

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

**IN RE NUVARING® PRODUCTS
LIABILITY LITIGATION**

4:08-MD-1964-RWS

Honorable Rodney W. Sippel

ALL CASES

**DOCUMENT ELECTRONICALLY
FILED**

**JOINT STATUS REPORT FILED BY DEFENDANTS AND BY PLAINTIFFS
REPRESENTED BY ALONSO KRANGLE LLP**

Defendants and Plaintiffs represented by the Alonso Krangle firm submit the following Joint Status Report regarding the status of the NuvaRing® product liability litigation.

- 1 On December 30, 2015, Defendants made a production of regulatory file documents related to the FDA's 2013 label change concerning the thromboembolism warnings in the NuvaRing® product labeling. Plaintiffs have had an opportunity to review those documents and did not request any further written discovery by Defendants within the deadline to make such requests.
- 2 The Alonso Krangle Plaintiffs intend to take certain depositions of Defendants' witnesses on the following general discovery topics: a regulatory witness concerning the 2013 label change and further deposition(s) to be discussed by the parties. The Alonso Krangle Plaintiffs, other Plaintiffs' counsel, and Defendants will meet and confer regarding the timing and scope of these depositions.

- 3 Currently, there are 14 cases filed by Alonso Krangle Plaintiffs that are in, or soon to be transferred to, this MDL. Alonso Krangle intends to file a total of approximately 130 or more NuvaRing® cases. Additionally, there are seven cases in the MDL that were filed by Plaintiffs represented by other firms.

- 4 Defendants and the Alonso Krangle Plaintiffs request that the parties be given additional time to complete the above depositions of Defendants' witnesses, in order to complete general fact discovery, and that a further Case Management Conference be set in late June 2016.

DATED: February 26, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of February, 2016, I filed the foregoing via the Court's electronic case filing system, which will cause it to be served on the counsel of record.

/s/ Melissa A. Geist