

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: C.R. BARD, INC., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL 2187

THIS DOCUMENT RELATES TO BARD WAVE 4 CASES

**PRETRIAL ORDER # 236
(Docket Control Order – Wave 4 Cases)**

At my request, the parties recently submitted a joint list of the remaining cases in the Bard MDL, MDL 2187, with claims against C. R. Bard, Inc. (“Bard”) and other defendants where counsel has at least 20 cases in the Bard MDL. The list included nearly 3,000 cases. I have chosen a total of 333 cases from that list, all of which name only C. R. Bard, Inc. These cases, attached hereto as Exhibit A, will be known as the “Bard Wave 4 cases,” and it is **ORDERED** as follows:

A. SCHEDULING DEADLINES. The following deadlines shall apply in the Bard Wave 4 cases:

Plaintiff Fact Sheets.	02/27/2017
Defendant Fact Sheets ¹ .	03/27/2017
Deadline for written discovery requests.	05/29/2017
Expert disclosure by plaintiffs.	05/12/2017
Expert disclosure by defendants.	06/12/2017
Expert disclosure for rebuttal purposes.	06/27/2017
Deposition deadline and close of discovery including corporate discovery	07/11/2017
Filing of Dispositive Motions.	07/31/2017
Response to Dispositive Motions.	08/14/2017
Reply to response to dispositive motions.	08/21/2017

¹ The parties will in good faith attempt to agree on whether to make any changes to the Defendant Fact Sheet format and if a schedule for further supplementation is necessary that supports and is consistent with the remainder of the schedule herein.

Filing of <i>Daubert</i> motions.	08/08/2017
Responses to <i>Daubert</i> motions.	08/22/2017
Reply to response to <i>Daubert</i> motions.	08/29/2017

1. **Discovery Completion Date.** The last date to complete depositions shall be the “discovery completion date” by which all discovery, including disclosures required by Federal Rule of Civil Procedure 26(a)(1), and (2), but not disclosures required by Federal Rule of Civil Procedure 26(a)(3), shall be completed.

2. **Limitations on Interrogatories, Requests for Admissions and Depositions.** The following limitations apply:

- a. Bard is limited to 10 interrogatories and 10 requests for admission per plaintiff.
- b. Plaintiffs are limited to 10 interrogatories and 10 requests for admission to Bard.
- c. In each individual member case, no more than 4 treating physicians may be deposed.²
- d. Depositions of plaintiff’s friends and family members may be taken at any time prior to trial provided the deposition is requested before the discovery completion date.
- e. Depositions of any witness are limited to 3 hours absent agreement of the parties.
- f. The court will consider modifications to the above limitations upon good cause shown.

3. **Limitations on Experts.** The following limitations related to experts apply:

² To the extent disputes arise regarding the division of time between the parties for the deposition of treating physicians (three hours total absent agreement), I will address those disputes, rather than the assigned Magistrate Judge, Judge Eifert.

- a. The parties may conduct general and specific expert discovery on the products at issue in Bard Wave 4 cases. However, because the parties have conducted substantial general expert discovery in the bellwether cases and waves prior to this wave, they are cautioned not to engage in duplicative general expert discovery. Instead, the parties should tailor their discovery to the products at issue in the Bard Wave 4 cases (to the extent such discovery is necessary), supplementing any discovery already completed and conducting specific causation discovery for the Bard Wave 4 plaintiffs. In light of the products involved in the Bard Wave 4 cases, the likelihood of overlap in expert opinion from one case to another (except as to specific causation) and the need to streamline discovery in these cases, **each side is limited to no more than five (5) experts per case (exclusive of treating physicians)**. It is the court's expectation that these experts will overlap for plaintiffs who have the same product(s), to some extent, if not entirely.
- b. The parties shall coordinate the depositions of general causation experts. Insofar as multiple plaintiffs utilize the same general causation expert or experts, those experts shall be deposed only once on the issue of general causation. As to Bard's experts, plaintiffs are instructed to choose a lead questioner.
- c. The court encourages the coordination of depositions of specific causation experts to the extent there is overlap in the parties' use of specific causation experts for multiple plaintiffs.

- d. The court will consider modifications to the above limitations upon good cause shown.

B. MOTION PRACTICE.

1. **Daubert Motions.** For the filing of *Daubert* motions on general causation issues only, the parties are instructed to file one *Daubert* motion per expert in the main MDL (MDL 2187) instead of the individual member case. Each side may file one response and one reply in the main MDL to each *Daubert* motion. This limitation does not apply to specific causation *Daubert* motions, responses and replies. Specific causation *Daubert* motions, responses and replies must be filed in the individual member cases. To the extent an expert is both a general and specific causation expert, the parties may file a general causation motion in the main MDL 2187 and an individual specific causation motion in an individual member case.

2. **Hearings.** Hearing dates for dispositive and *Daubert* motions, if any, will be set at a future status conference.

3. **Page Limitations.** The page limitations provided in Local Rule of Civil Procedure 7.1(a)(2) apply to memoranda in support of all dispositive and *Daubert* motions, oppositions, and replies, and the court will not be inclined to grant motions to exceed the page limit.

4. **Confidential Documents.** In the past, the court has permitted parties to file placeholder exhibits in support of *Daubert*, dispositive and other motions, responses and replies in the place of confidential documents that may be sealed and then, within five days, redact/dedesignate the documents or file a motion to seal. *Moving forward, the court will no longer permit this practice. Parties may no longer file placeholder exhibits.* The court expects leadership counsel for plaintiffs and the Ethicon defendants to resolve issues related to confidential

designations well before the filing of motions. Filings containing placeholder exhibits will be struck. In the event there are issues related to sealing of confidential documents that the parties are unable to resolve, they must be brought to the court's attention in a consolidated manner as follows: A consolidated motion to seal is due on or before **June 15, 2017**, any response is due **June 29, 2017** and any reply is due **July 6, 2017**.

5. **Locations of Filings.** With the exception of the general causation *Daubert* motions as outlined above, the parties are reminded that they must file dispositive and *Daubert* motions on specific causation, responses and replies in the applicable member cases only, not in the Bard MDL.

C. CASES READY FOR TRANSFER, REMAND OR TRIAL

1. **Venue Recommendations.** By no later than **May 12, 2017**, the parties shall meet and confer concerning the appropriate venue for each of the cases, and the parties shall file joint venue recommendations in MDL 2187 **May 22, 2017**. The parties' joint recommendation(s) shall identify the cases about which the recommended venue is in dispute. The court may then request briefing concerning the venue for those cases about which the parties disagree. Each party reserves the right to object to the venue selected by its adversary or the court.

2. **Transfer and Remand.** At the conclusion of pre-trial proceedings, the court, pursuant to PTO # 51 and 28 U.S.C. § 1404(a), will transfer each directly-filed case to a federal district court of proper venue as defined in 28 U.S.C. § 1391. In the alternative, pursuant to PTO # 15 and 28 U.S.C. § 1407, cases that were transferred to this court by the MDL panel shall

be remanded for further proceedings to the federal district court from which each such case was initially transferred.³

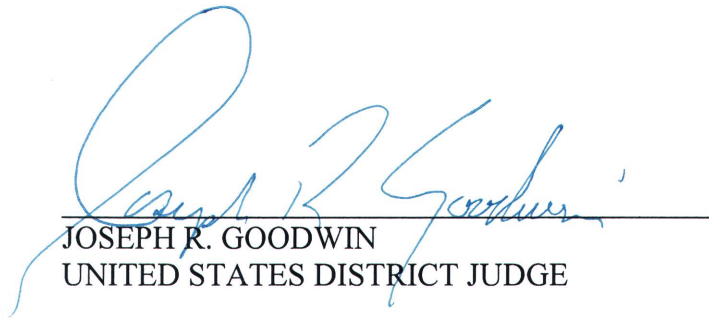
3. **Trial Settings.** If a case is to be tried in the United States District Court for the Southern District of West Virginia (either by agreement of the parties or where venue in the Southern District is determined to be proper by the court), the case shall be deemed trial-ready when discovery is completed and the court rules on the parties' pretrial motions. The trial date for cases transferred or remanded to other federal district courts shall be set by the judge to whom the transferred or remanded case is assigned (including the undersigned through intercircuit assignment).

D. COMMON BENEFIT TIME. I have entered a number of Pretrial Orders related to the eventual recovery of the cost of special services performed and expenses incurred by participating counsel in this and the other MDLs assigned to me. While I have not yet expressed an opinion regarding whether payment of common benefit fees is appropriate, nor will I here, I direct the parties' attention to PTO # 54, and its warning that "[n]o time spent on developing or processing purely individual issues in any case for an individual client (claimant) will be considered or should be submitted, nor will time spent on any unauthorized work." Pretrial Order No. 54, ECF No. 365, ¶ C. The nature of this litigation persuades me that I should inform counsel that at this point in the litigation, where most if not all of the general causation discovery has been completed, it is difficult to envision that any work performed by counsel on individual wave cases would rise to the level of common benefit work.

³ As expressly contemplated by PTO # 51, Bard does not waive its right to seek transfer—pursuant to 28 U.S.C. § 1406(a) or any other available ground—of any case to a court of proper venue, regardless of whether that case was transferred to or directly-filed in the Southern District of West Virginia.

The court **DIRECTS** the Clerk to file a copy of this order in 2:10-md-2187 and in the Bard Wave 4 cases identified in Exhibit A. In cases subsequently filed in this district after 2:17-cv-00184, a copy of the most recent pretrial order will be provided by the Clerk to counsel appearing in each new action at the time of filing of the complaint. In cases subsequently removed or transferred to this court, a copy of the most recent pretrial order will be provided by the Clerk to counsel appearing in each new action upon removal or transfer. It shall be the responsibility of the parties to review and abide by all pretrial orders previously entered by the court. The orders may be accessed through the CM/ECF system or the court's website at www.wvsd.uscourts.gov.

ENTER: January 27, 2017



JOSEPH R. GOODWIN
UNITED STATES DISTRICT JUDGE

EXHIBIT A**Wave 4 cases**

#	CASE STYLE	CASE NUMBER
1	Athans, Deborah et al. v. C.R. Bard, Inc.	2:13-cv-23388
2	Baker, Sharon et al. v. C.R. Bard, Inc.	2:13-cv-23391
3	DeGarmo, Tonia et al. v. C.R. Bard, Inc.	2:13-cv-23835
4	Clothier, Patricia et al. v. C.R. Bard, Inc.	2:13-cv-25041
5	Davidson, Octavia et al. v. C.R. Bard, Inc.	2:13-cv-26000
6	Dunklebarger, Shanna v. C.R. Bard, Inc.	2:13-cv-26011
7	Moize, Teresa v. C.R. Bard, Inc.	2:13-cv-26100
8	Beiber, Michelle et al. v. C.R. Bard, Inc.	2:13-cv-26522
9	Miller, Susan et al. v. C.R. Bard, Inc.	2:13-cv-29220
10	Robbins, Joan et al. v. C.R. Bard, Inc.	2:13-cv-29823
11	Howard, Shannon v. C.R. Bard, Inc.	2:13-cv-31242
12	Utter, Veronica et al. v. C.R. Bard, Inc.	2:13-cv-32049
13	Thomasson, Myrtle v. C.R. Bard, Inc.	2:13-cv-32187
14	Wilson, Wanda et al. v. C.R. Bard, Inc.	2:13-cv-32972
15	Schreiber-Hester, Beverly et al. v. C.R. Bard, Inc.	2:14-cv-00161
16	Gilbert, Dawn v. C.R. Bard, Inc.	2:14-cv-00404
17	George, Catherine et al. v. C.R. Bard, Inc.	2:14-cv-00807
18	Izatt, Andrea et al. v. C.R. Bard, Inc.	2:14-cv-02847
19	Robbins, Tina et al. v. C.R. Bard, Inc.	2:14-cv-02877
20	Sanders, Bonnie v. C.R. Bard, Inc.	2:14-cv-04536
21	Solis, Teresa v. C.R. Bard, Inc.	2:14-cv-04542
22	Wright, Brenda v. C.R. Bard, Inc.	2:14-cv-06478
23	Shattuck, Michelle v. C.R. Bard, Inc.	2:14-cv-08261
24	Nicholas, Patricia v. C.R. Bard, Inc.	2:14-cv-08544
25	Stamey, Kristie et al. v. C.R. Bard, Inc.	2:14-cv-08612
26	Landers, Samantha v. C.R. Bard	2:13-cv-26574
27	Raines, Cynthia Ann v. C.R. Bard	2:13-cv-26748
28	Pace, Paula v. C.R. Bard	2:13-cv-26872
29	Smith, Tamela v. C.R. Bard	2:13-cv-30640
30	Silverio, Lourdes v. C.R. Bard	2:14-cv-14208
31	Guerrero, Angelia v. C.R. Bard	2:14-cv-14209
32	Cowart, Maryanne v. C.R. Bard	2:14-cv-24243
33	Stapel, Catherine v. C.R. Bard	2:14-cv-25362
34	Silvia, Diane v. C.R. Bard	2:14-cv-25366
35	Stetter, Eunice v. C.R. Bard	2:14-cv-27454
36	Edwards, Claudine v. C.R. Bard	2:14-cv-27463
37	Stewart, Mary Sue v. C.R. Bard	2:14-cv-27466
38	Gritten, Linda M v. C.R. Bard	2:16-cv-03707
39	Drake, Theresa v. C.R. Bard	2:16-cv-03709
40	Jones, Thelma J v. C.R. Bard	2:16-cv-03719
41	Keisling, Linda v. C.R. Bard	2:16-cv-03721
42	Ledwein, Judy v. C.R. Bard	2:16-cv-03778
43	Henderson, Teresa v. C. R. Bard	2:16-cv-03779
44	Toulson, Patricia v. C.R. Bard	2:16-cv-03816
45	Struble, Maureen v. C.R. Bard	2:16-cv-03817
46	Moore, Carol v. C.R. Bard	2:16-cv-03842
47	Putscher, Angela v. C.R. Bard	2:16-cv-03895
48	Pickering, Hope v. C.R. Bard	2:16-cv-03896

EXHIBIT A**Wave 4 cases**

#	CASE STYLE	CASE NUMBER
49	Lopes, Maria v. C.R. Bard	2:16-cv-03897
50	Gardner, Rozetta v. C.R. Bard	2:16-cv-03952
51	Mora, Ada v. C.R. Bard, Inc.	2:15-cv-14568
52	Yarbro, Jana v. C. R. Bard, Inc.	2:16-cv-10952
53	Branscome, Christine v. C.R. Bard, Inc.	2:16-cv-10995
54	Lackey, Danielle v. C. R. Bard, Inc.	2:16-cv-11011
55	Miller, Alice v. C. R. Bard, Inc.	2:16-cv-11014
56	Morgan, Khristina v. C. R. Bard, Inc.	2:16-cv-11016
57	Powell, Mary v. C. R. Bard, Inc.	2:16-cv-11017
58	Teeples, Mistie v. C. R. Bard, Inc.	2:16-cv-11020
59	Swiney, Ernestine v. C. R. Bard, Inc.	2:16-cv-11021
60	Updike, Melody v. C. R. Bard, Inc.	2:16-cv-11035
61	Woodard, Elizabeth v. C. R. Bard, Inc.	2:16-cv-11040
62	Powers, Lisa v. C. R. Bard, Inc.	2:16-cv-11041
63	Martin, Judy v. C. R. Bard, Inc.	2:16-cv-11103
64	McWilliams, Brenda v. C. R. Bard, Inc.	2:16-cv-11104
65	Weber, Erika v. C. R. Bard, Inc.	2:16-cv-11105
66	Rogers, Rosemary v. C. R. Bard, Inc.	2:16-cv-11106
67	Renfroe, Honee v. C. R. Bard, Inc.	2:16-cv-11108
68	Nadeau, Susan v. C. R. Bard, Inc.	2:16-cv-11112
69	Hall, Cardisa v. C. R. Bard, Inc.	2:16-cv-11113
70	Phelps, Inna v. C. R. Bard, Inc.	2:16-cv-11114
71	Rodericks, Rhonda v. C.R. Bard, Inc.	2:16-cv-11115
72	Bivens, Geraldine	2:16-cv-11116
73	Gilbert, April v. C. R. Bard, Inc.	2:16-cv-11118
74	Linda Baker Aaron v. C.R. Bard, Inc.	2:16-cv-11134
75	Brewer, Pamela v. C.R. Bard, Inc.	2:16-cv-11135
76	Enyart, Kathy v. C. R. Bard, Inc.	2:12-cv-03815
77	Ayala, Dana v. C. R. Bard, Inc.	2:12-cv-08081
78	Wheat, Patricia Leigh v. C. R. Bard, Inc.	2:12-cv-08320
79	Bryant, Ann M. v. C. R. Bard, Inc.	2:13-cv-00287
80	Kerley, June v. C. R. Bard, Inc.	2:13-cv-01389
81	Colwell, Kimberly v. C. R. Bard, Inc.	2:13-cv-01390
82	Naumchik, Rosemary v. C. R. Bard, Inc.	2:13-cv-02152
83	Mishoe, Rebecca v. C. R. Bard, Inc.	2:13-cv-02668
84	Suchy, Darlene v. C. R. Bard, Inc.	2:13-cv-04711
85	McKenzie, Zula v. C. R. Bard, Inc.	2:13-cv-05210
86	Hutchings, Mildred v. C. R. Bard, Inc.	2:13-cv-08267
87	Horn, Michelle v. C. R. Bard, Inc.	2:13-cv-08673
88	Norton, Dorothy v. C. R. Bard, Inc.	2:13-cv-08677
89	Dickey, Linda v. C. R. Bard, Inc.	2:13-cv-22530
90	Fralin, Marlyn v. C. R. Bard, Inc.	2:13-cv-22531
91	Broderick, Annette v. C. R. Bard, Inc.	2:13-cv-22537
92	Fernandez, Sandra v. C. R. Bard, Inc.	2:13-cv-26363
93	Dover, Jerri v. C. R. Bard, Inc.	2:13-cv-27462
94	Emert, Linda v. C. R. Bard, Inc.	2:13-cv-27635
95	Elrod, Patricia v. C. R. Bard, Inc.	2:13-cv-27652
96	Hollifield, Verta v. C. R. Bard, Inc.	2:13-cv-28084

EXHIBIT A**Wave 4 cases**

#	CASE STYLE	CASE NUMBER
97	Gustin, Debra v. C. R. Bard, Inc.	2:13-cv-28999
98	Schmidt, Patricia v. C. R. Bard, Inc.	2:13-cv-29409
99	Link, Linda v. C. R. Bard, Inc.	2:13-cv-29520
100	Beer, Rebecca v. C. R. Bard, Inc.	2:13-cv-30586
101	Frankie Lee vs. C. R. Bard, Inc.	2:12-cv-07570
102	Nora DeGarmo v. C. R. Bard, Inc.	2:12-cv-07578
103	Donna Sue Holmes v. C. R. Bard, Inc.	2:13-cv-01523
104	Robin Holmes v. C. R. Bard, Inc.	2:13-cv-01524
105	Stephanie Nall v. C. R. Bard, Inc.	2:13-cv-01526
106	Donna Seay v. C. R. Bard, Inc.	2:13-cv-01988
107	Carol Fischbach v. C. R. Bard, Inc.	2:13-cv-03053
108	Maria Gramaglia v. C. R. Bard, Inc.	2:13-cv-05571
109	Judy Priddy v. C. R. Bard, Inc.	2:13-cv-10318
110	Michelle Speetzen v. C. R. Bard, Inc.	2:13-cv-12416
111	Gloria Gardiner v. C. R. Bard, Inc.	2:13-cv-15209
112	Lorraine Leyba v. C. R. Bard, Inc.	2:13-cv-16401
113	Carmen Newell v. C. R. Bard, Inc.	2:13-cv-16405
114	Robin Shirer v. C. R. Bard, Inc.	2:13-cv-16408
115	Hellon Stewart v. C. R. Bard, Inc.	2:13-cv-17070
116	Mary Radatz v. C. R. Bard, Inc.	2:13-cv-17989
117	Nancy Johnson v. C. R. Bard, Inc.	2:13-cv-19736
118	Kathleen McGowan v. C. R. Bard, Inc.	2:13-cv-20431
119	Pamela Long v. C. R. Bard, Inc.	2:13-cv-20881
120	Laura Baker v. C. R. Bard, Inc.	2:13-cv-21342
121	Kathy Carnahan v. C. R. Bard, Inc.	2:13-cv-24208
122	Karen Lewis v. C. R. Bard, Inc.	2:13-cv-31238
123	Sloane Stoddard v. C.R. Bard, Inc.	2:14-cv-11940
124	Roseann Aquino v. C. R. Bard, et al.	2:16-cv-10805
125	Cathy Brown v. C. R. Bard, Inc.	2:16-cv-10807
126	Jude, Linda et al v. C. R. Bard, Inc.	2:12-cv-01333
127	Moore, Yvonne et al v. C. R. Bard, Inc.	2:12-cv-02725
128	Chrastecky, Donna et al v. C. R. Bard, Inc.	2:12-cv-06841
129	Skinner, Alice v. C. R. Bard, Inc.	2:12-cv-09632
130	Sciulla, Gina et al v. C. R. Bard, Inc.	2:13-cv-03291
131	Hiebenthal, Jennifer v. C. R. Bard, Inc.	2:13-cv-04544
132	Parrotte, Cynthia v. C. R. Bard, Inc.	2:13-cv-04594
133	Nicholson, Lisa et al v. C. R. Bard, Inc.	2:13-cv-06629
134	Cruse, Jennifer et al v. C. R. Bard, Inc.	2:13-cv-08256
135	McClinock, Berta et al v. C. R. Bard, Inc.	2:13-cv-14745
136	Spencer, Diane v. C. R. Bard, Inc.	2:13-cv-18752
137	Hannig, Sandy et al v. C. R. Bard, Inc.	2:13-cv-30814
138	Alexander, Lois et al v. C. R. Bard, Inc. et	2:13-cv-30975
139	Cassada, Cheryl v. C. R. Bard, Inc.	2:13-cv-30998
140	Price, Lisa et al v. C. R. Bard, Inc.	2:13-cv-31106
141	Zurinsky, Cheryl v. C. R. Bard, Inc.	2:13-cv-31141
142	Armintrout, Jonette v. C. R. Bard, Inc.	2:13-cv-33474
143	Broschious, Kosumi et al v. C. R. Bard, Inc. et	2:13-cv-33523
144	Brown, Barbara v. C. R. Bard, Inc.	2:13-cv-33524

EXHIBIT A**Wave 4 cases**

#	CASE STYLE	CASE NUMBER
145	Garcia, Tina et al v. C. R. Bard, Inc.	2:13-cv-33590
146	Hunt, Joyce et al v. C. R. Bard, Inc.	2:13-cv-33628
147	Mealor, Jodi v. C. R. Bard, Inc.	2:13-cv-33757
148	Midkiff, April v. C. R. Bard, Inc.	2:13-cv-33764
149	Orbaker, Tina v. C. R. Bard, Inc.	2:13-cv-33832
150	Tavera, Sylvia v. C. R. Bard, Inc.	2:13-cv-33984
151	Rebecca Fugate v. C.R. Bard	2:13-cv-28335
152	Lana Knowles v. C.R. Bard	2:13-cv-28465
153	Nancy Vega v. C.R. Bard	2:13-cv-28475
154	Patricia Nash v. C.R. Bard	2:13-cv-28511
155	Freda Campbell v. C.R. Bard	2:13-cv-28516
156	Donna Vezakis v. C.R. Bard	2:13-cv-28526
157	Katherine Heckman v. C.R. Bard	2:13-cv-29706
158	Denise Fujimoto v. C.R. Bard	2:13-cv-29708
159	Melissa Coleman v. C.R. Bard	2:13-cv-29710
160	Cynthia Clark v. C.R. Bard	2:13-cv-29711
161	Annette Keefer v. C.R. Bard	2:13-cv-29718
162	Naomi Limas v. C.R. Bard	2:13-cv-30143
163	Elizabeth Philpot v. C.R. Bard	2:13-cv-30146
164	Kristen Matejka v. C.R. Bard	2:13-cv-30156
165	Kristi Speer v. C.R. Bard	2:13-cv-31086
166	Olsa Queen v. C.R. Bard	2:13-cv-31091
167	Dawn Wilson v. C.R. Bard	2:13-cv-31804
168	Cynthia Millard v. C.R. Bard	2:13-cv-33305
169	Teresa Zachary v. C.R. Bard	2:13-cv-33319
170	Susan Perry v. C.R. Bard	2:14-cv-00895
171	Tami Keck v. C.R. Bard	2:14-cv-03714
172	Deanna Cochran v. C.R. Bard	2:14-cv-06963
173	Debora Kay Foreman v. C.R. Bard	2:14-cv-06965
174	Maria Palumbo Yaccarino v. C.R. Bard	2:14-cv-06966
175	Sheila Lee v. C.R. Bard	2:14-cv-10669
176	Lea Ann Hughes et al v. C.R. Bard, Inc.	2:12-cv-05960
177	Carolyn Grim et al v. C.R. Bard, Inc.	2:12-cv-06422
178	Paula Wolfe v. C.R. Bard, Inc.	2:13-cv-00165
179	Maria Devine v. C.R. Bard, Inc.	2:13-cv-00233
180	Phyllis Dunn v. C.R. Bard, Inc.	2:13-cv-02809
181	Shirley Magers et al v. C.R. Bard, Inc.	2:13-cv-08365
182	Larisa Howell v. C.R. Bard, Inc.	2:13-cv-20548
183	Patricia Rutledge v. C.R. Bard, Inc.	2:13-cv-20551
184	Linda Kleinmark v. C.R. Bard, Inc.	2:13-cv-20556
185	Rebecca Damian et al v. C.R. Bard, Inc.	2:13-cv-20560
186	Linda Whitehead et al v. C.R. Bard, Inc.	2:13-cv-23318
187	Debbie Montine v. C.R. Bard, Inc.	2:13-cv-23330
188	Janet Martinez et al v. C.R. Bard, Inc.	2:13-cv-23859
189	Rotha Hudson et al v. C.R. Bard, Inc.	2:13-cv-23879
190	Arlene Berg et al v. C.R. Bard, Inc.	2:13-cv-23900
191	Lisa White et al v. C.R. Bard, Inc.	2:13-cv-23905
192	Shirley Michelle Ehrlich et al v. C.R. Bard, Inc.	2:14-cv-05271

EXHIBIT A**Wave 4 cases**

#	CASE STYLE	CASE NUMBER
193	Julia Santos et al v. C.R. Bard, Inc.	2:14-cv-20322
194	Teresa Murillo et al v. C.R. Bard, Inc.	2:14-cv-23935
195	Anjeleana Degi v. C.R. Bard, Inc.	2:15-cv-00339
196	Patsy Stitz v. C.R. Bard, Inc.	2:15-cv-03391
197	Joan Brewster v. C.R. Bard, Inc.	2:15-cv-03393
198	Syreeta Thomas v. C.R. Bard, Inc.	2:15-cv-04361
199	Emmy Vernick v. C.R. Bard, Inc.	2:15-cv-06981
200	Wendy Venosh v. C.R. Bard, Inc.	2:15-cv-06983
201	Norma Jean Beserra v. C.R. Bard, Inc.	2:12-cv-01143
202	Teanna Byrd v. C.R. Bard, Inc.	2:12-cv-02965
203	Precious Morgan v. C.R. Bard, Inc.	2:12-cv-07004
204	Janet and Roger Anderson v. C.R. Bard, Inc.	2:12-cv-00822
205	Sharon W. Larzelere v. C.R. Bard, Inc.	2:12-cv-09016
206	Tammy D. Blackwell, et al. v. C.R. Bard, Inc.	2:13-cv-02766
207	Betty M. El-Didi, et al. v. C.R. Bard, Inc.	2:13-cv-06166
208	Tracy and Michael Achy v. C.R. Bard, Inc.	2:13-cv-17209
209	Christina Lynn Ramirez v. C.R. Bard, Inc.	2:13-cv-2266
210	Karen Lee Justice & Gregory Lee Justice, Sr. v. C.R. Bard, Inc.	2:13-cv-26796
211	Patricia Rose Lacy v. C.R. Bard, Inc.	2:13-cv-27824
212	Lorretta L. Rogers, et al. v. C.R. Bard, Inc.	2:13-cv-27826
213	Carol Sue Wilmeth, et al. v. C.R. Bard, Inc.	2:13-cv-27828
214	Suzanne A. McIntosh v. C.R. Bard, Inc.	2:13-cv-28789
215	Mearle S. Binan, et al. v. C.R. Bard, Inc.	2:13-cv-29339
216	Sherry R. Reeves v. C.R. Bard, Inc.	2:13-cv-31575
217	Angela D. Tryan v. C.R. Bard, Inc.	2:13-cv-32248
218	Catherine Mount v. C.R. Bard, Inc.	2:13-cv-32304
219	Anne Oshman v. C.R. Bard, Inc.	2:13-cv-32305
220	Carrie A. Johnson v. C.R. Bard, Inc.	2:13-cv-33053
221	Phyllis M. Tokar v. C.R. Bard, Inc.	2:14-cv-00395
222	Connie Ortiz v. C.R. Bard, Inc.	2:14-cv-14248
223	Katherine M. McDonald and William McDonald v. C.R. Bard, Inc.	2:14-cv-15113
224	Kristy and Dean Marney v. C. R. Bard, Inc.	2:14-cv-15114
225	Denise and Shawn Burns v. C. R. Bard, Inc.	2:14-cv-15389
226	Anna Murrow and Stacy Murrow v. C.R. Bard, Inc.	2:12-cv-04984
227	Lisa Jacoby v. C.R. Bard, Inc.	2:12-cv-06391
228	Marinda Wilson v. C.R. Bard, Inc.	2:12-cv-06470
229	Tina Hubner and James Hubner v. C.R. Bard, Inc.	2:12-cv-07079
230	Terry Stidham and Ira Stidham v. C.R. Bard, Inc.	2:13-cv-03321
231	Jenny Santiago v. C.R. Bard, Inc.	2:13-cv-10496
232	Juliet Chirino and Jose Chirino v. C.R. Bard, Inc.	2:13-cv-24515
233	Cathleen Carrillo and Paul Carrillo v. C.R. Bard, Inc.	
234	Neva Dickson v. C.R. Bard, Inc., et al.	2:12-cv-00619
235	Mary Lee Smith, et al. v. C.R. Bard, Inc.	2:12-cv-00812
236	Aurelia Lambrecht v. C.R. Bard, Inc.	2:12-cv-01725
237	Donna Cook v. C.R. Bard, Inc.	2:12-cv-02118

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238	Dayna Rice v. C.R. Bard, Inc.	2:12-cv-02505
239	Lynette L. Swarts, et al. v. C.R. Bard, Inc.	2:13- cv-19575
240	Wendy Ryan v. C.R. Bard, Inc.	2:13-cv-10194
241	Sam D'Angelo v. C.R. Bard, Inc., et al.	2:13-cv-11499
242	Patrice Zephro v. C.R. Bard, Inc.	2:13-cv-08607
243	Kisha Bush Fuller v. C.R. Bard, Inc.	2:14-cv-19736
244	Valerie Kaye Griffith v. C.R. Bard, Inc.	2:14-cv-23928
245	Elizabeth Diane Morgan v. C.R. Bard, Inc.	2:14-cv-25902
246	Gilberta Smith, et al. v. C.R. Bard, Inc.	2:14-cv-28486
247	Alica Salgado, et al. v. C.R. Bard, Inc.	2:14-cv-31139
248	Leah Ann Springman, et al. v. C. R. Bard, Inc.	2:14-cv-31156
249	Kimberly Blevins v. C.R. Bard, Inc.	2:15-cv-04290
250	Michelle Frances King v. C.R. Bard, Inc.	2:15-cv-04296
251	Tara Jewell Preator, et al. v. C.R. Bard, Inc.	2:15-cv-04297
252	Tina Wilkins, et al. v. C.R. Bard, Inc.	2:15-cv-05492
253	Marta P. Gardunio v. C.R. Bard, Inc.	2:15-cv-13190
254	Velma Holbrooks, et al. v. C.R. Bard, Inc.	2:15-cv-13199
255	Kelly Deason v. C.R. Bard, Inc.	2:15-cv-15835
256	Michelle Lynne Rotter, et al. v. C. R. Bard, Inc.	2:15-cv-05491
257	Susan F. Spence, et al. v. C.R. Bard, Inc.	2:16-cv-01610
258	Veronica Lee Madsen, et al. v. C.R. Bard, Inc.	2:16-cv-11633
259	Rebecca Brown v. C. R. Bard, Inc.	2:12-cv-02220
260	Doris Burnett v. C. R. Bard, Inc.	2:12-cv-04345
261	Lora Herron v. C. R. Bard, Inc.	2:12-cv-04348
262	Brenda J. Dube v. C. R. Bard, Inc.	2:12-cv-04567
263	Tina Esparza v. C. R. Bard, Inc.	2:12-cv-06870
264	Betty McFatrige v. C. R. Bard, Inc.	2:13-cv-21486
265	Michelle Morris v. C. R. Bard, Inc.	2:13-cv-21488
266	Beverly R. Major v. C. R. Bard, Inc.	2:13-cv-22336
267	Kelly R. Hamilton-Sullivan v. C. R. Bard, Inc.	2:13-cv-22341
268	Joyce A. Hinchey v. C.R. Bard, Inc.	2:13-cv-23211
269	Janie P. Brogdon v. C. R. Bard, Inc.	2:13-cv-23223
270	Brenda Larsen v. C. R. Bard, Inc.	2:13-cv-24205
271	Arena Perry v. C. R. Bard, Inc.	2:14-cv-00752
272	Rosetta Fagan v. C. R. Bard, Inc.	2:14-cv-00767
273	Carol Jennings v. C. R. Bard, Inc.	2:14-cv-11098
274	Tracey Covey v. C. R. Bard, Inc.	2:14-cv-13560
275	Deborah Ward v. C.R. Bard, Inc.	2:11-cv-00904
276	Allura Fine v. C.R. Bard, Inc.	2:12-cv-04481
277	Rhonda Azbill v. C.R. Bard, Inc.	2:12-cv-05465
278	Deborah Meador v. C.R. Bard, Inc.	2:12-cv-06367
279	Kathy Summers v. C.R. Bard, Inc.	2:12-cv-09670
280	Cheryl Baugh v. C.R. Bard, Inc.	2:12-cv-12677
281	Roanna Gardner-Onks v. C.R. Bard, Inc.	2:13-cv-00873
282	Jeannette Perez v. C.R. Bard, Inc.	2:13-cv-01025
283	Kimberly Moubray v. C.R. Bard, Inc.	2:13-cv-02139
284	Patricia Gabler v. C.R. Bard, Inc.	2:13-cv-04813
285	Jennifer Davison v. C.R. Bard, Inc.	2:13-cv-08983

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286	Linda Johnson v. C.R. Bard, Inc.	2:13-cv-09324
287	Tammie Noll v. C.R. Bard, Inc.	2:13-cv-09635
288	Mary Linsner v. C.R. Bard, Inc.	2:13-cv-10034
289	Nancy Warbutton v. C.R. Bard, Inc.	2:13-cv-01028
290	Debra Hartzo v. C.R. Bard, Inc.	2:13-cv-10326
291	Belinda Smith v. C.R. Bard, Inc.	2:13-cv-11655
292	Tamara LeBeau v. C.R. Bard, Inc.	2:13-cv-11811
293	Cynthia Slate v. C.R. Bard, Inc.	2:13-cv-11949
294	Tamilia Yanke v. C.R. Bard, Inc.	2:13-cv-12190
295	Tajuana Sullivan v. C.R. Bard, Inc.	2:13-cv-12206
296	Donna Wheeler v. C.R. Bard, Inc.	2:13-cv-12390
297	Donna Cox v. C.R. Bard, Inc.	2:13-cv-12622
298	Arlene Bennett v. C.R. Bard, Inc.	2:13-cv-13234
299	Lizethee Graciano v. C.R. Bard, Inc.	2:13-cv-13245
300	Demetria Richardson v C.R. Bard, Inc.	2:12-cv-02564
301	Cynthia Richardson v. C.R. Bard, Inc.	2:13-cv-20036
302	Mary Afraidofhawk v. C.R. Bard, Inc.	2:13-cv-27000
303	Carolyn Myers v. C.R. Bard, Inc.	2:13-cv-30052
304	Niki A. Hummel v C.R. Bard, Inc.	2:13-cv-32359
305	Lori Barker v. C.R. Bard, Inc.	2:13-cv-33690
306	Carolyn S. Moore v. C.R. Bard, Inc.	2:14-cv-00606
307	Brenda Black v. C.R. Bard, Inc.	2:14-cv-00952
308	Shannon Massey v. C.R. Bard, Inc.	2:14-cv-01027
309	Kathleen Politi-Topal v. C.R. Bard, Inc.	2:14-cv-01411
310	Carolyn Cuffee v C.R. Bard, Inc.	2:14-cv-02528
311	Irma Vela Walton v C.R. Bard, Inc.	2:14-cv-04309
312	Julia Sheaffer v C.R. Bard, Inc.	2:14-cv-05601
313	Dedra Cooley v. C.R. Bard, Inc.	2:14-cv-07543
314	Debra Hodo v C.R. Bard, Inc.	2:14-cv-07565
315	Janet Ford v C.R. Bard, Inc.	2:14-cv-09878
316	Elizabeth Wilson v. C.R. Bard, Inc.	2:14-cv-14119
317	Loretta Thompson v C.R. Bard, Inc.	2:14-cv-14488
318	Kim Purcell v. C.R. Bard, Inc.	2:14-cv-34058
319	Joyce E. Steffy v C.R. Bard, Inc.	2:13-cv-24844
320	Elena Martinez v C.R. Bard, Inc.	2:13-cv-24849
321	Karen F. Keller v C.R. Bard, Inc.	2:13-cv-24850
322	Elizabeth M. and Michael Sanborn v C.R. Bard, Inc.	2:13-cv-24853
323	Kerry and Donald A. Pichard v C.R. Bard, Inc.	2:14-cv-24747
324	Donna Eilf v C.R. Bard, Inc.	2:14-cv-26473
325	Dawn Hammel v C.R. Bard, Inc.	2:15-cv-00620
326	Shaunna and William Schoneman v C.R. Bard, Inc.	2:15-cv-02461
327	Jennifer Brulatour v C.R. Bard, Inc.	2:15-cv-04353
328	Maria Polanco v CR Bard Inc.	2:15-cv-06997
329	Claudia and Richard D. Fake v C.R. Bard, Inc.	2:15-cv-08436
330	Kennesha Kellar v C.R. Bard, Inc.	2:15-cv-11694
331	Susanna and Daniel Bermudez v C.R. Bard, Inc.	2:15-cv-11748
332	Mary Mendez v C.R. Bard, Inc.	2:16-cv-01279
333	Debra Belstad v C.R. Bard, Inc.	2:16-cv-01999