

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Baltimore Division)**

IN RE: SMITH & NEPHEW
BIRMINGHAM HIP RESURFACING
(BHR) HIP IMPLANT PRODUCTS
LIABILITY LITIGATION

MDL No. 2775
Master Docket No. 1:17-md-2775

JUDGE CATHERINE C. BLAKE

**THIS DOCUMENT RELATES TO
ALL ACTIONS**

**PARTIES' PROPOSED AGENDA
FOR NOVEMBER 28, 2018 STATUS CONFERENCE**

Plaintiffs and Defendant Smith & Nephew, Inc. ("S&N") hereby submit a proposed agenda for the in-person status conference scheduled for November 28, 2018 in Courtroom 7D.

- I. In Chambers Meeting – Scheduled for 9:00 am EDT
- II. Open Court Status Conference – Scheduled for 9:30 am EDT
 - A. Status of MDL filings, and state court litigation
 - B. Status of discovery
 1. BHR Track
 2. THA Track
 3. Discovery Disputes
 - C. Federal and state court coordination
 - D. Application of statute of limitations Order to additional cases in BHR and THA Track; Timeline for submission of potential amended complaints
 - E. Next Status Conference Dates

Dated: November 26, 2018

Respectfully Submitted,

/s/ Robert K. Jenner (signed with permission)

Robert K. Jenner, Bar No. 04165
JENNER LAW
1829 Reisterstown Road, Suite 350
Baltimore, Maryland 21208
rjenner@jennerlawfirm.com
Phone: 410-413-2155
Facsimile: 410-982-0122

Jasper D. Ward IV
JONES WARD PLC
The Pointe
1205 E. Washington St., Suite 111
Louisville, Kentucky 40206
jasper@jonesward.com
Phone: (502) 882-6000
Facsimile: (502) 587-2007

Genevieve M. Zimmerman
MESHESHER & SPENCE LTD.
1616 Park Avenue South
Minneapolis, MN 55404
gzimmerman@meshesher.com
Phone: (612) 339-9121
Facsimile: (612) 339-9188

Counsel for Plaintiffs

/s/ Sara J. Gourley

Sara J. Gourley
Jana D. Wozniak
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, Illinois 60603
sgourley@sidley.com
jwozniak@sidley.com
Telephone: (312) 853-7000
Facsimile: (312) 853-7036

Paul J. Zidlicky
SIDLEY AUSTIN LLP
1501 K Street, N.W.
Washington, DC 20005
pzidlicky@sidley.com
Tel.: (202) 736-8000
Fax: (202) 736-8711

James B. Irwin
Kim E. Moore
David O'Quinn
IRWIN FRITCHIE URQUHART &
MOORE
400 Poydras St. #2700
New Orleans, Louisiana 70130
jirwin@irwinllc.com
kmoore@irwinllc.com
doquinn@irwinllc.com
Telephone: (504) 310-2100
Facsimile: (504) 310-2101

Terri S. Reiskin, Bar No. 05256
DYKEMA GOSSETT PLLC
1301 K Street NW, Suite 1100 West
Washington, DC 20005
treiskin@dykema.com
Telephone: (202) 906-8600
Fax: (855) 216-7884

*Counsel for Defendant Smith & Nephew,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of November 2018, I electronically filed the foregoing with the Court using the CM/ECF system and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Terri S. Reiskin

Counsel for Defendant Smith & Nephew, Inc.