

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 & WANSBROUGH'S MOTION TO ABATE OR ENJOIN  
DISTRIBUTION OF COMMON BENEFIT FEES TO ANY PSC MEMBER**

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 Abate or Enjoin any distribution, to any PSC member, of any common benefit attorney's fees until such objections can be ruled upon. FPW will likely suffer irreparable harm if such common benefit monies are diminished or depleted. Good cause exists for granting this Motion.

WHEREFORE, FPW prays that the Court grant this Motion as requested herein and for such other appropriate relief.

Respectfully submitted,

FERRER, POIROT & WANSBROUGH

/s/John T. Kirtley, III  
JOHN T. KIRTLEY, III  
Missouri Bar No. 60568  
2603 Oak Lawn Ave., Suite 300  
P.O. Box 199109  
Dallas, Texas 75219  
(214) 521-4412  
(214) 526-6026 Fax  
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