

Law Offices

June 13, 2016

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VIA ECF & FEDERAL EXPRESS

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Honorable Robert Kugler
Honorable Joel Schneider
U.S. District Court - District of New Jersey
Mitchell S. Cohen Building & US Courthouse
1 John F. Gerry Plaza, Courtroom 5C
4th and Cooper Streets
Camden, NJ 08101

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**Re: In re Benicar (Olmesartan) Products Liability Litigation
MDL No. 2606
Sandra Madden Case No. 1:15-cv-3679**

Dear Judge Kugler and Judge Schneider:

Pursuant to the Court's June 1, 2016 Order, below is a schedule for the depositions of bellwether plaintiffs and their spouses or significant others for those nine cases where we are in agreement.

Bellwether Case	Deponent	Deposition Date	Agreed upon location
Harris, 15-cv-2978	Plaintiff Amelia Harris	July 19, 2016	San Luis Obispo County Regional Airport, Airport Conference Room #1, 903 Airport Drive, Suite 5, San Luis Obispo, CA
Lovelady, 15-cv-4573	Plaintiff, Shirley Lovelady	July 19, 2016	To be determined
	Plaintiff's spouse, Garry Lovelady	July 20, 2016	
Morgan, 15-cv-5165	Plaintiff, Patricia Morgan	July 12, 2016	To be determined
	Plaintiff's spouse, Mitchell Morgan	July 13, 2016	

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Bellwether Case	Deponent	Deposition Date	Agreed upon location
Phillips, 15-cv-2717	Plaintiff, Michelle Phillips	June 22, 2016	Slattery Petersen PLLC, 2828 North Central Ave., Suite 1111, Phoenix, Arizona 85004
Priest, 15-cv-4695	Plaintiff, Allen Priest	July 19, 2016	Robins Kaplan LLP, 800 LaSalle Avenue, Suite 2800, Minneapolis, MN 55402
	Plaintiff's significant other, Diane Reese	July 19, 2016, immediately following plaintiff's deposition	
Stapleton, 15-cv-5165	Plaintiff, Kathie Stapleton	June 24, 2016	Taylor Martino, P.C., 51 Saint Joseph Street, Mobile, AL 36602
	Plaintiff's spouse, Stanley Stapleton	June 24, 2016, immediately following plaintiff's deposition	
Stiles, 15-cv-4850	Plaintiff, Rexanne Stiles	June 29, 2016	To be determined
Sutton, 15-cv-4890	Plaintiff, Susan Sutton	July 14, 2016	At a location in Nashville, TN, to be determined
Williams, 15-cv-4504	Plaintiff, Lamar Williams	July 7, 2016	Robins Kaplan LLP, 800 LaSalle Avenue, Suite 2800, Minneapolis, MN 55402

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Bellwether Case	Deponent	Deposition Date	Agreed upon location
	Plaintiff's spouse, Lois Williams	July 8, 2016	

We have not agreed to deposition dates in the Norman Block (15-cv-3902) case. The issues regarding this case are set forth in the Joint Agenda for the June 13, 2016 conference to be addressed with the Court.

If this meets with the Court's approval, we respectfully request that the above schedule be entered in a Court Order. We appreciate the Court's attention to this matter.

Respectfully submitted,

s/ Susan M. Sharko
Susan M. Sharko

SMS/dd

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