

# **Exhibit 4**

**Avandia MDL:  
Pleadings, Other Court Filings, and  
Significant Rulings in 2011**

<b>Date</b>	<b>Description</b>
3/9/2011	Order Granting Plaintiff's Motion to Compel Depositions of Winselow Tucker, Kristen Connors, Rita Stevens, James Carr, Colleen Bennett, Beth Peck, and David Pernock; corporate rep with knowledge re AVMDL00260408 "Net Sales Upside" document; Letendre depo denied as moot, and Freed/Lammers depositions reserved
3/30/2011	PSC's Response to GSK's Omnibus Motion for Summary Judgment regarding CHF (filed under seal)
6/6/2011	PSC's Motion Appealing the Special Master's 17 <sup>th</sup> R&R re Day Two Depositions of Freed and Lammers
6/14/2011	PSC's Amicus Brief in Opposition to GSK's Motion to Dismiss Certain Complaints re SOL
6/21/2011	Hearing on GSK's Omnibus Motion for Summary Judgment re CHF
6/30/2011	PSC's Reply in Further Support of Motion Appealing Special Master's 17 <sup>th</sup> R&R re Day Two Depositions for Certain Witnesses
7/12/2011	PSC's Opposition to GSK's Renewed Motion to Dismiss Plaintiffs' Complaints for Failure to State a Claim
8/3/2011	PSC's Response in Opposition to GSK's Motion for "Lone Pine II" Case Management Order
8/8/2011	Hearing re Lone Pine II and MTD re SOL
9/7/2011	Memorandum Opinion and Order Denying GSK's Motion to Dismiss re SOL
9/7/2011	Memorandum Opinion and Order Denying GSK's Motion for Summary Judgment re CHF
9/13/2011	PSC's Response in Opposition to GSK's Supplemental Memorandum and Proposed Order in Response to the Court's

	Inquiry re Alternative Lone Pine II Procedures
10/6/2011	Joint Motion and Order for the Appointment of Special Master Juneau pursuant to FRCP 53
10/11/2011	PSC's Response in Opposition to GSK's Motion for Reconsideration of the Court's 9/7/2011 Opinion re CHF
10/12/2011	PSC's Response in Opposition to GSK's Motion for Partial Reconsideration of the Court's Denial of GSK's Motion to Dismiss under the PA SOL
10/14/2011	Memorandum Opinion Denying GSK's Motion for Partial Reconsideration of Motion to Dismiss under PA SOL
9/29/2011	Plaintiff's Response to GSK's Motion for Summary Judgment
9/29/2011	Plaintiff's Response to Defendant Carmen Hoss's Motion for Summary Judgment
10/3/2011	Plaintiff's Motion to Consolidate Bellwether Trials
10/18/2011	Plaintiff's Reply in further support of Motion to Consolidate Bellwether Trials
10/18/2011	Plaintiff's Response to GSK's Motion for Summary Judgment on Janet Johnson's Claims
10/18/2011	Parisian Declaration in Support of Plaintiffs' Summary Judgment Responses
10/18/2011	Parisian Declaration in Support of Plaintiffs' Summary Judgment Responses (Insulin-specific)
10/18/2011	Brinton Declaration in Support of Plaintiffs' Summary Judgment Responses
10/18/2011	Jewell Declaration in Support of Plaintiffs' Summary Judgment Responses
10/18/2011	Griffin Declaration in Support of Plaintiff's MSJ Responses
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Avandia's Claimed Effect on HDL, LDL, ApoB or Lp-PLA 2, and Regarding the Experimental Drug Darapladib
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence Relating to Injuries Not Sustained by Plaintiff

10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of "Untitled Letters" and Warning Letters Received From the FDA's Division of Drug Marketing, Advertising and Communications
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of, or Reference to, Congressional Committee Staff Reports and Related Materials
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Reference to, and Evidence of, Adverse Event Reports
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude References to, and Evidence of, GSK's Conduct after October 5, 2006
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude References to, and Evidence of, Media Reports and Related Evidence
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude References to, and Evidence of, Regulatory Developments after October 5, 2006
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Hearsay Statements of Individual FDA Employees
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude References to, and Evidence of, Foreign Regulatory Action
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence Relating to Other Claims, Litigation and Investigations
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence Alleging that GSK Was "Misleading" or "Deceptive" in Its Dealings with the FDA
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude References to, and Evidence of, GSK's Alleged "Intimidation" and "Harassment" of Physicians Having No Connection to Plaintiff's Claims
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Unapproved Products, Proposed Indications, and Labeling Revisions Never Incorporated Into the Final Avandia Labeling
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of GSK's Profits, Net Worth, and Other Financial Information

10/21/2011	Plaintiff's Response to GSK's MIL to Exclude the Testimony of Plaintiff's Expert Witness Laura M. Plunkett , Ph.D.
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude the Testimony of Plaintiff's Case-Specific Causation Expert Barry S. Levy, MD
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude the Testimony of Plaintiff's Expert Witness Suzanne Parisian, MD
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude the Testimony of Plaintiff's Expert Witness Peter Rost, MD
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of or References to "Ghostwriting"
10/21/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Marketing and Promotional Materials Not Identified as Having Been Seen by Ralph Garcia's Prescribing Physicians
10/21/2011	Plaintiff's Response to GSK's Mo to Bifurcate Trial of Punitive Liability and Damages
10/21/2011	Garcia v. GSK Exhibit List
10/25/2011	Order Denying PSC's Appeal of 17 <sup>th</sup> R&R re Day Two Depositions of Freed and Lammers
10/31/2011	PSC's Response and Opposition to GSK's Motion to Exclude Testimony of Plunkett (filed under seal)
11/1/2011	Hearing on MSJs
11/3/2011	PSC's Sur-Reply in Opposition to GSK's Motion for Reconsideration of the Court's Denial of GSK's Motion for Summary Judgment on the Adequacy of the Avandia CHF Warning
11/7/2011	Plaintiffs and PSC's Rule 56(d) Motion and in the Alternative for an Extension of Time
11/8/2011	Plaintiffs and PSC's Emergency Motion for Expedited Hearing on Plaintiffs' Rule 56(d) Motion or in the Alternative for Extension of Time
11/17/2011	PSC's Response to GSK's Motion to Strike New Affidavits of PSC's Expert Witnesses Laura Plunkett and Guy Rordorf or in the Alternative to Depose these Witnesses on their

	Affidavits
12/1/2011	PSC's Reply in Support of Plaintiffs' Rule 56(d) Motion and in the Alternative Motion for Extension of Time
12/2/2011	Plaintiff's Deposition Designations for Johnson Trial
12/6/2011	Plaintiff's Trial Exhibit List
12/16/2011	PSC's Response to GSK's Motion for Summary Judgment on the Statute of Limitations
12/16/2011	Plaintiff's Objections and Counter Depositions Designations for Johnson Trial
12/21/2011	Plaintiff's Joint Statement
12/21/2011	Plaintiff's Jury Instructions
12/22/2011	Plaintiff's MIL re Second Hand Smoke
12/22/2011	Plaintiff's MIL re Cumulative Experts
12/22/2011	Plaintiff's MIL re HRT
	Plaintiff's Witness List
12/30/2011	PSC'S Response in Opposition to the Renewed Motion of GSK to Show Cause as to Why the Court Should Not Limit Plaintiffs' Attorneys' Fees
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence or Argument that GSK Had a Duty to Warn Plaintiff Directly
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence or Argument that GSK Had an Independent Duty to Conduct Additional Testing of Avandia or that Liability Can Be Based on any Alleged Failure to Conduct Additional Testing
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Media Reports and Related Evidence
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Congressional Committee Staff Reports and Related Matter
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence Related to Other Lawsuits, Claims and Investigations
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of

	Adverse Event Reports
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence Relating to Injuries Not Sustained by Plaintiff
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Marketing and Promotional Materials Not Identified as Having Been Seen by Plaintiff's Prescribing Physicians
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of "Ghostwriting" and of GSK's Publication Policies
12/30/2011	Plaintiff's Response to GSK's MIL to Preclude Plaintiff's Treating Physicians from Testifying on any New Opinions not Previously Disclosed
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Unapproved Products, Proposed Indications, and Labeling Revisions Never Incorporated Into the Final Avandia Labeling
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of GSK's Conduct after March 24, 2006
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Regulatory Developments after March 24, 2006
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Foreign Regulatory Action
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of "Untitled Letters" and Warning Letters Received From the FDA's Division of Drug Marketing, Advertising and Communications
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Hearsay Statements of Individual FDA Employees
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence that GSK Was "Misleading" or "Deceptive" in Its Dealings with the FDA
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of Avandia's Claimed Effect on HDL, LDL, ApoB or Lp-PLA 2, and Regarding the Experimental Drug Darapladib
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Expert

	Testimony on Intent, Motives or Ethics
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence or Argument Suggesting that GSK Had a Financial Motive to Downplay Avandia's Alleged Risks
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of GSK's Alleged "Harassment" and/or "Intimidation" of Physicians Who Have No Connection to Plaintiff's Claims
12/30/2011	Plaintiff's Response to GSK's MIL to Preclude the Testimony of Dr. Steven Nissen
12/30/2011	Plaintiff's Response to GSK's MIL to Preclude the Testimony of Rosemary Johann-Liang
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Voir Dire Questions Regarding Actual or Potential Damages
12/30/2011	Plaintiff's Response to GSK's MIL to Exclude Evidence of GSK's Profits, Net Worth, and Other Financial Information and Motion to Bifurcate Trial of Punitive Liability and Damages and Request to Preclude Admission of Profits or Financial Condition Pursuant to Civil Code § 3295(D)
12/30/2011	Plaintiff's Response to GSK's Frye Motion to Preclude Expert Testimony of Eliot A. Brinton, M.D.
12/30/2011	Plaintiff's Response to GSK's Frye Motion to Preclude Expert Testimony of Bruce Charash, M.D.
12/30/2011	Plaintiff's Response to GSK's Frye Motion to Preclude Expert Testimony of Dr. Suzanne Parisian