

1 LOREN H. BROWN  
loren.brown@dlapiper.com  
2 HEIDI LEVINE  
heidi.levine@dlapiper.com  
3 DLA PIPER LLP (US)  
1251 Avenue of the Americas, 27th Floor  
4 New York, NY 10020-1104  
Tel: 212.335.4500  
5 Fax: 212.335.4501

6 CHRISTOPHER M. YOUNG (Bar No. 163319)  
christopher.young@dlapiper.com  
7 DLA PIPER LLP (US)  
401 B Street, Suite 1700  
8 San Diego, CA 92101  
Tel: 619.699.2700  
9 Fax: 619.699.2701

10 Attorneys for Defendant  
NOVO NORDISK INC.

11 **UNITED STATES DISTRICT COURT**  
12 **SOUTHERN DISTRICT OF CALIFORNIA**

14 IN RE INCRETIN-BASED  
15 THERAPIES PRODUCTS LIABILITY  
16 LITIGATION

17 *As to All Related and Member Cases*

Case No. 13-md-2452-AJB-MDD

**JOINT SUBMISSION OF  
AGENDA FOR THE JULY 1,  
2014 MDL CONFERENCE**

Judge: Hon. Anthony J. Battaglia  
Magistrate: Hon. Mitchell D. Dembin

1 The parties have conferred and agreed to the following agenda for the July 1,  
2 2014 Conference:

- 3 1. Status of document productions;
  - 4 a. Certification;
  - 5 b. Additional custodial files which may be requested by Plaintiffs;
  - 6 c. Date and scope of Lilly's production;
- 7 2. Discovery schedule for general causation and preemption;
- 8 3. Deposition protocol;
- 9 4. Privilege protocol and log format;
- 10 5. Sealing of documents / Protective Order;
- 11 6. Decedent estate order;
- 12 7. Coordination of thyroid cancer cases;
- 13 8. 45-day Rule and application in the MDL;
- 14 9. Logistics of discovery motions.

15  
16 Respectfully submitted:

17  
18 Dated: June 27, 2014

LOREN H. BROWN  
HEIDI LEVINE  
CHRISTOPHER M. YOUNG  
DLA PIPER LLP

19  
20  
21 By: /s/ Christopher M. Young

22 Attorneys for Defendant  
23 Novo Nordisk Inc.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: June 27, 2014

RYAN L. THOMPSON  
WATTS GUERRA LLP

By: /s/ Ryan L. Thompson

Plaintiffs' Counsel

Dated: June 27, 2014

HUNTER J. SHKOLNIK  
NAPOLI BERN RIPKA SHKOLNIK

By: /s/ Hunter J. Shkolnik

Plaintiffs' Counsel

Dated: June 27, 2014

MICHAEL K. JOHNSON  
JOHNSON BECKER PLLC

By: /s/ Michael K. Johnson

Plaintiffs' Counsel

Dated: June 27, 2014

TOR A. HOERMAN  
TORHOERMAN LAW LLC

By: /s/ Tor A. Hoerman

Plaintiffs' Counsel

Dated: June 27, 2014

GAYLE BLATT  
CASEY GERRY SCHENK  
FRANCAVILLA BLATT &  
PENFIELD, LLP

By: /s/ Gayle Blatt

Plaintiffs' Counsel

Dated: June 27, 2014

NINA M. GUSSACK  
PEPPER HAMILTON LLP

By: /s/ Nina M. Gussack

Attorneys for Defendant  
Eli Lilly and Company, a corporation

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: June 27, 2014

STEPHEN P. SWINTON  
LATHAM & WATKINS LLP

By: /s/ Stephen P. Swinton

Attorneys for Defendant  
Eli Lilly and Company, a corporation

Dated: June 27, 2014

RICHARD B. GOETZ  
O'MELVENY & MYERS LLP

By: /s/ Richard B. Goetz

Attorneys for Defendant  
Amylin Pharmaceuticals, LLC

Dated: June 27, 2014

DOUGLAS MARVIN  
WILLIAMS & CONNOLLY LLP

By: /s/ Douglas Marvin

Attorneys for Defendant  
Merck Sharp & Dohme Corp.

Dated: June 27, 2014

VICKIE E. TURNER  
WILSON TURNER KOSMO LLP

By: /s/ Vickie E. Turner

Attorneys for Defendant  
Merck Sharp & Dohme Corp.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SIGNATURE CERTIFICATION

Pursuant to Section 2.f.4 of the Court’s CM/ECF Administrative Policies, I hereby certify that authorization for the filing of this document has been obtained from each of the other signatories shown above and that all signatories have authorized placement of their electronic signature on this document.

/s/ Christopher M. Young  
Christopher M. Young