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L A W O F F I C E S

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March 21, 2016

VIA ECF

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

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

Dear Judge Wigenton:

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

Douglas and Noreen Davis v. Zimmer, Inc., et al., 2:11-cv-07189-SDW-MCA
JoAnn Lange v. Zimmer, Inc., et al., 2:13-cv-04879-SDW-MCA

Pursuant to your Order of March 14, 2016 [Doc. 844], these Plaintiffs hereby object to the Case Management Order Regarding Settlement Agreement and Proposed Letter to State Court Judges attached to the correspondence sent to the Court by Andrew Campbell, counsel for Zimmer, on March 11, 2016 [Doc. 843]. Specifically, above-referenced Plaintiffs join and adopt the arguments set forth in the letter brief submitted by Plaintiffs' co-liaison counsel, Waters & Kraus, on March 21, 2016. On the basis of those arguments, we ask that the Court: (1) **not** enter the Proposed Case Management Order Regarding Settlement Agreement; and (2) **not** circulate the Proposed Letter to State Court Judges.

Additionally, if the Court is inclined to enter the Proposed Letter to State Court Judges over these objections, these Plaintiff(s) hereby join in Waters & Kraus's request for a formal hearing in front of the Court on these important matters.

Thank you in advance for your consideration.

Respectfully,

HEPWORTH, JANIS & KLUKSDAL

By J. Charles Hepworth
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