

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI

IN RE NUVARING® PRODUCTS ) 4:08 MDL 1964 RWS  
LIABILITY LITIGATION )  
) ALL CASES  
)  
)  
) Honorable Rodney W. Sippel

**FERRER, POIROT & WANSBOUGH'S MOTION FOR ACCOUNTING OF  
PLAINTIFFS' STEERING COMMITTEE COMMON BENEFIT FEES**

Ferrer, Poirot & Wansbrough (FPW) hereby adopts by reference and incorporates herein, the same as if fully set forth, FERRER, POIROT & WANSBROUGH'S OBJECTIONS TO SPECIAL MASTER'S RECOMMENDATION FOR COMMON BENEFIT ATTORNEY'S FEE, Document 1734, and respectfully moves the Court to Order an accounting of all PSC fee submissions and recommendations by the Special Master. It is believed that Kristine Kraft and the Special Master are the only ones that possess the information that forms the basis of the Special Master's common benefit attorney's fee recommendations. In order for the process to have complete transparency and legitimacy, an accounting of all fee submissions, by all PSC members, any notes, emails or correspondence between the Special Master and Kristine Kraft's firm, and any formulas used, or calculations made, to determine any fee recommendations, should be provided to FPW and all other PSC members. Good cause exists for the granting of this Motion.

WHEREFORE, FPW prays that the Court order the Special Master and Kristine Kraft's law firm to produce an accounting as requested herein. FPW prays for such other appropriate relief.

Respectfully submitted,

FERRER, POIROT & WANSBROUGH

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I certify that, pursuant to the Federal Rules of Civil Procedure, served on all counsel of record via electronic means by the clerk, via United States mail, confirmed receipt delivery on this 3<sup>rd</sup> day of September 2014.

/s/John T. Kirtley, III  
John T. Kirtley, III