

**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
MARCH 5, 2020 STATUS CONFERENCE**

Plaintiffs and Defendant Smith & Nephew, Inc. ("S&N") hereby submit a proposed agenda for the in-person status conference scheduled for March 5, 2020 in Courtroom 7D.

- I. In Chambers Telephone Conference – Scheduled for 9:00 am ET
- II. Open Court Status Conference – Scheduled for 9:30 am ET
 - A. Status of MDL filings
 - B. Status of CMO 16: Pretrial Schedule for BHR & THA Track cases
 - C. Status of general discovery
 1. BHR Track
 2. THA Track
 - D. Status of case-specific discovery
 1. BHR Track
 2. THA Track
 - E. Hearing on Plaintiffs' Motion to Compel In Camera Review of Clawed Back Documents

Dated: March 2, 2020

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 2nd day of March 2020, 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, Inc.