

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

IN RE: LOESTRIN 24 FE ANTITRUST LITIGATION  <i>All Actions</i>	) ) ) ) ) )	MDL No. 2472  C.A. No. 1:13-md-2472-S-PAS
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**UNOPPOSED MOTION TO MODIFY  
INTERIM CASE MANAGEMENT ORDER NO. 10 TO EXTEND DEADLINE TO MAY  
25, 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 for an order modifying the Court’s April 19, 2018 Interim Case Management Order No. 10 (“Case Management Order 10”), *see* ECF No. 388, solely to extend by one week – from May 18, 2018 to May 25, 2018 – the deadline for Plaintiffs to file privilege-related motions concerning Defendants Warner and Watson. The extension will allow the parties adequate time to complete production of information and review of information, and meet and confer to narrow the issues. The extension will not impact any other deadlines set forth in Case Management Order 10. The Warner and Watson Defendants do not oppose this motion. Defendant Lupin also does not oppose this motion.

Plaintiffs and the Warner and Watson Defendants reported to the Court on May 9, 2018 and May 14, 2018 that they are continuing to work to complete the exchange of information necessary to narrow or resolve their privilege log issues, but do not believe the substantive issues are ripe for the Court’s guidance. They also reported that they anticipate needing more time

during the week of May 21 to resolve and narrow issues, including seeking the Court’s guidance, if all issues are not resolved.

Accordingly, Plaintiffs propose extending the deadline to file privilege-related motions concerning the Warner and Watson Defendants’ privilege logs and production by one week. This proposal would move the deadline for Plaintiffs to May 25, 2018. Plaintiffs have conferred with the Warner and Watson Defendants, and with the Lupin Defendants, who do not oppose this motion.

Below is the proposed case management amendment to be added to Case Management Order 10, as requested herein:

Event	Current Schedule	Joint Proposal
Deadline for Plaintiffs to file motions regarding privilege-related issues concerning Warner and Watson Defendants’ privilege logs and production. <sup>1</sup>	May 18, 2018	May 25, 2018

WHEREFORE, Plaintiffs respectfully request that the Court grant this motion and enter a new interim case management order extending by one week, to May 25, 2018, the deadline for Plaintiffs to file privilege-related motions concerning the Warner and Watson Defendants’ privilege logs and production.

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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.

Dated: May 16, 2018

Respectfully submitted,

/s/ Sharon K. Robertson

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of May, 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