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10 UNITED STATES DISTRICT COURT

11 SOUTHERN DISTRICT OF CALIFORNIA

12 IN RE INCRETIN-BASED THERAPIES
13 PRODUCTS LIABILITY LITIGATION

14 Case No. 3:13-md-02452-AJB-MDD

15 MDL 2452

16 Hon. Mitchell D. Dembin

17 *This Document Relates to All Cases*

18 **JOINT MOTION FOR ENTRY OF PROPOSED CASE MANAGEMENT**
19 **ORDERS REGARDING ESI DISCOVERY**

20 In this joint motion, defendant Eli Lilly and Company ("Lilly"), Amylin
21 Pharmaceuticals, LLC ("Amylin") and the Plaintiffs' Steering Committee ("PSC")
22 (collectively "Parties"), seek entry of Case Management Orders regarding the
23 production of Electronically Stored Information ("ESI") in this MDL. The Parties
24 have met and conferred, and reached agreement on protocols in the form of
25 proposed orders. Accordingly, Lilly, Amylin and the PSC jointly request that the
26 Court grant this joint motion and enter the proposed orders.
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Respectfully Submitted,

DATED: April 7, 2014

s/ Allan A. Thoen

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*Attorneys for Defendant
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DATED: April 7, 2014

s/ Amy J. Laurendeau

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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Jacob W. Plattenberger and Tor A. Hoerman, and that I have obtained their authorizations to affix their electronic signature to this document.

I further certify that the content of this document is acceptable to Allan A. Thoen, counsel for Defendant Eli Lilly and Company and that I have obtained his authorization to affix his electronic signature to this document.

DATED: April 7, 2014.

s/ Amy J. Laurendeau
Amy J. Laurendeau
Attorney for Defendant
Amylin Pharmaceuticals, LLC

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2014, I electronically filed the foregoing with the clerk of the court using the CM/ECF system which will send notification of such filing to the e-mail address denoted on the electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the following is true and correct.

Executed on April 7, 2014, at Newport Beach, California.

s/ Amy J. Laurendeau
Amy J. Laurendeau