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April 25, 2016

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APR 25 2016

JOEL SCHNEIDER
U.S. Magistrate Judge

Honorable Joel Schneider
United States Magistrate Judge
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US Courthouse
1 John F. Gerry Plaza, Courtroom 3C
4th and Cooper Streets
Camden, NJ 08101

**Re: In re Benicar (Olmesartan) Products Liability Litigation
MDL No. 2606**

Dear Judge Schneider:

Pursuant to the Court's April 20, 2016 Order, we provide the following schedule of Daiichi Sankyo Co, Ltd. witnesses to be deposed in Hawaii beginning May 19, 2016, with the interpreters for each deposition. We ask that the schedule be court ordered without any further delay so that the witnesses may finalize travel plans. The parties have reached agreement on this schedule with the exception of two issues.

First, plaintiffs have stated for the first time this afternoon they do not agree to multiple interpreters for each deposition. It is standard practice to rotate interpreters during a deposition. The plaintiffs' lawyers in these depositions talk fast and the process is intense. Having the interpreters rotate will ensure optimum quality. Defendants are paying for the interpreters, and have assigned multiple interpreters so as to avoid fatigue. Defendants believe this is their decision to make. We do not see a legitimate basis for plaintiffs' new objection.

Second, plaintiffs requested three changes to the scheduling originally proposed

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Hon. Joel Schneider

April 25, 2016

Page 2

by defendants. Defendants accommodated two requests. We cannot accommodate the third, which was to move Hanako Saito's deposition from July 5-6 to July 7-8 or 15-16. July 7-8 is already taken with the Yoshihiro Emura deposition and Ms. Saito is not available on July 15-16. The sole reason given by plaintiffs for their proposed change is personal convenience. The change should be rejected.

WITNESSES	DEPOSITION DATES	ASSIGNED INTERPRETERS
Akiko Fukuma	May 19-20	Asami Isomichi and Naoko Selland
Makoto Mizuno	May 23-24	Asami Isomichi and Steve Silver
Donald Hinman	May 26	No interpreter needed
Yasushi Hasebe	May 31, June 1	Asami Isomichi and Steve Silver
Wataru Takasaki	June 2-3	Naoko Selland, Steve Silver and Hiromi Yoshikawa
Akinori Nishiwaki	June 6-7	Asami Isomichi and Hiromi Yoshikawa
Yasushi Yoshigae	June 8-9	Naoko Selland and Hiromi Yoshikawa
Kuniko Sata	June 11-12	Asami Isomichi and Naoko Selland
Shinichi Oda	June 14-15	Asami Isomichi, Naoko Selland and Noriko Hasegawa
Kento Wada	June 16-17	Asami Isomichi, Noriko Hasegawa and Naoko Selland
Katsuyoshi Chiba	June 20-21	Naoko Selland, Noriko Hasegawa and Asami Isomichi
Hisashi Nakagaki	June 22-23	Asami Isomichi, Naoko Selland and Noriko Hasegawa

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Hon. Joel Schneider
April 25, 2016
Page 3

WITNESSES	DEPOSITION DATES	ASSIGNED INTERPRETERS
Takahiko Kaku	June 24, June 27	Asami Isomichi, Noriko Hasegawa and Naoko Selland
Hironobu Saito	June 28-29	Naoko Selland, Noriko Hasegawa and Asami Isomichi
Yasufumi Kuroda	June 30-July 1	Asami Isomichi, Naoko Selland and Noriko Hasegawa
Hanako Saito	July 5-6	Asami Isomichi, Noriko Hasegawa and Naoko Selland
Yoshihiro Emura	July 7-8	Naoko Selland, Noriko Hasegawa and Asami Isomichi
Atsushi Sanbuissho	July 11-12	Naoko Selland, Noriko Hasegawa and Asami Isomichi
Yuko Komokata	July 13-14	Asami Isomichi and Naoko Selland
Hideki Tagawa	July 13-14	TBD

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

s/Susan M. Sharko

Susan M. Sharko

SMS/dlg

cc: Chris Coffin, Esq.
Adam Slater, Esq.
All Counsel of Record (via ECF)