

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

In re: NEURONTIN MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION
THIS DOCUMENT RELATES TO:  ALL ACTIONS

MDL Docket No. 1629

Master File No. 04-10981

Judge Patti B. Saris  
Mag. Judge Leo T. Sorokin

**CLASS PLAINTIFFS' STIPULATION AND NOTICE OF PARTIAL WITHDRAWAL  
OF MOTION FOR ENTRY OF CASE MANAGEMENT ORDER ESTABLISHING  
COMMON BENEFIT ACCOUNT WITH RESPECT TO  
PLAINTIFF BLUE CROSS BLUE SHIELD OF ALABAMA**

Class Plaintiffs hereby withdraw their Motion for Entry of Case Management Order Supervising Settlement Discussion and Establishing Common Benefit Account (ECF No. 4211) in so far as that motion applied to former MDL plaintiff Blue Cross and Blue Shield of Alabama. Class Plaintiffs no longer seek to have a percentage of any recovery to Blue Cross and Blue Shield of Alabama held back for purposes of a common benefit assessment.

At this time, Class Plaintiffs' *do not* withdraw their motion as to any other third party payor ("TPP") with a case pending in this Neurontin MDL court, any unnamed class members within the proposed class definition set forth in the pending motion for class certification, or any other TPP or consumer with whom Defendant purports to settle a Neurontin sales and marketing claim.

Plaintiffs' Liaison Counsel and the Plaintiffs' Steering Committee hereby stipulate, on behalf of Class Plaintiffs, that any entity potentially affected by the proposed case management

order may have until September 23, 2014 to respond to the motion.

Dated: July 10, 2014

Respectfully submitted,

By:

/s/ Thomas M. Sobol

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***Members of the Class Plaintiffs'  
Steering Committee***

**CERTIFICATE OF SERVICE**

I, Thomas M. Sobol, hereby certify that I caused a copy of the above Class Plaintiffs' Stipulation and Notice of Partial Withdrawal of Motion for Entry of Case Management Order Establishing Common Benefit Account with Respect to Plaintiff Blue Cross Blue Sheild of Alabama to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: July 10, 2014

/s/ Thomas M. Sobol  
Thomas M. Sobol