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June 28, 2018

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VIA ECF AND FEDERAL EXPRESS

Hon. Susan D. Wigenton
United States District Court
District of New Jersey
Martin Luther King Building and U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

RE: Zimmer Durom Hip Cup Products Liability Litigation
MDL No. 2158 2:09-cv-04414 (DFW)(SCM)

Dear Judge Wigenton:

This firm, in addition to Carella, Byne, Cecchi, Agnello & Brody, P.C. and Seeger Weiss, was appointed by this Court to serve as Plaintiffs' Co-Liaison Counsel in 2011. Since that time, I have worked in that role. For that reason, Lieff Cabraser submitted a time and expense Petition, which Your Honor initially granted on June 7, 2018.

We have read the letter submissions from Jim Cecchi and Chris Seeger as well as the petition filed by Waters & Krause. There is no objection to Lieff Cabraser's time and expenses raised by any counsel. The only objection raised by Messrs. Cecchi and Seeger goes to Waters & Krause's time and expense submission based on the cases they tried for their own clients as bellwether cases.

PTO 3 contemplates a system of division of time but no one has forwarded their time. I was serving as the gatekeeper for common benefit time and expenses, but have not received anywhere near the claimed time.

All liaison counsel have not had an opportunity to discuss the common benefit time and expenses and we have not reached out to other firms who may consider that they, too, have common benefit time and expenses.

We agree with co-liaison that there should be a process in place to evaluate the time and expenses and submit them to the Court for approval. We respectfully request that Messrs. Cecchi, Seeger and I have an opportunity to do so and to present the time and expenses to the Court for review and approval. We would also like to notify all counsel that if

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they too have what they believe to be common benefit time that they have an opportunity to submit it for review.

We greatly appreciate the Court's attention to this matter.

Respectfully,



Wendy R. Fleishman

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