</p> <p>pond [1] 24/2</p> <p>portion [1] 3/20</p> <p>posing [1] 51/22</p> <p>position [1] 32/9</p> <p>precisely [1] 28/13</p> <p>preclinical [1] 33/22</p> <p>precursor [1] 41/22</p> <p>prejudice [3] 49/4 49/17 50/25</p> <p>prejudiced [1] 52/4</p> <p>premature [1] 24/3</p> <p>premise [1] 7/21</p> <p>prepared [1] 21/4</p> <p>present [1] 44/24</p> <p>presumably [1] 27/19</p> <p>pretty [2] 33/14 36/25</p> <p>preview [1] 44/9</p> <p>previously [3] 8/1 10/25 53/21</p> <p>principle [1] 9/21</p> <p>print [4] 4/13 22/15 27/8 27/9</p> <p>printed [3] 10/21 17/11 17/13</p> <p>printing [2] 10/22 13/8</p> <p>printout [1] 7/7</p> <p>printouts [1] 19/12</p> <p>priority [1] 38/3</p> <p>probably [2] 38/19 53/14</p> <p>problem [2] 41/8 53/3</p> <p>problems [1] 51/11</p> <p>procedural [1] 48/23</p> <p>proceed [3] 29/22 29/22 54/15</p> <p>proceedings [1] 55/10</p> <p>process [6] 8/8 13/19 18/3 36/16 49/15 51/3</p> <p>produce [22] 4/10 4/14 5/19</p>
<p>P</p> <p>p.m [1] 47/9</p> <p>PA [2] 1/12 1/23</p> <p>package [1] 8/9</p>		

<p>P</p> <p>produce... [19] 8/12 11/22 11/25 12/4 12/9 13/11 19/5 22/7 22/18 22/22 23/24 28/9 28/25 29/6 29/15 29/16 29/20 30/4 32/17</p> <p>produced [30] 7/22 7/23 11/18 11/19 12/7 12/16 14/17 15/9 16/20 16/25 19/15 19/17 19/19 19/19 21/14 21/17 21/19 21/23 23/23 27/15 27/20 29/19 33/21 33/23 33/23 34/2 34/3 35/7 38/22 44/21</p> <p>producing [14] 6/10 7/6 10/23 11/17 15/7 16/14 16/14 16/20 21/13 22/2 22/4 29/7 33/12 39/1</p> <p>product [4] 3/2 44/17 46/8 46/11</p> <p>production [15] 4/16 11/5 12/8 12/14 13/9 16/5 16/12 16/13 16/19 16/23 27/18 35/3 35/9 38/17 45/24</p> <p>production and [1] 4/16</p> <p>PRODUCTS [1] 1/5</p> <p>professional [2] 43/15 50/10</p> <p>progress [4] 33/20 34/18 34/20 48/8</p> <p>project [1] 15/16</p> <p>Promeco [9] 5/1 5/5 6/15 6/18 7/2 7/6 10/16 21/4 22/11</p> <p>promise [3] 18/20 23/6 24/1</p> <p>proof [1] 20/24</p> <p>proper [1] 53/8</p> <p>proportional [2] 21/24 28/6</p> <p>proportionality [2] 4/16 5/20</p> <p>proposal [2] 11/24 12/4</p> <p>propounded [1] 16/11</p> <p>protocol [2] 11/2 39/20</p> <p>prove [5] 22/9 23/21 23/23 23/25 24/24</p> <p>provide [1] 39/3</p> <p>provided [3] 14/18 34/17 40/2</p> <p>providing [2] 5/13 34/14</p> <p>proving [1] 25/2</p> <p>PTO [9] 8/13 10/15 24/6 42/20 42/24 43/7 44/3 46/1 48/10</p> <p>publication [1] 41/1</p> <p>Puerto [5] 4/19 5/13 7/7 25/12 30/5</p> <p>pulled [3] 27/17 27/19 39/23</p> <p>purpose [1] 8/22</p> <p>pursuant [1] 3/4</p> <p>push [1] 31/5</p> <p>put [5] 10/20 19/3 22/24 24/6 31/17</p>	<p>19/10 25/5 37/18 49/6 54/11</p> <p>questioning [1] 52/5</p> <p>questions [11] 13/3 14/13 31/17 32/8 32/15 46/11 48/23 51/15 51/21 53/22 53/22</p> <p>quick [1] 48/5</p> <p>quickly [2] 26/10 45/12</p> <p>quit [2] 21/13 47/8</p> <p>quite [2] 37/23 51/22</p> <hr/> <p>R</p> <p>raise [2] 27/5 53/18</p> <p>raised [2] 8/1 53/21</p> <p>raises [1] 46/11</p> <p>ran [2] 32/2 46/15</p> <p>RANITIDINE [5] 1/4 3/2 4/12 28/20 37/12</p> <p>rank [1] 55/2</p> <p>raw [5] 17/5 17/7 18/15 27/12 28/17</p> <p>re [2] 1/4 3/2</p> <p>reach [3] 19/9 23/9 24/20</p> <p>reached [1] 19/7</p> <p>react [1] 22/1</p> <p>read [4] 4/4 25/13 30/5 43/25</p> <p>readily [1] 15/12</p> <p>reading [6] 3/25 4/20 5/15 5/23 7/8 25/16</p> <p>real [2] 41/7 48/5</p> <p>realize [1] 48/21</p> <p>really [13] 12/24 14/14 17/5 20/10 20/12 20/12 25/11 32/7 39/8 40/12 44/22 47/22 50/14</p> <p>reasonable [1] 33/10</p> <p>reasonably [3] 10/22 12/19 27/19</p> <p>reasons [2] 4/24 53/12</p> <p>recall [1] 39/18</p> <p>receive [1] 38/18</p> <p>recent [1] 38/24</p> <p>reciprocal [1] 4/18</p> <p>recitation [1] 13/8</p> <p>recognition [1] 35/12</p> <p>recommended [1] 27/25</p> <p>record [15] 8/10 10/13 11/25 13/12 13/17 15/18 17/9 17/18 17/22 18/12 18/22 21/2 29/21 44/11 55/10</p> <p>records [43] 4/1 6/6 6/8 7/4 8/3 8/5 8/10 8/12 8/14 9/2 9/5 10/5 10/7 10/16 10/20 11/17 11/18 11/20 11/21 11/23 12/5 12/10 12/15 13/9 13/17 13/22 14/3 14/7 14/10 14/20 14/25 15/9 16/1 16/1 16/2 16/5 16/13 16/17 16/18 17/4 24/10 29/13 54/12</p> <p>recur [1] 53/14</p> <p>reduced [1] 5/21</p> <p>reference [1] 14/9</p> <p>referencing [1] 39/15</p> <p>referring [1] 10/4</p> <p>regard [1] 35/17</p> <p>regular [1] 34/14</p> <p>regulatory [1] 34/2</p> <p>REINHART [1] 1/8</p> <p>relate [2] 33/24 39/19</p>	<p>related [1] 37/19</p> <p>relating [4] 3/5 37/15 40/7 44/15</p> <p>relative [2] 5/24 9/11</p> <p>relevant [4] 31/13 37/16 39/25 40/8</p> <p>remedy [8] 42/18 42/19 42/20 42/21 43/18 49/5 49/9 49/17</p> <p>remembers [1] 38/19</p> <p>reminds [1] 20/20</p> <p>repeating [1] 21/11</p> <p>rephrase [1] 14/8</p> <p>report [2] 35/21 35/22</p> <p>Reporter [3] 2/5 55/13 55/14</p> <p>reports [1] 34/25</p> <p>represent [1] 8/6</p> <p>representative [2] 11/25 20/7</p> <p>request [5] 29/16 44/4 50/22 51/1 52/19</p> <p>requested [2] 16/4 29/6</p> <p>requesting [2] 39/12 51/13</p> <p>requests [6] 16/5 16/11 16/13 16/19 16/22 51/15</p> <p>requires [1] 11/3</p> <p>rescheduled [1] 53/13</p> <p>resides [1] 9/6</p> <p>resolve [2] 31/17 46/24</p> <p>respect [3] 5/6 5/17 40/25</p> <p>respectfully [2] 4/17 41/13</p> <p>respects [4] 17/10 19/1 34/21 34/21</p> <p>respond [6] 8/1 12/23 13/2 32/4 44/4 44/7</p> <p>responded [1] 14/19</p> <p>responding [1] 9/10</p> <p>response [5] 29/16 46/12 52/1 52/3 55/2</p> <p>responses [2] 32/16 51/21</p> <p>responsive [2] 16/19 16/22</p> <p>restore [1] 15/11</p> <p>result [1] 49/18</p> <p>retained [1] 51/14</p> <p>retrospectively [1] 27/17</p> <p>review [3] 9/14 9/19 11/20</p> <p>reviewed [3] 3/23 14/7 39/23</p> <p>reviewers [1] 9/12</p> <p>reviewing [1] 9/11</p> <p>Rico [5] 4/19 5/13 7/7 25/12 30/5</p> <p>right [12] 10/11 12/12 15/10 17/10 19/25 20/19 23/9 23/25 25/7 26/17 31/9 52/6</p> <p>ripe [1] 24/4</p> <p>risk [3] 29/23 37/4 41/11</p> <p>river [1] 46/16</p> <p>road [3] 29/11 29/18 33/8</p> <p>ROBIN [1] 2/5</p> <p>ROOPAL [3] 1/14 3/8 25/13</p> <p>ROSENBERG [6] 1/3 2/5 33/3 43/8 43/21 52/24</p> <p>ruin [1] 47/2</p> <p>rule [18] 4/16 4/18 6/22 20/14 20/21 24/7 24/22 26/15 26/17 32/9 33/11 33/13 40/10 42/21 42/24 43/12 43/19 44/4</p> <p>rules [3] 4/18 5/20 22/7</p> <p>ruling [4] 25/23 29/2 29/24</p>
<p>Q</p> <p>quality [2] 6/16 6/18</p> <p>question [18] 6/10 9/16 9/16 9/24 13/25 14/1 14/15 14/19 14/20 18/19 19/7 19/9 19/9</p>		

<p>R</p> <p>ruling... [1] 43/6</p> <p>Russian [1] 42/7</p> <p>S</p> <p>SACHSE [18] 1/21 3/17 3/21 32/25 33/16 38/13 38/25 39/3 39/13 40/4 40/14 42/15 45/6 45/16 46/2 46/13 46/20 54/19</p> <p>Sachse's [2] 38/16 41/19</p> <p>safety [5] 37/2 37/12 37/15 37/18 44/15</p> <p>said [22] 11/24 12/6 12/9 18/17 21/10 22/2 22/3 23/15 28/15 29/7 30/15 31/23 33/3 33/8 37/24 39/4 41/10 42/7 42/12 42/18 49/7 50/12</p> <p>same [8] 5/4 6/9 7/5 24/19 33/18 34/14 41/23 48/18</p> <p>samples [1] 22/18</p> <p>sampling [1] 20/7</p> <p>San [1] 1/19</p> <p>Sanofi [7] 5/3 5/6 5/9 6/21 6/21 7/3 21/5</p> <p>saw [2] 30/14 41/10</p> <p>say [37] 6/5 7/24 12/17 13/7 14/10 15/16 17/15 17/21 18/9 18/12 18/13 18/15 20/10 20/12 21/13 22/7 23/9 28/15 29/2 32/1 32/10 33/9 34/12 34/18 34/19 35/17 36/18 36/24 41/16 43/5 45/6 49/1 50/3 50/13 51/6 51/25 54/1</p> <p>saying [15] 8/2 8/21 21/19 22/17 22/21 23/12 23/14 23/15 24/10 24/11 25/24 30/22 42/15 42/17 45/25</p> <p>says [9] 14/12 18/8 26/14 26/15 28/20 28/20 28/20 32/9 41/15</p> <p>says we [1] 26/15</p> <p>scan [1] 8/14</p> <p>scanning [1] 8/21</p> <p>schedule [2] 52/21 52/25</p> <p>scheduled [2] 44/1 52/24</p> <p>Scheidweiler [4] 6/17 6/25 20/25 23/21</p> <p>science [1] 44/1</p> <p>scientific [1] 25/14</p> <p>scientists [1] 34/5</p> <p>scope [1] 11/4</p> <p>Scotland [1] 42/5</p> <p>SCOTUS [1] 20/20</p> <p>scrambled [1] 10/17</p> <p>screen [2] 3/21 54/24</p> <p>search [2] 9/23 39/22</p> <p>searching [3] 36/12 39/1 39/16</p> <p>second [9] 6/3 12/19 14/21 19/9 21/25 22/17 39/12 44/11 48/2</p> <p>secretion [1] 40/25</p> <p>see [15] 4/23 18/2 31/15 33/16 35/7 36/12 36/20 38/2 39/10 39/16 45/10 45/24 46/13 46/19 52/24</p> <p>seed [1] 31/11</p>	<p>seeing [2] 8/16 36/3</p> <p>seek [1] 40/9</p> <p>seeking [1] 49/17</p> <p>seem [2] 36/21 36/25</p> <p>seemed [1] 3/24</p> <p>seems [5] 9/17 24/23 33/14 41/6 50/13</p> <p>seen [1] 4/15</p> <p>send [2] 20/1 31/5</p> <p>sense [3] 25/8 33/7 48/7</p> <p>sentence [1] 4/4</p> <p>separate [4] 9/5 10/8 15/1 49/5</p> <p>September [2] 32/2 53/1</p> <p>sequencing [1] 25/8</p> <p>served [2] 11/12 44/13</p> <p>session [1] 41/9</p> <p>set [2] 47/1 47/21</p> <p>sets [1] 49/2</p> <p>setting [1] 49/15</p> <p>several [3] 10/5 36/7 38/14</p> <p>shaking [1] 30/14</p> <p>shared [1] 23/5</p> <p>she [6] 6/7 6/21 31/3 38/4 38/4 43/21</p> <p>Sheehan [1] 40/4</p> <p>sheet [4] 34/7 35/19 37/6 44/18</p> <p>shocked [1] 42/1</p> <p>shoot [1] 38/12</p> <p>shopping [1] 54/12</p> <p>short [1] 7/18</p> <p>SHORTNACY [26] 2/1 3/14 5/10 6/7 7/15 7/20 13/2 13/5 13/13 19/21 21/9 21/15 22/24 24/9 25/4 26/2 26/21 30/14 31/10 32/15 48/4 48/15 50/17 51/18 53/23 54/24</p> <p>should [8] 4/3 19/5 19/19 26/1 28/24 41/19 47/19 50/5</p> <p>show [9] 6/23 6/24 20/7 20/24 21/12 26/21 28/17 31/6 31/13</p> <p>showing [1] 40/23</p> <p>showing better [1] 40/23</p> <p>shudder [1] 54/17</p> <p>side [11] 22/3 29/24 43/1 43/3 46/22 48/10 49/4 49/5 53/4 53/11 53/15</p> <p>side for [1] 46/22</p> <p>sides [4] 26/7 28/3 29/24 45/14</p> <p>Signature [1] 55/14</p> <p>significant [1] 11/8</p> <p>similar [2] 15/4 27/20</p> <p>simple [2] 31/16 51/14</p> <p>simply [1] 33/9</p> <p>since [3] 27/18 33/6 48/6</p> <p>single [1] 37/18</p> <p>sir [2] 4/8 6/13</p> <p>sit [2] 24/17 29/8</p> <p>situation [1] 29/11</p> <p>six [1] 18/6</p> <p>Sixer's [1] 34/16</p> <p>slow [1] 34/19</p> <p>slowed [1] 46/21</p> <p>snapshot [1] 34/7</p> <p>so [77]</p>	<p>sobeit [1] 49/17</p> <p>some [47] 4/1 4/2 10/19 16/12 17/4 17/9 19/11 20/4 20/5 22/18 23/16 24/20 25/8 25/25 30/18 30/19 31/20 33/8 34/21 35/10 35/23 35/23 36/18 37/7 37/10 37/22 38/15 39/9 40/3 40/6 40/7 42/6 42/7 43/16 46/1 46/5 46/12 46/13 46/20 46/24 47/21 49/13 49/25 50/6 51/22 53/7 53/22</p> <p>somebody [6] 22/10 22/11 43/13 43/17 44/23 51/4</p> <p>someone [2] 49/7 49/10</p> <p>something [17] 9/4 9/17 9/25 10/9 13/11 18/7 22/13 23/12 28/20 33/3 35/1 36/12 36/14 42/13 43/13 47/15 51/17</p> <p>Sometimes [1] 20/21</p> <p>somewhere [3] 18/23 45/21 49/14</p> <p>sophisticated [2] 8/25 41/9</p> <p>sorry [3] 10/12 38/4 51/9</p> <p>sort [8] 17/5 17/15 17/25 28/2 34/10 35/16 36/2 36/16</p> <p>sounds [1] 34/4</p> <p>source [3] 9/6 17/24 17/24</p> <p>sources [1] 17/1</p> <p>SOUTHERN [1] 1/1</p> <p>Spalding [2] 2/1 3/15</p> <p>Spanish [9] 4/13 4/14 4/14 4/20 5/12 5/16 11/20 25/13 25/17</p> <p>speak [3] 22/17 31/23 39/13</p> <p>speaking [1] 23/6</p> <p>speaks [1] 41/22</p> <p>special [11] 7/13 26/22 31/2 32/6 42/13 48/13 48/22 52/14 52/20 53/4 53/9</p> <p>specific [9] 8/1 14/15 14/18 15/14 15/14 15/22 23/10 28/21 50/25</p> <p>specifically [3] 11/19 22/19 53/23</p> <p>specification [3] 17/20 18/1 31/14</p> <p>specifications [1] 27/9</p> <p>specificity [1] 23/3</p> <p>spend [6] 7/7 23/20 23/22 25/16 25/22 43/23</p> <p>spending [1] 24/23</p> <p>spent [1] 25/3</p> <p>spirit [1] 40/16</p> <p>spreadsheet [8] 34/17 38/18 38/21 38/24 39/6 39/17 39/22 39/22</p> <p>spreadsheet that [1] 39/6</p> <p>squabbles [1] 31/16</p> <p>Square [1] 1/11</p> <p>stages [1] 13/19</p> <p>stake [1] 23/13</p> <p>stalemate [2] 49/23 50/7</p> <p>stand [1] 12/22</p> <p>standing [1] 20/21</p> <p>standpoint [2] 21/7 27/3</p> <p>staring [1] 20/18</p> <p>start [4] 3/7 15/6 16/7</p>
---	---	---

S start... [1] 33/17 started [1] 35/13 starting [2] 5/7 20/6 statement [1] 31/12 STATES [3] 1/1 1/9 41/22 status [3] 1/8 3/3 33/2 stick [1] 54/8 still [14] 9/14 11/6 33/3 33/19 34/16 35/15 38/23 38/25 39/9 42/16 43/10 44/18 48/8 50/14 Stipes [4] 2/5 51/8 51/9 55/13 stop [8] 6/3 11/17 12/17 22/2 29/7 29/21 43/3 43/4 store [4] 10/19 10/19 11/13 41/23 stored [6] 8/10 11/14 13/9 13/23 14/3 53/24 story [1] 38/5 Street [3] 1/12 1/22 2/2 strong [1] 52/19 struggling [1] 36/2 stuck [1] 51/2 studies [24] 33/4 33/22 35/8 35/10 35/14 35/20 36/1 37/3 37/4 37/6 37/8 37/10 37/12 39/9 39/11 39/15 40/8 40/22 44/12 44/13 44/15 44/20 45/20 46/6 study [5] 35/21 36/9 39/7 39/20 39/21 stuff [14] 10/21 16/3 16/12 21/21 22/11 25/25 26/2 26/4 26/5 28/9 30/6 33/11 41/20 44/22 sub [2] 10/4 10/8 sub-universe [2] 10/4 10/8 submit [2] 4/17 22/9 submitted [1] 3/23 subset [1] 12/7 substantive [1] 51/21 such [1] 16/7 suggest [3] 5/11 46/18 53/11 suggested [1] 53/9 suggesting [2] 23/17 24/14 suggestion [2] 23/19 48/13 suit [1] 52/15 Suite [3] 1/12 1/18 2/2 summarize [1] 28/2 supplement [1] 7/15 suppose [2] 5/24 34/6 supposed [1] 30/11 sure [10] 10/14 13/10 16/8 16/9 22/1 27/7 31/2 33/17 33/18 48/16 surprising [1] 34/20 Susanne [3] 6/19 20/25 23/23 switch [1] 30/15 system [2] 14/16 19/3 systems [1] 11/7	tailor [1] 51/15 take [18] 3/20 4/12 6/17 6/19 12/3 12/22 22/13 29/23 30/5 36/11 39/8 43/25 44/1 47/24 49/7 49/8 49/12 53/6 taken [6] 8/25 11/5 20/24 20/25 40/15 50/18 taking [6] 10/21 24/8 34/1 34/24 39/10 53/14 talk [3] 18/20 20/1 24/17 talked [4] 6/6 6/7 8/7 26/17 talking [8] 6/9 13/14 18/16 25/3 31/24 44/12 44/16 44/17 targeted [1] 23/16 team [1] 34/15 teammates [1] 37/22 tee [6] 24/21 26/19 26/19 42/20 43/17 45/13 teed [1] 43/12 teeing [1] 45/25 tees [1] 44/23 tell [13] 4/6 6/22 16/22 20/23 33/1 42/20 42/23 49/21 49/21 52/11 52/14 54/11 54/14 telling [7] 10/3 19/11 25/21 28/22 29/21 30/17 45/5 tens [3] 4/14 5/15 7/8 terminated [1] 35/24 terms [11] 5/24 12/10 12/14 16/10 27/5 33/18 39/25 45/24 45/25 46/4 51/16 test [8] 18/8 18/9 18/10 18/12 18/13 31/14 32/2 46/15 testing [16] 4/11 5/6 5/17 6/6 8/6 9/1 9/6 14/1 17/4 17/24 25/15 27/23 31/12 31/13 31/18 31/25 text [1] 22/10 than [7] 8/3 9/23 31/6 33/22 40/23 46/17 49/1 thank [16] 4/8 26/14 31/23 32/13 32/20 32/22 32/23 38/13 44/6 47/25 48/5 54/16 54/17 54/20 55/4 55/6 that [417] that's [3] 24/9 38/5 53/16 the Sixer's [1] 34/16 their [14] 3/6 4/12 8/17 16/4 29/22 30/9 34/5 43/4 44/24 44/25 44/25 46/9 49/2 54/3 them [27] 4/3 7/5 7/6 8/12 8/17 10/7 11/17 11/19 11/24 12/13 12/17 16/14 17/3 20/8 22/3 22/8 25/7 29/14 29/21 30/10 32/11 32/17 35/12 38/22 41/24 44/21 50/22 themselves [4] 8/3 13/17 17/11 31/19 then [33] 5/9 6/16 7/3 7/15 11/21 11/24 13/2 14/23 18/19 19/15 20/9 21/5 27/16 27/22 32/8 32/10 32/17 33/12 35/22 36/10 36/24 41/17 43/1 43/21 44/3 47/22 50/3 50/3 51/2 51/22 52/10 53/25 54/12 theory [1] 54/13	there [65] Thereupon [1] 55/7 these [26] 3/25 7/4 10/18 11/11 11/13 11/20 12/10 12/13 13/8 14/11 19/5 24/10 28/16 29/20 32/15 34/13 35/7 35/10 35/17 35/23 35/24 37/11 39/21 40/6 42/3 46/6 they [100] they're [1] 22/19 thing [18] 6/9 6/23 12/15 12/19 27/5 31/21 32/14 34/23 35/4 36/6 36/18 36/24 37/9 39/12 41/25 48/21 49/19 51/6 things [21] 8/21 9/23 14/25 15/1 15/3 16/4 16/7 16/10 16/22 18/5 19/5 20/21 29/20 31/15 31/19 36/19 36/20 39/2 39/11 46/21 48/24 think [59] thinking [1] 48/3 Third [1] 1/15 thirds [6] 41/3 41/12 41/14 41/16 41/24 44/12 thirty [1] 47/15 this [96] Thomsen [4] 6/19 7/1 21/1 23/24 those [22] 8/10 8/11 8/12 9/2 11/6 11/10 11/18 15/2 16/12 16/14 23/14 27/24 28/11 34/9 35/3 36/3 37/4 39/11 40/5 44/14 44/15 52/9 though [2] 8/16 29/7 thought [2] 43/8 48/2 thousands [4] 4/14 5/15 7/8 7/8 three [4] 6/13 25/16 29/18 51/13 through [12] 1/8 7/4 18/3 25/17 31/16 40/6 42/12 43/1 43/2 46/3 48/12 52/9 throw [1] 34/12 Thursday [6] 6/19 6/25 21/1 22/11 23/23 47/13 tight [1] 49/11 time [24] 6/1 7/25 10/24 20/21 23/4 24/6 24/19 24/24 25/1 25/3 25/12 25/18 25/22 30/11 30/12 34/7 34/14 36/16 40/19 41/21 42/11 43/25 51/22 53/6 time-consuming [1] 36/16 timeframes [1] 28/14 times [6] 4/17 5/21 13/16 19/3 42/13 51/19 timing [2] 49/3 49/3 titles [1] 8/15 to do [1] 42/23 today [23] 6/22 12/22 12/25 13/1 13/1 21/21 24/3 24/9 26/25 29/8 30/25 31/24 34/8 34/15 38/18 41/1 41/10 42/1 43/13 47/2 51/20 52/16 54/18 today's [1] 38/22 together [4] 8/14 43/15 46/4 46/23 told [10] 7/13 11/16 11/19
T table [1] 20/1 tablets [1] 8/9 tabular [2] 8/25 17/12		

T told... [7] 12/17 16/16 21/17 25/5 32/11 41/10 45/16 tolerance [2] 17/20 18/6 tolerances [2] 18/5 18/8 tomorrow [10] 6/17 6/25 20/25 22/10 23/21 24/12 30/8 30/16 31/4 50/22 took [2] 6/14 40/21 top [1] 34/10 topic [1] 48/23 Torsten [2] 6/14 20/24 total [1] 6/1 tougher [1] 52/6 tracking [2] 34/22 34/23 TRACY [6] 1/10 3/9 5/22 25/14 40/20 51/9 transcript [2] 26/21 55/9 transcripts [1] 6/24 transfer [1] 7/4 translate [1] 11/20 transpired [1] 7/17 trial [4] 33/4 37/19 40/7 46/10 trials [12] 33/25 37/16 38/19 38/21 40/1 41/3 41/7 41/14 41/17 41/23 42/3 43/24 tried [1] 11/10 trip [1] 43/24 triple [1] 34/23 trouble [1] 29/10 true [3] 17/17 21/3 44/13 truly [1] 53/16 try [5] 8/2 41/13 41/17 41/20 46/23 trying [8] 3/24 9/24 19/8 24/24 29/9 37/1 43/15 46/4 turn [5] 4/6 7/15 32/24 33/15 35/22 two [23] 4/24 10/18 12/1 12/12 15/3 17/10 27/24 28/11 39/2 40/5 41/3 41/12 41/14 41/16 41/24 44/12 45/18 45/19 45/20 45/23 47/2 47/5 53/23 two-fold [1] 12/12 two-thirds [6] 41/3 41/12 41/14 41/16 41/24 44/12 TX [1] 1/19 type [3] 8/15 14/1 19/2 types [2] 27/24 31/18 typically [1] 46/9	22/25 24/13 understood [3] 4/5 26/7 53/4 undertook [1] 8/11 unduly [2] 21/20 22/18 unfold [1] 51/12 unilaterally [2] 11/22 12/16 Union [1] 41/22 UNITED [3] 1/1 1/9 41/22 units [1] 18/7 universe [2] 10/4 10/8 unnecessary [2] 31/16 31/22 unprint [1] 31/5 unsuccessful [1] 11/11 until [6] 9/16 19/9 20/15 23/19 40/18 46/8 untoward [1] 5/11 up [27] 3/20 6/23 17/20 20/24 24/21 26/19 26/19 26/21 31/6 34/12 35/12 36/22 37/22 37/23 38/15 39/22 42/20 43/12 43/17 44/23 45/6 45/8 45/13 45/25 46/8 49/12 53/1 up with [1] 26/21 update [1] 34/17 updated [2] 38/18 52/20 updates [1] 34/14 upload [1] 7/9 upon [3] 10/18 11/12 40/3 us [29] 7/9 10/23 11/20 12/1 12/14 12/17 14/9 20/10 20/12 20/12 21/24 24/12 27/1 27/20 29/13 35/15 39/3 40/5 42/18 46/11 49/21 49/21 51/15 52/6 52/7 54/3 54/7 54/11 54/14 usable [2] 10/22 27/20 use [2] 12/15 18/5 useable [2] 12/20 28/6 used [1] 17/7 usually [1] 47/5	was [49] 4/1 4/5 5/1 5/5 6/15 6/18 6/19 6/21 7/12 7/13 8/1 9/1 9/13 10/15 10/24 11/9 11/22 12/20 13/3 13/10 13/11 18/17 23/21 23/23 27/14 27/15 31/14 32/2 33/1 36/12 37/3 38/21 39/13 40/15 40/22 40/24 40/25 41/5 41/10 42/1 43/9 45/16 48/2 48/2 53/7 53/7 53/8 53/24 55/7 was about [1] 43/9 wasn't [4] 10/25 42/5 42/6 42/7 waste [3] 6/1 25/1 25/18 watch [1] 40/20 watching [1] 51/12 WATTS [35] 1/17 1/17 3/11 3/12 4/6 5/25 7/13 7/15 7/25 8/4 8/21 9/4 9/10 14/14 17/14 20/9 20/16 23/4 23/17 24/23 25/9 25/12 25/21 30/2 32/10 38/2 38/4 40/6 40/11 44/12 47/6 48/19 50/20 52/12 55/2 Watts' [1] 44/10 waving [1] 38/2 way [16] 4/23 7/2 10/23 14/8 14/22 15/15 19/23 22/22 26/19 35/14 39/21 43/17 45/10 45/13 49/5 53/11 ways [1] 15/15 we [275] we'll [1] 52/16 we're [2] 12/4 54/6 week [8] 7/1 26/23 37/18 38/14 40/3 45/6 45/8 55/5 weekend [3] 39/13 47/3 47/13 weeks [5] 12/2 36/7 45/23 47/2 47/5 Weiss [1] 1/11 Welcome [1] 32/24 well [11] 13/24 16/8 27/23 29/12 30/12 40/9 43/15 46/3 48/7 50/18 53/1 well-known [1] 13/24 went [4] 27/16 35/5 39/18 43/8 were [18] 3/4 3/23 7/5 8/16 10/16 11/18 20/23 29/6 31/18 35/11 35/20 37/3 39/5 39/10 41/3 42/7 53/3 53/23 WEST [3] 1/2 1/5 2/6 what [136] whatever [10] 3/21 18/3 18/6 21/9 24/21 25/22 25/23 31/20 47/6 50/6 whatsoever [2] 41/3 41/11 when [25] 6/5 6/6 18/15 21/17 27/8 28/15 30/15 31/25 32/1 32/2 33/9 35/19 36/1 36/8 36/24 37/11 39/21 40/22 44/20 49/7 52/22 52/24 53/6 53/14 53/21 where [30] 12/22 12/25 12/25 13/1 15/17 15/22 17/6 26/8 27/15 27/18 28/10 29/10 29/11 33/7 33/16 33/21 34/5
U ultimately [1] 45/5 unable [1] 51/17 unclear [1] 49/22 under [2] 5/19 33/11 underlying [7] 7/20 17/5 17/8 17/16 18/15 27/12 28/17 understand [28] 3/24 6/4 6/5 7/10 8/20 9/24 11/13 12/6 14/14 14/23 15/13 16/3 17/14 17/23 18/2 19/8 19/10 19/23 20/2 25/4 29/25 29/25 30/14 40/13 46/20 49/12 51/3 52/7 understanding [3] 14/10	V vacuum [1] 14/12 valor [1] 41/19 value [2] 19/18 31/15 values [1] 9/1 vendor [1] 8/13 Venn [1] 14/24 versions [1] 15/8 versus [3] 11/7 25/13 27/9 very [14] 13/10 14/15 28/15 29/21 32/5 32/6 32/20 40/24 41/9 43/7 43/22 47/22 49/11 53/16 view [1] 49/15 W wait [1] 23/19 waiver [1] 23/12 waiving [2] 23/9 30/21 wake [2] 45/6 45/8 want [61] want versus [1] 27/9 wanted [7] 7/16 13/10 27/1 33/7 49/19 53/6 53/18 wants [5] 13/3 17/15 29/15 38/5 48/10 warehouse [1] 41/24	

<p>W</p> <p>where... [13] 34/12 35/15 36/1 36/3 37/8 37/21 42/9 45/5 45/19 45/24 52/5 52/7 53/5</p> <p>wherever [1] 35/1</p> <p>whether [16] 4/3 4/10 18/9 18/13 18/17 19/4 19/18 21/19 31/5 33/1 37/3 45/2 49/3 49/9 49/14 53/8</p> <p>which [37] 5/5 7/7 7/9 7/21 8/24 9/1 9/6 9/9 10/7 10/9 10/9 11/2 13/3 14/15 14/25 15/3 16/5 16/5 16/15 16/15 16/19 16/20 17/15 18/4 19/13 22/8 24/24 34/3 34/25 37/9 39/14 39/23 39/25 40/14 40/21 43/3 54/9</p> <p>while [3] 34/16 45/25 46/10</p> <p>who [10] 5/1 5/10 6/15 6/18 6/19 33/2 40/4 41/10 41/16 49/22</p> <p>why [19] 11/12 12/6 19/23 24/18 26/9 27/12 29/19 29/25 31/12 40/7 40/8 41/3 41/5 42/3 46/6 52/8 52/10 53/12 53/16</p> <p>will [96]</p> <p>willing [6] 23/2 23/15 23/15 33/10 37/22 38/11</p> <p>wiped [2] 42/6 42/8</p> <p>wise [4] 21/11 21/13 21/14 21/17</p> <p>wish [1] 52/22</p> <p>within [3] 10/3 18/7 39/16</p> <p>without [3] 41/24 49/17 50/24</p> <p>witness [4] 37/18 41/1 41/2 41/10</p> <p>won't [2] 18/13 30/22</p> <p>Wood [3] 40/21 41/1 42/2</p> <p>word [2] 18/5 31/10</p> <p>words [4] 20/11 22/24 23/14 50/13</p> <p>work [9] 4/22 25/14 32/7 40/5 43/2 46/17 47/13 48/15 52/9</p> <p>working [8] 34/5 43/1 43/14 46/3 46/3 46/19 46/23 47/7</p> <p>working night [1] 47/7</p> <p>Works [1] 47/14</p> <p>world [4] 9/22 15/17 26/8 45/10</p> <p>would [52] 4/17 6/22 8/16 8/17 9/12 9/14 9/19 9/21 10/11 11/1 11/2 14/17 15/10 15/22 16/9 17/17 17/19 17/21 17/25 18/16 18/22 19/5 19/6 19/13 20/6 20/13 22/1 22/18 22/21 22/23 24/3 24/18 25/3 29/10 32/19 35/21 37/16 39/4 39/6 40/9 41/25 41/25 43/24 45/11 45/22 46/1 47/17 50/13 50/16 51/15 52/3 54/1</p> <p>would react [1] 22/1</p> <p>wouldn't [1] 18/22</p> <p>written [2] 31/19 47/24</p>	<p>wrong [2] 3/25 25/19</p> <hr/> <p>Y</p> <p>year [2] 12/1 44/17</p> <p>yes [6] 4/8 6/13 7/24 19/24 44/16 53/20</p> <p>yet [3] 19/4 34/11 37/24</p> <p>York [1] 1/15</p> <p>you [254]</p> <p>you I [1] 33/1</p> <p>you're [3] 20/18 22/13 48/19</p> <p>your [49] 3/15 3/21 4/7 7/24 8/7 8/23 12/4 12/23 13/6 13/7 13/7 13/16 14/2 16/24 19/22 22/24 23/8 23/11 25/1 25/22 26/15 26/16 28/23 29/16 31/11 32/23 33/17 38/13 38/19 39/17 43/7 44/7 45/22 46/11 47/2 47/4 47/12 47/17 48/16 50/18 51/6 51/19 52/13 54/12 54/20 54/22 54/25 55/2 55/6</p> <p>yourself [1] 52/24</p> <hr/> <p>Z</p> <p>ZANTAC [7] 1/4 3/2 13/20 15/16 34/3 39/10 40/23</p> <p>Zoom [2] 1/8 40/20</p>	
---	---	--