

**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 DECEMBER 19, 2018 STATUS CONFERENCE**

Plaintiffs and Defendant Smith & Nephew, Inc. ("S&N") hereby submit a proposed agenda for the in-person status conference scheduled for December 19, 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
 - B. Status of discovery
 1. BHR Track
 2. THA Track
 - C. Status of Motion to Dismiss THA and R3 MACCs and Short Form Complaints
 - D. Status of Motion for Protective Order regarding Plaintiffs' Notice of 30(b)(6) Deposition regarding insurance topics
 - E. Plaintiffs' Motion to Compel regarding four documents on Smith & Nephew's privilege log
 - F. Plaintiffs' Motions for Relief from filing short form complaints in *Cox* and *Bohman*

G. January 30, 2019 Motion to Dismiss hearing and settlement conference regarding THA Track cases

Dated: December 17, 2018

Respectfully Submitted,

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

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*Counsel for Defendant Smith & Nephew,
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CERTIFICATE OF SERVICE

I, Sara J. Gourley, hereby certify that on this 17th day of December 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/ Sara J. Gourley

*Counsel for Defendant Smith & Nephew,
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