

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

<b>IN RE: BIOMET M2a MAGNUM HIP IMPLANT PRODUCT LIABILITY LITIGATION</b>  <b>(MDL 2391)</b>	)	<b>CAUSE NO. 3:12-MD-2391-RLM-CAN</b>
	)	
	)	<b>Judge Robert L. Miller, Jr.</b>
	)	
	)	<b>This Document Relates to:</b>
	)	
	)	<b>Civil Action No. 3:14-cv-70-RLM Civil Action No. 3:14-cv-157-RLM</b>

**MOTION TO STAY PROCEEDINGS PENDING REVISION SURGERY**

Pursuant to the parties' Joint Stipulation to Stay Proceedings Pending Revision Surgery (Doc. No. 1313) and this Court's February 15, 2014 Order (Doc. No. 1316), Defendants Biomet, Inc., Biomet Orthopedics, LLC, Biomet U.S. Reconstruction, LLC, and Biomet Manufacturing Corp. (collectively, "Biomet") move the Court to stay the above-captioned cases pending revision surgery.

In accordance with the Joint Stipulation, Defendants notified Plaintiffs' counsel of record by email that Defendants had identified these cases as non-revisions on February 10, 2014. Counsel for Plaintiffs in both actions responded and confirmed that neither Plaintiff has undergone revision surgery.

WHEREFORE, Biomet respectfully requests that the Court GRANT this motion and STAY the above-captioned cases pending revision surgery, including any and all case specific orders and deadlines and Plaintiff and Defendant Fact Sheets.

Dated: February 11, 2014

/s/ Erin Linder Hanig

---

John D. LaDue  
Erin Linder Hanig  
LADUE CURRAN & KUEHN LLC  
200 First Bank Building  
205 West Jefferson Boulevard  
South Bend, IN 46601  
Tel: (574) 968-0760  
jladue@lck-law.com  
ehanig@lck-law.com

John D. Winter  
Jenya Moshkovich  
PATTERSON BELKNAP WEBB & TYLER LLP  
1133 Avenue of the Americas  
New York, New York 10036  
Tel: (212) 336-2000  
jwinter@pbwt.com  
jmoshkovich@pbwt.com

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I certify that on February 11, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which provided electronic service upon all counsel of record.

/s/ Erin Linder Hanig

---

Erin Linder Hanig (29113-71)