

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS**

IN RE: PRADAXA  
(DABIGATRAN ETEXILATE)  
PRODUCTS LIABILITY LITIGATION

---

3:12-MD-02385-DRH-SCW

MDL No. 2385

This Document Relates to:

ALL CASES

**Agreed Motion for Entry of  
Implementation Order**

ON THE DATE ENTERED BELOW, the Plaintiffs, by and through the undersigned counsel, and the Defendants, file this their Agreed Motion for Entry of Implementation Order.

In support thereof, the parties would respectfully show the Court as follows:

1. The parties have negotiated and executed a Pradaxa Product Liability Master Settlement Agreement.
2. In support thereof, the parties jointly move this Court to enter the Implementation Order, attached hereto as Exhibit "A."

Respectfully submitted,

**PLAINTIFFS' STEERING COMMITTEE**

By: /s/ Mark R. Niemeyer  
Mark R. Niemeyer  
ONDER, SHELTON, O'LEARY &  
PETERSON, LLC  
110 E. Lockwood, 2nd Floor  
St. Louis, MO 63119  
314-963-9000  
[niemeyer@onderlaw.com](mailto:niemeyer@onderlaw.com)

Steven D. Davis  
TOR HOERMAN LAW, LLC  
101 W. Vandalia St., Suite 350  
Edwardsville, IL 62025  
618-656-4401  
[sdavis@torhoermanlaw.com](mailto:sdavis@torhoermanlaw.com)

**PLAINTIFFS' CO-LIAISON COUNSEL**

Roger C. Denton  
SCHLICHTER, BOGARD & DENTON, LLP  
100 S. Fourth St., Suite 900  
St. Louis, MO 63102  
314-621-6115  
[rdenton@uselaws.com](mailto:rdenton@uselaws.com)

Tor Hoerman  
TOR HOERMAN LAW, LLC  
101 W. Vandalia St., Suite 350  
Edwardsville, IL 62025  
618-656-4401  
[thoerman@torhoermanlaw.com](mailto:thoerman@torhoermanlaw.com)

Seth A. Katz  
BURG SIMPSON ELDREDGE HERSH  
JARDINE, P.C.  
40 Inverness Drive East  
Englewood, CO 80112  
303-792-5595  
[skatz@burgsimpson.com](mailto:skatz@burgsimpson.com)

Michael London  
DOUGLAS & LONDON  
111 John Street, Suite 1400  
New York, NY 10038  
212-566-7500  
[mlondon@douglasandlondon.com](mailto:mlondon@douglasandlondon.com)

Mikal C. Watts  
WATTS GUERRA CRAFT, LLP  
Four Dominion Drive, Bldg. 3  
Suite 100  
San Antonio, TX 78257  
210-447-0500  
[mwatts@wgclawfirm.com](mailto:mwatts@wgclawfirm.com)

**PLAINTIFFS' CO-LEAD COUNSEL**

Respectfully submitted,  
*/s/ Paul W. Schmidt*  
Paul W. Schmidt (DC #472486)  
COVINGTON & BURLING LLP  
1201 Pennsylvania Avenue NW  
Washington, D.C. 20004  
Phone: (202) 662-6000  
Fax: (202) 662-6291  
[pschmidt@cov.com](mailto:pschmidt@cov.com)

Michael X. Imbroscio (DC #445474)  
COVINGTON & BURLING LLP  
1201 Pennsylvania Avenue NW  
Washington, D.C. 20004  
Phone: (202) 662-6000  
Fax: (202) 662-6291  
[mimbroscio@cov.com](mailto:mimbroscio@cov.com)

Orlando R. Richmond, Sr. (MS #9885)  
BUTLER, SNOW, O'MARA, STEVENS &  
CANNADA, PLLC  
1020 Highland Colony Parkway, Suite 1400  
Ridgeland, MS 39157  
Phone: (601) 948-5711  
Fax: (601) 985-4500  
[orlando.richmond@butlersnow.com](mailto:orlando.richmond@butlersnow.com)

CANNADA, PLLC

Eric E. Hudson (TN #022851)  
BUTLER, SNOW, O'MARA, STEVENS &

6075 Poplar Avenue, Suite 500  
Memphis, TN 38119  
Phone: (901) 680-7200  
Fax: (901) 680-7201  
[eric.hudson@butlersnow.com](mailto:eric.hudson@butlersnow.com)

Dan H. Ball (#6192613)  
BRYAN CAVE LLP  
211 North Broadway, Suite 3600  
St. Louis, MO 63102-2750  
Phone: (314) 259-2000  
Fax: (314) 259-2020  
[dhball@bryancave.com](mailto:dhball@bryancave.com)

*Attorneys for Defendant Boehringer Ingelheim  
Pharmaceuticals, Inc.*

Beth Rose (NJ #028491987)  
SILLS CUMMIS & GROSS P.C.  
One Riverfront Plaza  
Newark, New Jersey 07102  
Phone: (973) 643-5877  
[brose@sillscummis.com](mailto:brose@sillscummis.com)

*Attorney for Defendant Boehringer Ingelheim  
International GmbH*

**CERTIFICATE OF SERVICE**

Pursuant to Local Rule 5.1 and Case Management Order No. 1, Paragraph 5, I hereby certify on May 28, 2014, a copy of the foregoing document was filed through the Court's ECF system. Notice of this filing will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Mark Niemeyer  
Mark Niemeyer

/s/ Paul W. Schmidt  
Paul W. Schmidt