

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION**

_____	)	CAUSE NO. 3:12-md-02391-RLM-CAN
In re BIOMET M2A MANGUM HIP	)	(MDL-2391)
IMPLANT PRODUCTS LIABILITY	)	-----
LITIGATION	)	THIS DOCUMENT RELATES TO:
_____	)	ALL CASES

**JOINT STIPULATION TO STAY RESPONSIVE PLEADINGS DEADLINES**

In light of the parties' Settlement Agreement and the February 3, 2014 Order vacating the Court's previous scheduling order (Doc. No. 1317), Plaintiffs and Defendants Biomet, Inc., Biomet Orthopedics, LLC, Biomet U.S. Reconstruction, LLC and Biomet Manufacturing, LLC (herein after collectively referred to as "Defendants") by and through their respective Co-Lead counsel, hereby jointly stipulate to a stay of all case specific responsive pleadings deadlines, including the filing of answers, until such time as the parties agree that the obligations contemplated by the Settlement Agreement have been completed.

WHEREFORE, the parties hereby respectfully request that the Court stay all responsive pleadings deadlines in all individual member cases.

DATED: February 12, 2014

Respectfully submitted,

/s/ Erin Linder Hanig \_\_\_\_\_

John D. Winter

**PATTERSON, BELKNAP, WEBB & TYLER, LLP**

1133 Avenue of the Americas

New York, NY 10036

(212) 336-2000

[jwinter@pbwt.com](mailto:jwinter@pbwt.com)

John D. LaDue

Erin Linder Hanig

**LADUE CURRAN & KUEHN LLC**

205 West Jefferson Boulevard

South Bend, IN 46601

(574) 968-0760

[jladue@lck-law.com](mailto:jladue@lck-law.com)

[ehanig@lck-law.com](mailto:ehanig@lck-law.com)

Attorney for Defendants

DATED: February 12, 2014

/s/ Thomas R. Anapol (by agreement) \_\_\_\_\_

Thomas R. Anapol

**ANAPOL SCHWARTZ**

1710 Spruce Street

Philadelphia, PA 19103

(215) 735-1130

[tanapol@anapolschwartz.com](mailto:tanapol@anapolschwartz.com)

W. Mark Lanier

**LANIER LAW FIRM, PC**

6810 FM 1960 West

Houston, Texas 77069

(713) 659-5200

[wml@lanierlawfirm.com](mailto:wml@lanierlawfirm.com)

Co-Lead Counsel for Plaintiffs

**CERTIFICATE OF SERVICE**

I certify that on February 12, 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)