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October 21, 2015

By ECF and by Email to Chambers

Honorable Cathy Seibel United States District Judge Southern District of New York Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse 300 Quarropas Street White Plains, NY 10601-4150

> Re: In re Mirena IUD Products Liability Litigation, No. 13-MD-2434 (CS) (LMS)

Dear Judge Seibel:

Yesterday, the Court entered an Order (ECF No. 2670) in connection with Plaintiffs' application to file Fed. R. Evid. 702/*Daubert* motion papers under seal (ECF No. 2669).

Unfortunately, I was misinformed as to certain of the experts that will be the subject of Plaintiffs' forthcoming applications. Plaintiffs do not intend to file a motion to exclude as to Dr. Marcia C. Javitt, but do intend to file motions as to two additional experts, Drs. Michelle Collins, and Maureen T.F. Reitman. Accordingly, we respectfully request that the Court amend its Order. A proposed Order is submitted herewith.

We thank the Court for its consideration of this request and apologize for the inconvenience.

Respectfully,

Diogenes P. Kekatos Plaintiffs' Liaison Counsel

New York Newark Philadelphia

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Enclosure

cc: **By Email and by ECF (w/ encl)**

Shayna S. Cook, Esq. James Shepherd, Esq. William P. Harrington, Esq. Matthew J. McCauley, Esq. James R. Ronca, Esq. Fred Thompson III, Esq.