UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

)	MDL No. 2472
)	C.A. No. 1:13-md-2472-S-PAS
)	
))))

UNOPPOSED MOTION TO MODIFY INTERIM CASE MANAGEMENT ORDER NO. 11 TO EXTEND DEADLINE TO JUNE 1, 2018 FOR PLAINTIFFS TO FILE PRIVILEGE-RELATED MOTIONS TO COMPEL CONCERNING WARNER & WATSON

Pursuant to Federal Rule of Civil Procedure 16(b)(4), and following a conference with Judge Sullivan on May 24, 2018, the Direct Purchaser, End-Payor, and Retailer Plaintiffs (collectively, "Plaintiffs") submit this motion for an order modifying the Court's May 23, 2018 Interim Case Management Order No. 11 ("Case Management Order 11"), to extend by four business days – from May 25, 2018 to June 1, 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 11 nor materially delay the resolution of the issues raised in Plaintiffs' privilege-related motions. The Warner and Watson Defendants do not oppose this motion. The Lupin Defendants also do not oppose this motion.

Plaintiffs and the Warner and Watson Defendants updated the Court on May 24, 2018 regarding their exchange of information necessary to narrow or resolve their privilege log issues, including seeking the Court's guidance. In light of the parties' May 24, 2018 conference with the Court, Plaintiffs propose extending the deadline to file privilege-related motions concerning the

Warner and Watson Defendants' privilege logs and production by four business days from the current deadline (Monday, May 28, 2018 is a holiday). This proposal would move the deadline for Plaintiffs to June 1, 2018. Plaintiffs have conferred with the Warner and Watson Defendants, who do not oppose this motion.

Below is the proposed case management amendment to be added to Case Management Order 11, as requested herein:

Event	Current Schedule	Unopposed Proposal
Deadline for Plaintiffs to file motions regarding privilege-related issues concerning Warner and Watson Defendants' privilege logs and production. ¹	May 25, 2018	June 1, 2018

WHEREFORE, Plaintiffs respectfully request that the Court grant this motion and enter a new interim case management order extending the deadline to June 1, 2018 for Plaintiffs to file privilege-related motions concerning the Warner and Watson Defendants' privilege logs and production.

Dated: May 25, 2018

Respectfully submitted,

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¹ 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.

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CERTIFICATE OF SERVICE

I hereby certify that on this 25th 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 Sharon K. Robertson