

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

IN RE: LOESTRIN 24 FE ANTITRUST LITIGATION
All Actions
MDL No. 2472
C.A. No. 1:13-md-2472-S-PAS

ASSENTED TO MOTION TO MODIFY INTERIM CASE MANAGEMENT ORDER NO. 9 TO EXTEND DEADLINE TO MAY 18, 2018 FOR PLAINTIFFS TO FILE PRIVILEGE-RELATED MOTIONS TO COMPEL CONCERNING WARNER & WATSON

Pursuant to Federal Rule of Civil Procedure 16(b)(4), Direct Purchaser, End Payor, and Retailer Plaintiffs (collectively, "Plaintiffs") submit this motion, assented to by the Defendants, for an order modifying the Court's November 6, 2017 Interim Case Management Order No. 9 ("Case Management Order 9"), see ECF No. 349, solely to extend by four (4) weeks - from April 20, 2018 to May 18, 2018 - the deadline for Plaintiffs to file privilege-related motions concerning Defendants Warner and Watson. The extension will allow Plaintiffs adequate time to complete review of the Warner and Watson Defendants' privilege logs, and to meet and confer to narrow the issues. The extension will not impact any other deadlines set forth in Case Management Order 9.

Plaintiffs request this extension following a telephonic conference with the Warner and Watson Defendants and Magistrate Judge Sullivan on April 13, 2018. Plaintiffs and the Warner and Watson Defendants addressed with Magistrate Judge Sullivan Plaintiffs' request for additional time to review a recently produced, and an upcoming Warner and Watson privilege log. Of particular relevance to this Assented to Motion, the Warner and Watson Defendants served an updated privilege log on March 19, 2018, and have indicated that they will serve an

updated log on April 20, 2018. With the guidance of Magistrate Judge Sullivan, Plaintiffs and the Warner and Watson Defendants have agreed to the proposed deadline of May 18, 2018 for Plaintiffs to bring privilege-related motions to compel related to the Warner and Watson Defendants' privilege logs and production.

Accordingly, Plaintiffs propose extending the deadline to file privilege-related motions concerning the Warner and Watson Defendants' privilege logs and production by four (4) weeks. This proposal would move the deadline for Plaintiffs to May 18, 2018.

Below is the proposed case management amendment to be added to Case Management Order 9, as requested herein:

<b>Event</b>	<b>Current Schedule</b>	<b>Assented to Proposal</b>
Deadline for Plaintiffs to file motions regarding privilege-related issues concerning Warner and Watson Defendants' privilege logs and production. <sup>1</sup>	April 20, 2018	May 18, 2018

WHEREFORE, Plaintiffs respectfully request that the Court grant this Assented to Motion and enter a new interim case management order extending by four (4) weeks, to May 18, 2018, the deadline for Plaintiffs to file motions regarding privilege-related issues concerning the

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<sup>1</sup> Discovery motions may be filed before this date, but may only be filed after this date to address issues arising after the deadline or for good cause shown.

Warner and Watson Defendants' privilege logs and production.

Dated: April 18, 2018

Respectfully submitted,

/s/ Sharon K. Robertson

Sharon K. Robertson

Donna M. Evans

COHEN MILSTEIN SELLERS  
& TOLL PLLC

88 Pine Street, 14th Floor

New York, NY 10005

(212) 838-7797

srobertson@cohenmilstein.com

devans@cohenmilstein.com

Marvin A. Miller

Lori A. Fanning

MILLER LAW LLC

115 South LaSalle Street, Suite 2910

Chicago, IL 60603

(312) 332-3400

MMiller@millerlawllc.com

LFanning@millerlawllc.com

Steve D. Shadowen

Matthew C. Weiner

HILLIARD & SHADOWEN LLP

219 Congress Ave.

Suite 1325

Austin, TX 78701

(855) 344-3298

steve@hilliardshadowenlaw.com

matt@hilliardshadowenlaw.com

Michael M. Buchman

Michelle C. Zolnoski

MOTLEY RICE LLC

600 Third Avenue, Suite 2101

New York, NY 10016

(212) 577-0050

mbuchman@motleyrice.com

mzolnoski@motleyrice.com

Robert J. McConnell  
MOTLEY RICE LLC  
321 South Main Street, 2nd Floor  
Providence, RI 02903  
(401) 457-7700  
bmconnell@motleyrice.com

*Interim Co-Lead Counsel for End Payor Plaintiffs*

David Sorensen  
Zachary D. Caplan  
BERGER & MONTAGUE, P.C.  
1622 Locust Street  
Philadelphia, PA 19103  
(215) 875-3000  
dsorensen@bm.net  
zcaplan@bm.net

Daniel Walker  
BERGER & MONTAGUE, P.C.  
2001 Pennsylvania Ave., N.W., Suite 300  
Washington, D.C. 20006  
(202) 559-9745  
dwalker@bm.net

Thomas M. Sobol (R.I Bar No. 5005)  
Kristen Johnson  
Kiersten Taylor  
HAGENS BERMAN SOBOL  
SHAPIRO LLP  
55 Cambridge Parkway, Suite 301  
Cambridge, MA 02142  
(617) 482-3700  
tom@hbsslaw.com  
kristenj@hbsslaw.com  
kierstent@hbsslaw.com

Joseph H. Meltzer  
Terence S. Ziegler  
KESSLER TOPAZ MELTZER &  
CHECK LLP  
280 King of Prussia Road  
Radnor, PA 19087  
(610) 667-7706  
jmetlzer@ktmc.com  
tziegler@ktmc.com

Peter R. Kohn  
Neill W. Clark  
FARUQI & FARUQI LLP  
101 Greenwood Ave., Suite 600  
Jenkintown, PA 19046  
(215) 277-5770  
pkohn@faruqilaw.com  
nclark@faruqilaw.com

*Interim Co-Lead Counsel for Direct  
Purchaser Class Plaintiffs*

Patrick C. Lynch (R. I. Bar. No. 4867)  
Jeffrey B. Pine (R.I. Bar No. 2538)  
Maria F. Deaton (R.I. Bar No. 7286)  
LYNCH AND PINE  
One Park Row, 5th Floor  
Providence, RI 02903  
(401) 274-3306  
patrick@patricklynchgroup.com  
jbp@pinelaw.com  
mdeaton@lynchpine.com

*Liaison Counsel for Direct Purchaser  
Class Plaintiffs*

Scott E. Perwin  
Lauren C. Ravkind  
Anna T. Neill  
KENNY NACHWALTER P.A.  
Four Seasons Tower  
1441 Brickell Avenue, Suite 1100  
Miami, FL 33131  
(305) 373-1000  
sperwin@knpa.com  
lravkind@knpa.com

Paul J. Skiermont  
Sarah E. Spires  
SKIERMONT DERBY LLP  
2200 Ross Avenue, Suite 4800W  
Dallas, TX 75201  
(214) 978-6600  
pskiermont@skiermontderby.com

*Counsel for Walgreen Co., The Kroger Co.,  
Safeway Inc., Albertson's LLC and HEB  
Grocery Company L.P.*

Barry L. Refsin  
Eric L. Bloom  
HANGLEY ARONCHICK SEGAL PUDLIN &  
SCHILLER  
One Logan Square, 27th Floor Philadelphia, PA  
19103  
(215) 496-7031  
brefsin@hangle.com  
ebloom@hangle.com

*Counsel for CVS Pharmacy, Inc., Rite Aid Corp.  
and Rite Aid Hdqtrs. Corp.*

S. Michael Levin  
55 Dorrance Street, Suite 200  
Providence, RI 02903  
Tel.: (401) 228-6339  
Fax: (866) 652-0274

*Local Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of April, 2018, the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). The foregoing document is also available for viewing and downloading from the ECF system.

/s/ Sharon K. Robertson