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March 21, 2016

Via: ECF

Honorable Susan Wigenton
U.S. District Court, District of New Jersey
Martin Luther King Jr. Building & US Courthouse
50 Walnut St.
Newark, NJ 07102

Re: In Re Zimmer Durom Hip Cup Products Liability Litigation
Civil Action Number: 2:09-cv-04414-SDW-SCM

Dear Judge Wigenton,:

Fleming Nolen & Jez, LLP represents the following 2 clients in this litigation:

Mary Jerumbo (No. 2:13-cv-05522-SDW-MCA)
Eric B. Rogne (No. 2:14-cv-01093).

We respectfully submit this objection to the Proposed CMO, Proposed Letter to State Court Judges, and Proposed Settlement agreement. We incorporate the objections articulated by other counsel. In fact, one of the cases listed above has already rejected a settlement offer similar to the amount offered in this Proposed Settlement Agreement.

We believe that the mandatory participation of all represented individuals, mandatory stay, and 90% individual firm acceptance rate create ethical dilemmas for counsel and seek orders that exceed the authority of the Court. We respectfully request the Court reject the proposals or hold oral argument as to counsel's objections.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'G. Sean Jez', is written over a printed name 'G. Sean Jez'.

GSJ:btp