

**Lieff
Cabrer
Heimann &
Bernstein**
Attorneys at Law

Lieff Cabrer Heimann & Bernstein, LLP
250 Hudson Street, 8th Floor
New York, NY 10013-1413
t 212.355.9500
f 212.355.9592

March 21, 2016

Wendy R. Fleishman
Partner
wfleishman@lchb.com

VIA ECF

The Honorable Susan D. Wigenton
United States District Judge
U.S. District Court for the District of New Jersey
Martin Luther King, Jr. Federal Building &
U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

RE: *In re: Zimmer Durom Hip Cup Products Liability Litigation*,
MDL No. 2158

Dear Judge Wigenton:

I am writing in my role as Plaintiffs' Co-Liaison counsel with regard to Your Honor's Text Order 844 dated March 14, 2016, setting the Monday, March 21, 2016, deadline for commentary on the Defendants' Proposed Case Management Order Regarding the Settlement Agreement ("Proposed CMO") and Defendants' Proposed Letter for Your Honor to Address State Court Judges ("Proposed State Court Letter") attached to the correspondence sent to the Court by Andrew Campbell, counsel for Zimmer, on March 11, 2016 [Doc. 843].

As the Court is aware, there are many Plaintiffs and Plaintiffs' counsel who will be impacted by the Proposed CMO and the Proposed State Court Letter. As a result, there has been a great amount of discussion among the counsel representing Plaintiffs. Due to the large number of responses to coordinate, Plaintiffs' Co-Liaison Counsel respectfully requests that Plaintiffs have a two-week extension (until April 4, 2016) to provide their responses, or in the alternative, permit formal briefing and a hearing so that Plaintiffs' counsel may be heard on these issues.

We greatly appreciate the Court's attention to this matter and patience with the litigation.

Respectfully,



Wendy R. Fleishman

WRF/wp
1298076.1

cc: All counsel