



Law offices in:
ALABAMA
ARKANSAS
KENTUCKY

Hare, Wynn, Newell & Newton, LLP
2025 Third Avenue N., Suite 800
Birmingham, Alabama 35203
t: 205-328-5330
f: 205-324-2165

March 21, 2016

Via ECF

The Honorable Susan D. Wigenton
U.S. District Court, District of NJ
Martin Luther King, Jr. Federal Bldg. & US Courthouse
50 Walnut Street Newark, NJ 07102

RE: Civil Action No. 2:09-cv-04414-DFW-SCM; *In Re: Zimmer Durom Hip Cup Products Liability Litigation*; MDL-2158

Dear Judge Wigenton:

I am counsel of record representing the following Plaintiffs in the above-referenced matter:

Frances Charping; Case No. 2:14-cv-05516-SDW-SCM
Morris Reynolds; Case No. 2:12-cv-06173
John Hanicak; Case No. 2:16-cv-00375-SDW-SCM
Tyce McPherson; Case No. 2:16-cv-00339-SDW-SCM
Willie Glover-Unfiled

Pursuant to your Order dated March 14, 2016 [Doc. 844], the above-referenced plaintiffs object to the Case Management Order Regarding Settlement Agreement sent to the Court by Zimmer's counsel, Andrew Campbell [Doc 843]. As we have no cases pending in any state courts, we do not take any position with regard to the letter to state court judges.

The above-referenced Plaintiffs specifically join and adopt the arguments set forth in the letter brief submitted by Plaintiffs' co-liaison counsel, Waters & Kraus, on March 21, 2016 [Doc 853]. On the basis of the arguments set forth in the letter brief of Waters & Kraus, we also request the Court not enter the Proposed Case Management Order Regarding Settlement Agreement.

If the Court enters the Proposed Case Management Order Regarding Settlement Agreement over the objections, these Plaintiffs also join with Waters & Kraus' request a formal hearing before the Court on this important matter.

Thank you for your consideration to this matter.

Respectfully submitted,

/s/Don McKenna

Don McKenna
Hare, Wynn, Newell and Newton, LLP
DPM/lr

