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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: FOSAMAX PRODUCTS LIABILITY LITIGATION

MDL NO. 1789 1:06-md-1789 (JFK)

This Document Relates to:

ALL ACTIONS

DECLARATION OF WILLIAM J. BEAUSOLEIL

WILLIAM J. BEAUSOLEIL declares as follows:

1. I am an attorney admitted to practice before this Court and a partner at

Hughes Hubbard & Reed LLP, attorneys for Defendant Merck Sharp and Dohme, Corp.,

formerly known as Merck & Co., Inc. ("Merck"). I am familiar with the facts set forth herein. I make this declaration based on my own personal knowledge and the business records of the

Firm.

2. I make this declaration in support of Merck's Memorandum in Support of its Motion for a Federal Rules of Civil Procedure 16 and 26 Case Management Order.

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3. A true and correct copy of Merck's proposed Case Management Order is attached hereto as Exhibit 1.

4. A true and correct copy of a chart listing the cases to which this order would apply is attached hereto as Exhibit 2.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ WILLIAM J. BEAUSOLEIL

DATED: New York, New York August 15, 2014