

1 **UNITED STATES DISTRICT COURT**  
2 **SOUTHERN DISTRICT OF CALIFORNIA**

3 **IN RE: INCRETIN-BASED**  
4 **THERAPIES PRODUCTS**  
5 **LIABILITY LITIGATION**

**Master File No.: 3:13-md-02452-AJB-MDD**  
**MDL – 2452**

6 **Relates to: ALL CASES**

**DECLARATION OF MICHAEL K.**  
**JOHNSON IN SUPPORT OF**  
**PLAINTIFFS’ MOTION TO**  
**RECONSIDER ORDER DENYING**  
**MOTION TO COMPEL DISCOVERY OF**  
**ADVERSE EVENT SOURCE**  
**DOCUMENTS AND DATABASES**

10  
11 I, Michael K. Johnson, declare and state:

12 1. I am a partner with the firm Johnson//Becker PLLC and an attorney, duly  
13 licensed to practice before the courts in the state of Minnesota, the United States Supreme  
14 Court, the United States Court of Appeals for the Eight Circuit, the United States District  
15 Court for the District of Minnesota, the United States District Court for the Eastern  
16 District of Wisconsin, and the United States District Court for the Western District of  
17 Wisconsin.

18 2. I am a member of Plaintiffs’ Executive Committee in MDL-2452 pursuant to  
19 the Court’s Order Appointing a Plaintiffs’ Steering Committee dated October 17, 2013.  
20 (Dkt. No. 147.) I am serving as the Plaintiffs’ Discovery Chair for this litigation.

21 3. Pursuant to CivLR 7.1(i)(1), Plaintiffs’ original application for relief was  
22 made to Judge Anthony Battaglia on August 12, 2014, wherein Plaintiffs sought  
23 production of Defendants’ Adverse Event Source Documents and Databases. (Dkt. No.  
24 554 and attachments).

25 4. Pursuant to CivLR 7.1(i)(1), Plaintiffs’ Motion was denied on October 6,  
26 2014. (Dkt. No. 705).

