

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

**CHARLESTON DIVISION**

IN RE: AMERICAN MEDICAL SYSTEMS, INC.  
PELVIC SUPPORT SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL 2325

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THIS DOCUMENT RELATES TO CASES  
IDENTIFIED ON EXHIBITS A and B

**PRETRIAL ORDER # 267  
(Docket Control Order – American Medical Systems, Inc. Wave 4 Cases)**

The cases on Exhibit A have resided on the inactive docket beginning as early as **January 1, 2015**, through **July 1, 2017**. Despite representations in inactive docket orders proposed by the parties and entered by the court, that the cases on Exhibit A have been settled or entered into a settlement model, and despite repeated warnings by the court that cases will not remain on the inactive docket indefinitely, the number of cases on the inactive docket remains in the thousands.

To address this issue, in addition to the court's decision to end the parties' ability to place cases on the inactive docket beginning November 1, 2018 (as accomplished by a previous Pretrial Order), the court finds it necessary to return the cases on Exhibit A to the active docket and place them on the scheduling order set forth below. The cases on Exhibit B are not flagged as inactive in this MDL and are not currently subject to a docket control order, and the court now enters the scheduling order set forth below as to those cases as well.

Accordingly, the court **ORDERS** that the cases on Exhibits A are:

1. removed from the pending inactive docket; and
2. placed on the active docket.

As to the cases on Exhibits A and B, the court further **ORDERS** that:

1. The cases are *no longer eligible for return to the inactive docket nor may notices of settlement be filed to relieve the parties from scheduling deadlines;*

2. *To the extent other defendants, in addition to American Medical Systems, Inc. (“AMS”), are named in the cases on Exhibits A and B, the deadlines below also apply to them;*

3. The Clerk will file this Docket Control Order in the main MDL and, as of the time of that filing in the main MDL, every case listed on Exhibits A and B (hereinafter referred to as “Wave 4 cases”) becomes subject to the deadlines in this Docket Control Order. This Docket Control Order will be placed in each individual case as quickly as administratively possible; and

4. The following deadlines immediately apply in all Wave 4 cases with *one important exception. If any of the cases on any exhibit were previously on a docket control order and dispositive and Daubert deadlines had passed before such cases became inactive, the parties may not file or refile dispositive or Daubert motions without first seeking leave of court for good cause shown. While the court is returning cases to the active docket, it is not the court’s intention to allow a new round of pleadings or a second bite at the apple for cases already worked up in previous waves.*

A. **SCHEDULING DEADLINES.** The following deadlines shall apply in all Bard

Wave 4 cases:

Plaintiff Fact Sheets. <sup>1</sup>	11/15/2018
Defendant Fact Sheets. <sup>2</sup>	11/22/2018
Deadline for written discovery requests.	12/21/2018
Expert disclosures served by plaintiffs pursuant to Fed. R. Civ. P. 26 as limited by ¶ 3.a. of this order.	02/22/2019
Expert disclosure served by defendants pursuant to Fed. R. Civ. P. 26 as limited by ¶ 3.a. of this order. <sup>3</sup>	03/22/2019
Expert disclosure served for rebuttal pursuant to Fed. R. Civ. P. 26 as limited by ¶ 3.a. of this order.	03/29/2019
Deposition deadline and close of discovery.	04/29/2019
Filing of dispositive motions.	05/13/2019
Response to dispositive motions.	05/27/2019
Reply to response to dispositive motions.	06/03/2019
Filing of <i>Daubert</i> motions.	05/13/2019
Responses to <i>Daubert</i> motions.	05/27/2019
Reply to response to <i>Daubert</i> motions.	06/03/2019

1. **Completion Date.** The last date to complete depositions shall be the “discovery completion date” by which all discovery shall be completed.

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

- a. Each defendant<sup>4</sup> is limited to 10 interrogatories, 10 requests for production of documents and 10 requests for admission per case.

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<sup>1</sup> The court reminds plaintiffs who have named additional MDL defendants other than the AMS defendants to serve a defendant-specific Plaintiff Fact Sheet as required in that particular defendant’s MDL.

<sup>2</sup> Where plaintiffs have named multiple defendants (i.e., C. R. Bard, Inc., and Ethicon, Inc., Boston Scientific Corp., etc.), each defendant must serve a Defendant Fact Sheet using the form agreed to in that defendant’s MDL.

<sup>3</sup> Paragraph 3.a. of this order states the “the plaintiffs and each defendant are limited to no more than five (5) experts per case (exclusive of treating physicians).”

<sup>4</sup> In referring to the “defendant” or “defendants” throughout this order, it is my intention that a defendant(s) includes the defendant and its related entities, i.e., Ethicon, Inc. and Johnson & Johnson are related entities and treated as one defendant for purposes of these discovery limitations. Likewise, if more than one plaintiff is named, plaintiffs are treated as one entity for purposes of these discovery limitations.

- b. Plaintiffs are limited to 10 interrogatories, 10 requests for production of documents and 10 requests for admission to each defendant.
- c. In each individual member case, no more than 4 treating physicians may be deposed.<sup>5</sup>
- 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. The Deposition of any witness is limited to 3 hours absent agreement of the parties.
- f. The court will consider modifications to the above limitations only upon good cause shown.

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

- a. The parties may conduct general and specific expert discovery on all products at issue in this Wave. In light of the products involved in this Wave, 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, **the plaintiffs and each defendant are limited to no more than five experts per case (exclusive of treating physicians).**
- b. The parties shall coordinate the depositions of general causation experts. Insofar as multiple plaintiffs or multiple defendants use the same general causation expert or experts or general causation rebuttal experts, those experts

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<sup>5</sup> 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.

shall be deposed only once on the issue of general causation. As to defendants' 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 by multiple parties.
- d. The court will consider modifications to the above limitations only upon good cause shown.

4. **Transferring to another MDL, requesting removal from the Wave and extensions of deadlines.**

- a. *Transfer of any case from this wave to any other MDL, whether by ruling upon a motion from plaintiff or defendants or sua sponte by the court, does not relieve the plaintiff or any remaining defendant(s) from the deadlines of this Docket Control Order.*
- b. If an Amended Short Form Complaint properly filed pursuant to Federal Rules of Civil Procedure 15(a), names a new party, then any party may move for an extension to the Docket Control Order.

**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 2325) instead of the individual member case.<sup>6</sup> Each side may file one response and one reply in the main MDL to each *Daubert* motion. This limitation does

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<sup>6</sup> If parties wish to adopt previous *Daubert* motions on general causation experts from other MDLs, they may file a notice of adoption with a copy of the previous filing (if necessary) they wish to adopt in the main MDL 2325.

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 a challenged expert is both a general and specific causation expert, the parties must file a general causation motion in the main MDL 2325 and an individual specific causation motion in an individual member case.

2. **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. The court will not consider pleadings that exceed these limitations.

3. **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. *The court will no longer permit this practice. Parties may no longer file placeholder exhibits.* The court expects leadership counsel for plaintiffs and defendants to resolve issues related to confidential designations well before the filing of motions. 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: Any consolidated motion to seal is due on or before **March 25, 2019**, and any response is due by **April 8, 2019**. Any reply is due by **April 15, 2019**. The court expects full compliance with Local Rule of Civil Procedure 26.4(c).

4. **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 AMS MDL.**

**C. CASES READY FOR TRANSFER, REMAND OR TRIAL**

1. **Venue Recommendations.** By no later than **April 6, 2019**, the parties shall meet and confer concerning the appropriate venue for each of the cases, and the parties are **ORDERED** to submit joint venue recommendations to the court by **April 13, 2019**. The parties' joint recommendation(s) shall identify cases where venue is in dispute. The court may then request briefing.

2. **Transfer and Remand.** The court, pursuant to PTO # 17 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 # 17 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.<sup>7</sup>

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' summary judgment 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 intercourt assignment).

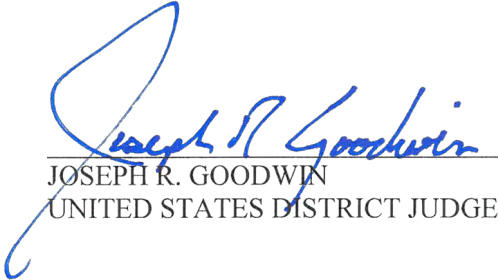
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<sup>7</sup> As expressly contemplated by PTO # 17, AMS does not waive its right to seek transfer—pursuant to 28 U.S.C. § 1406(a) or any other available ground—of any case to a court of proper venue, regardless of whether that case was transferred to or directly-filed in the Southern District of West Virginia. I entered identical PTOs in the remaining MDLs assigned to me.

**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. I direct the parties' attention to PTO # 20<sup>8</sup>, 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. 20, ECF No. 303, ¶ C. The court is of the opinion it is highly unlikely that any work performed by counsel on individual wave cases will be considered common benefit work.

The court **DIRECTS** the Clerk to file a copy of this order in 2:12-md-2325 **and in the AMS Wave 4 cases identified on Exhibits A and B.** 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](http://www.wvsd.uscourts.gov).

ENTER: October 31, 2018

  
JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE

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<sup>8</sup> I entered identical PTOs in the remaining MDLs assigned to me.



**EXHIBIT A****American Medical Systems PTO # 267**

	<b>Civil Action No.</b>	<b>Case Name</b>
1	2:12-cv-00309	Howard et al v. American Medical Systems, Inc.
2	2:12-cv-00366	Wells et al v. American Medical Systems, Inc.
3	2:12-cv-00558	Hicks et al v. American Medical Systems, Inc.
4	2:12-cv-00814	Wilson v. American Medical Systems, Inc.
5	2:12-cv-01015	DeVito et al v. American Medical Systems, Inc.
6	2:12-cv-01411	Tobin et al v. American Medical Systems, Inc.
7	2:12-cv-01688	Palmer et al v. American Medical Systems, Inc.
8	2:12-cv-01870	Mullins et al v. American Medical Systems, Inc.
9	2:12-cv-01913	Bubbico v. American Medical Systems, Inc.
10	2:12-cv-01934	Davey v. American Medical Systems, Inc. et al
11	2:12-cv-01951	Bynum et al v. American Medical Systems, Inc. et al
12	2:12-cv-02106	Holland v. American Medical Systems, Inc. et al
13	2:12-cv-02397	Sills v. Endo Pharmaceuticals et al
14	2:12-cv-02569	Bradford et al v. American Medical Systems, Inc. et al
15	2:12-cv-02976	Esquivel et al v. American Medical Systems, Inc. et al
16	2:12-cv-03380	Berry et al v. American Medical Systems, Inc. et al
17	2:12-cv-04234	Ayres v. American Medical Systems, Inc.
18	2:12-cv-04606	Wilson v. American Medical Systems, Inc.
19	2:12-cv-04607	Reyes et al v. American Medical Systems, Inc.
20	2:12-cv-04625	Johnson v. American Medical Systems, Inc.
21	2:12-cv-04711	Gibson v. American Medical Systems, Inc.
22	2:12-cv-04782	Ellis et al v. American Medical Systems, Inc. et al
23	2:12-cv-04784	Davis v. American Medical Systems, Inc. et al
24	2:12-cv-05482	Morales v. American Medical Systems, Inc.
25	2:12-cv-05514	Esparza et al v. American Medical Systems, Inc. et al
26	2:12-cv-05564	Garcia et al v. American Medical Systems, Inc. et al
27	2:12-cv-05771	LaRosa et al v. American Medical Systems, Inc.
28	2:12-cv-05989	Hicks v. American Medical Systems, Inc. et al
29	2:12-cv-06082	Davis v. American Medical Systems, Inc. et al
30	2:12-cv-06362	Arnall et al v. American Medical Systems, Inc. et al
31	2:12-cv-06398	Callaghan et al v. American Medical Systems, Inc. et al
32	2:12-cv-06414	Durham et al v. American Medical Systems, Inc. et al
33	2:12-cv-06836	Stockman et al v. American Medical Systems, Inc. et al
34	2:12-cv-07372	Drummond et al v. American Medical Systems, Inc. et al
35	2:12-cv-07385	Banks v. American Medical Systems, Inc. et al
36	2:12-cv-07489	Eschette et al v. American Medical Systems, Inc. et al
37	2:12-cv-07604	Harris v. American Medical Systems, Inc. et al
38	2:12-cv-07635	Pichon-Jones et al v. American Medical Systems, Inc. et al
39	2:12-cv-07722	Forrest et al v. American Medical Systems, Inc. et al
40	2:12-cv-08344	Verzosa et al v. American Medical Systems, Inc. et al
41	2:12-cv-08796	Hansing et al v. American Medical Systems, Inc.
42	2:12-cv-08947	Williams v. American Medical Systems, Inc. et al
43	2:12-cv-09054	Corn et al v. American Medical Systems, Inc. et al
44	2:12-cv-09789	Houser v. American Medical Systems, Inc. et al
45	2:12-cv-09824	Bridges et al v. American Medical Systems, Inc. et al
46	2:13-cv-00127	Van et al v. American Medical Systems, Inc. et al
47	2:13-cv-00394	Myers et al v. American Medical Systems, Inc. et al

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	<b>Civil Action No.</b>	<b>Case Name</b>
48	2:13-cv-00573	Milner v. American Medical Systems, Inc. et al
49	2:13-cv-00669	Gaal v. American Medical Systems, Inc. et al
50	2:13-cv-00680	Stetsko et al v. American Medical Systems, Inc. et al
51	2:13-cv-00682	King-Young et al v. American Medical Systems, Inc. et al
52	2:13-cv-00694	Foley v. American Medical Systems, Inc. et al
53	2:13-cv-01346	Miller v. American Medical Systems, Inc. et al
54	2:13-cv-01610	Daniel-Bergman v. American Medical Systems, Inc.
55	2:13-cv-01900	Sanford v. American Medical Systems, Inc.
56	2:13-cv-01978	Jones v. American Medical Systems, Inc.
57	2:13-cv-02316	Myers et al v. American Medical Systems, Inc. et al
58	2:13-cv-02518	Radenberg et al v. American Medical Systems, Inc.
59	2:13-cv-02915	Cumpton et al v. American Medical Systems, Inc. et al
60	2:13-cv-03554	Williams v. American Medical Systems, Inc. et al
61	2:13-cv-03748	Gardner v. American Medical Systems, Inc. et al
62	2:13-cv-04218	Crane v. American Medical Systems, Inc. et al
63	2:13-cv-04901	Spencer v. Boston Scientific Corporation
64	2:13-cv-05433	Kenyon v. American Medical Systems, Inc. et al
65	2:13-cv-05495	Keller et al v. American Medical Systems, Inc. et al
66	2:13-cv-05577	Severino et al v. American Medical Systems, Inc. et al
67	2:13-cv-05806	Carvell v. Boston Scientific Corporation
68	2:13-cv-06151	Doyle et al v. American Medical Systems, Inc. et al
69	2:13-cv-06903	Horn et al v. American Medical Systems, Inc.
70	2:13-cv-06907	Madison et al v. American Medical Systems, Inc. et al
71	2:13-cv-07791	Eitel v. American Medical Systems, Inc.
72	2:13-cv-08391	Whirley et al v. American Medical Systems, Inc.
73	2:13-cv-08617	Whiles et al v. American Medical Systems, Inc. et al
74	2:13-cv-09179	Wilhelm v. Boston Scientific Corporation
75	2:13-cv-09443	Hall et al v. American Medical Systems, Inc. et al
76	2:13-cv-09577	Amaya v. American Medical Systems, Inc.
77	2:13-cv-09793	Cook v. Boston Scientific Corporation
78	2:13-cv-09855	Wilson et al v. American Medical Systems, Inc.
79	2:13-cv-10324	Skaggs et al v. American Medical Systems, Inc.
80	2:13-cv-10710	Miller v. American Medical Systems, Inc. et al
81	2:13-cv-10767	Hibbard v. American Medical Systems, Inc.
82	2:13-cv-11025	Forbes et al v. American Medical Systems, Inc.
83	2:13-cv-11249	Eklund et al v. American Medical Systems, Inc. et al
84	2:13-cv-11719	Toboz v. American Medical Systems, Inc.
85	2:13-cv-12025	Myers v. American Medical Systems, Inc.
86	2:13-cv-12254	Smisek-Gage v. American Medical Systems, Inc.
87	2:13-cv-12295	Griffis et al v. American Medical Systems, Inc.
88	2:13-cv-12686	Danielson v. American Medical Systems, Inc.
89	2:13-cv-12697	Hancock v. American Medical Systems, Inc.
90	2:13-cv-12782	Perez et al v. American Medical Systems, Inc.
91	2:13-cv-12801	Diaz v. American Medical Systems, Inc.
92	2:13-cv-12815	Moye-Wiley et al v. American Medical Systems, Inc.
93	2:13-cv-12824	Dowdell v. American Medical Systems, Inc. et al
94	2:13-cv-12963	Wheeler et al v. American Medical Systems, Inc.

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	<b>Civil Action No.</b>	<b>Case Name</b>
95	2:13-cv-13294	Corbine v. American Medical Systems, Inc.
96	2:13-cv-13300	Fisher et al v. American Medical Systems, Inc.
97	2:13-cv-13302	Federizo et al v. American Medical Systems, Inc.
98	2:13-cv-13404	Sliger v. American Medical Systems, Inc.
99	2:13-cv-13484	Bennett v. American Medical Systems, Inc.
100	2:13-cv-13656	Ramirez et al v. American Medical Systems, Inc.
101	2:13-cv-13862	Korink v. American Medical Systems, Inc.
102	2:13-cv-14266	Remick v. American Medical Systems, Inc.
103	2:13-cv-14651	Cherland et al v. American Medical Systems, Inc.
104	2:13-cv-15040	Wilson v. American Medical Systems, Inc.
105	2:13-cv-15271	Shelby et al v. American Medical Systems, Inc.
106	2:13-cv-15746	Hartley et al v. American Medical Systems, Inc.
107	2:13-cv-16098	Wages et al v. American Medical Systems, Inc.
108	2:13-cv-16177	Dempsey-McGriff v. American Medical Systems, Inc.
109	2:13-cv-16824	Vasquez et al v. Boston Scientific Corporation
110	2:13-cv-17167	Saenz-Oseguera et al v. American Medical Systems, Inc.
111	2:13-cv-17678	Garza et al v. American Medical Systems, Inc.
112	2:13-cv-18277	Puentes et al v. American Medical Systems, Inc.
113	2:13-cv-18378	Brown v. American Medical Systems, Inc.
114	2:13-cv-18445	Armendariz et al v. Boston Scientific Corporation
115	2:13-cv-18650	Vallejo-Tirado et al v. American Medical Systems, Inc.
116	2:13-cv-18660	Rojas et al v. Boston Scientific Corporation
117	2:13-cv-18977	Peterson et al v. American Medical Systems, Inc. et al
118	2:13-cv-19123	Ross v. American Medical Systems, Inc.
119	2:13-cv-19393	Rodriguez et al v. Boston Scientific Corporation et al
120	2:13-cv-19395	Franco et al v. American Medical Systems, Inc.
121	2:13-cv-19908	Smith v. American Medical Systems, Inc.
122	2:13-cv-19982	Heim et al v. American Medical Systems, Inc.
123	2:13-cv-20039	Smith et al v. American Medical Systems, Inc.
124	2:13-cv-20503	Stephens v. American Medical Systems, Inc.
125	2:13-cv-20604	Smith et al v. Boston Scientific Corporation
126	2:13-cv-21030	Guillen et al v. American Medical Systems, Inc.
127	2:13-cv-21421	Woodall v. American Medical Systems, Inc.
128	2:13-cv-21871	Miller et al v. American Medical Systems, Inc.
129	2:13-cv-21947	Barrett et al v. American Medical Systems, Inc.
130	2:13-cv-22068	Machacek et al v. American Medical Systems, Inc.
131	2:13-cv-22070	Mitchell v. American Medical Systems, Inc.
132	2:13-cv-22085	Pruitt et al v. American Medical Systems, Inc.
133	2:13-cv-22308	Robison et al v. American Medical Systems, Inc.
134	2:13-cv-22794	Galloway v. American Medical Systems, Inc.
135	2:13-cv-22993	Matejck v. American Medical Systems, Inc.
136	2:13-cv-23069	Blanton v. American Medical Systems, Inc.
137	2:13-cv-23156	Nelson-Griggs v. American Medical Systems, Inc.
138	2:13-cv-23617	Ray v. American Medical Systems, Inc.
139	2:13-cv-23775	Jarquín et al v. American Medical Systems, Inc.
140	2:13-cv-23846	Knopé v. American Medical Systems, Inc.
141	2:13-cv-24402	Bonilla-Lainez v. American Medical Systems, Inc.

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	<b>Civil Action No.</b>	<b>Case Name</b>
142	2:13-cv-24685	Blake et al v. American Medical Systems, Inc.
143	2:13-cv-25469	Garcia v. American Medical Systems, Inc.
144	2:13-cv-25479	Heck v. American Medical Systems, Inc.
145	2:13-cv-25567	Raines et al v. American Medical Systems, Inc.
146	2:13-cv-25884	Steinkamp v. American Medical Systems, Inc.
147	2:13-cv-25900	Burchell v. American Medical Systems, Inc.
148	2:13-cv-25957	Montana v. American Medical Systems, Inc.
149	2:13-cv-26050	Richards v. American Medical Systems, Inc.
150	2:13-cv-26168	Sanders et al v. American Medical Systems, Inc.
151	2:13-cv-26333	Johnson v. American Medical Systems, Inc.
152	2:13-cv-26482	Godfrey et al v. American Medical Systems, Inc.
153	2:13-cv-26562	Kamera v. American Medical Systems, Inc.
154	2:13-cv-26772	Sanchez v. American Medical Systems, Inc.
155	2:13-cv-27160	Locke v. American Medical Systems, Inc.
156	2:13-cv-27199	Hackler v. American Medical Systems, Inc.
157	2:13-cv-27543	Babineaux et al v. American Medical Systems, Inc.
158	2:13-cv-27653	Kamke v. American Medical Systems, Inc.
159	2:13-cv-28433	Kosloske v. American Medical Systems, Inc.
160	2:13-cv-28681	Cordell et al v. Boston Scientific Corporation
161	2:13-cv-29078	Graciani et al v. American Medical Systems, Inc.
162	2:13-cv-29136	Dominguez v. Boston Scientific Corporation
163	2:13-cv-29162	Pittman et al v. American Medical Systems, Inc.
164	2:13-cv-29196	Morris v. American Medical Systems, Inc.
165	2:13-cv-29338	Cox v. American Medical Systems, Inc.
166	2:13-cv-29348	Caracci-Siddons v. American Medical Systems, Inc.
167	2:13-cv-29650	Casto v. American Medical Systems, Inc.
168	2:13-cv-29680	Harbour v. American Medical Systems, Inc.
169	2:13-cv-30170	Damato et al v. Ethicon, Inc. et al
170	2:13-cv-30585	Mackey et al v. American Medical Systems, Inc.
171	2:13-cv-30624	Rowlett et al v. American Medical Systems, Inc.
172	2:13-cv-30961	Mangrum v. American Medical Systems, Inc.
173	2:13-cv-31179	Lehnerz v. Boston Scientific Corporation
174	2:13-cv-31284	Warso et al v. American Medical Systems, Inc.
175	2:13-cv-31422	Suniga v. American Medical Systems, Inc.
176	2:13-cv-31475	LaBelle v. American Medical Systems, Inc.
177	2:13-cv-31671	Rodriguez v. American Medical Systems, Inc.
178	2:13-cv-31679	Symmank v. American Medical Systems, Inc.
179	2:13-cv-31790	Wilson v. American Medical Systems, Inc.
180	2:13-cv-31837	Overton v. Boston Scientific Corporation
181	2:13-cv-32027	Santamaria et al v. American Medical Systems, Inc.
182	2:13-cv-32373	Sims v. American Medical Systems, Inc.
183	2:13-cv-32383	St. Romain v. American Medical Systems, Inc.
184	2:13-cv-32396	Yagle v. American Medical Systems, Inc.
185	2:13-cv-32404	Dover et al v. American Medical Systems, Inc.
186	2:13-cv-32624	Smith-Pugh et al v. Boston Scientific Corporation
187	2:13-cv-33104	Tovey v. American Medical Systems, Inc.
188	2:13-cv-33347	Crum et al v. American Medical Systems, Inc.

**EXHIBIT A****American Medical Systems PTO # 267**

	<b>Civil Action No.</b>	<b>Case Name</b>
189	2:13-cv-33462	Ragsdell et al v. American Medical Systems, Inc.
190	2:13-cv-33559	De Leon v. American Medical Systems, Inc.
191	2:13-cv-33657	Katsules v. American Medical Systems, Inc.
192	2:13-cv-33941	Shrigley et al v. American Medical Systems, Inc.
193	2:14-cv-00522	Baird v. American Medical Systems, Inc.
194	2:14-cv-01076	Searah v. American Medical Systems, Inc.
195	2:14-cv-01122	Stief v. American Medical Systems, Inc.
196	2:14-cv-01287	Turner et al v. American Medical Systems, Inc.
197	2:14-cv-01331	Brooks et al v. American Medical Systems, Inc.
198	2:14-cv-01734	Horton v. American Medical Systems, Inc.
199	2:14-cv-01795	Hicks v. American Medical Systems, Inc.
200	2:14-cv-02682	Moreno v. American Medical Systems, Inc.
201	2:14-cv-03212	Atencio v. American Medical Systems, Inc.
202	2:14-cv-03228	Adcock et al v. American Medical Systems, Inc.
203	2:14-cv-03364	Garza et al v. American Medical Systems, Inc.
204	2:14-cv-03575	Patterson et al v. American Medical Systems, Inc.
205	2:14-cv-03908	Jarrett v. American Medical Systems, Inc.
206	2:14-cv-04073	Fogelson v. American Medical Systems, Inc.
207	2:14-cv-04514	Manley-Sweetney et al v. American Medical Systems, Inc.
208	2:14-cv-04518	O&#039;Keefe et al v. American Medical Systems, Inc.
209	2:14-cv-04643	Moody et al v. American Medical Systems, Inc.
210	2:14-cv-04957	Cooper v. American Medical Systems, Inc.
211	2:14-cv-05110	Housand v. American Medical Systems, Inc.
212	2:14-cv-05205	Steuck et al v. American Medical Systems, Inc.
213	2:14-cv-05264	Quintana v. American Medical Systems, Inc.
214	2:14-cv-05745	Waynauskas et al v. Boston Scientific Corporation
215	2:14-cv-06217	Perlow et al v. American Medical Systems, Inc.
216	2:14-cv-06444	Wall v. American Medical Systems, Inc.
217	2:14-cv-06490	Williams v. American Medical Systems, Inc.
218	2:14-cv-07559	Gustafson et al v. American Medical Systems, Inc.
219	2:14-cv-07824	Addison v. American Medical Systems, Inc.
220	2:14-cv-08200	Cole et al v. American Medical Systems, Inc.
221	2:14-cv-09460	Rayner v. American Medical Systems, Inc.
222	2:14-cv-09497	Justice et al v. American Medical Systems, Inc.
223	2:14-cv-09631	Beard et al v. American Medical Systems, Inc.
224	2:14-cv-09655	Hunter v. American Medical Systems, Inc. et al
225	2:14-cv-09661	Horton v. American Medical Systems, Inc. et al
226	2:14-cv-10288	Myers et al v. American Medical Systems, Inc.
227	2:14-cv-10473	Steele v. American Medical Systems, Inc.
228	2:14-cv-10527	Howard v. American Medical Systems, Inc.
229	2:14-cv-10604	Richardson et al v. American Medical Systems, Inc.
230	2:14-cv-10689	Archer v. American Medical Systems, Inc.
231	2:14-cv-11253	Garrison et al v. American Medical Systems, Inc.
232	2:14-cv-11276	Ware-Perosi et al v. American Medical Systems, Inc. et ak
233	2:14-cv-11378	Roberts et al v. American Medical Systems, Inc.
234	2:14-cv-11812	Schaublin v. American Medical Systems, Inc.
235	2:14-cv-11960	Sherlock v. American Medical Systems, Inc.

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	<b>Civil Action No.</b>	<b>Case Name</b>
236	2:14-cv-12067	Milligan v. American Medical Systems, Inc.
237	2:14-cv-12203	Portillo et al v. American Medical Systems, Inc.
238	2:14-cv-12237	Aplaca v. American Medical Systems, Inc.
239	2:14-cv-12389	Carpender et al v. American Medical Systems, Inc.
240	2:14-cv-12590	Jojola et al v. American Medical Systems, Inc.
241	2:14-cv-12775	Knutson v. American Medical Systems, Inc.
242	2:14-cv-13054	Young v. American Medical Systems, Inc.
243	2:14-cv-13351	Kelly v. American Medical Systems, Inc.
244	2:14-cv-13427	Mitchell-Cowley v. American Medical Systems, Inc.
245	2:14-cv-13460	Williams v. American Medical Systems, Inc.
246	2:14-cv-13812	Escudero v. American Medical Systems, Inc.
247	2:14-cv-13931	Baker v. American Medical Systems, Inc.
248	2:14-cv-13961	Geer v. American Medical Systems, Inc.
249	2:14-cv-14202	Lunsford et al v. American Medical Systems, Inc.
250	2:14-cv-15290	Custer v. American Medical Systems, Inc.
251	2:14-cv-15310	Mowbray v. American Medical Systems, Inc.
252	2:14-cv-15595	Reich v. American Medical Systems, Inc.
253	2:14-cv-15884	Peterson et al v. American Medical Systems, Inc.
254	2:14-cv-16274	Rugloski v. American Medical Systems, Inc.
255	2:14-cv-16277	Harris v. American Medical Systems, Inc.
256	2:14-cv-17204	Ross v. American Medical Systems, Inc.
257	2:14-cv-17239	Rich v. American Medical Systems, Inc.
258	2:14-cv-17316	Timms v. American Medical Systems, Inc.
259	2:14-cv-17890	Herrera et al v. American Medical Systems, Inc.
260	2:14-cv-18302	Chapa v. American Medical Systems, Inc.
261	2:14-cv-18633	Jacobs et al v. American Medical Systems, Inc.
262	2:14-cv-18798	Petrella v. American Medical Systems, Inc.
263	2:14-cv-19970	Sales v. American Medical Systems, Inc.
264	2:14-cv-20684	Cortinas v. American Medical Systems, Inc.
265	2:14-cv-21106	Bell v. American Medical Systems, Inc.
266	2:14-cv-21745	Nogueria v. American Medical Systems, Inc.
267	2:14-cv-22238	Clement v. American Medical Systems, Inc.
268	2:14-cv-23606	Floyd v. American Medical Systems, Inc.
269	2:14-cv-24767	Harrington v. American Medical Systems, Inc.
270	2:14-cv-24824	Wilson v. Boston Scientific Corporation
271	2:14-cv-24913	Cardona et al v. American Medical Systems, Inc.
272	2:14-cv-25345	Blain v. American Medical Systems, Inc.
273	2:14-cv-25350	Keefe et al v. American Medical Systems, Inc.
274	2:14-cv-25528	Spriggs v. American Medical Systems, Inc.
275	2:14-cv-26389	Brown v. American Medical Systems, Inc.
276	2:14-cv-26421	Dominguez v. American Medical Systems, Inc.
277	2:14-cv-27255	Monahan v. American Medical Systems, Inc.
278	2:14-cv-27426	McGinnis et al v. American Medical Systems, Inc.
279	2:14-cv-27608	Schmieg v. American Medical Systems, Inc.
280	2:14-cv-29651	Railton v. American Medical Systems, Inc.
281	2:14-cv-30427	Williams v. American Medical Systems, Inc.
282	2:14-cv-30765	Smith et al v. American Medical Systems, Inc.

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	<b>Civil Action No.</b>	<b>Case Name</b>
283	2:15-cv-00087	Thomas et al v. American Medical Systems, Inc.
284	2:15-cv-02631	Taggert et al v. American Medical Systems, Inc.
285	2:15-cv-03386	Petty et al v. American Medical Systems, Inc.
286	2:15-cv-03577	Anderson v. American Medical Systems, Inc.
287	2:15-cv-03584	Jencks et al v. American Medical Systems, Inc.
288	2:15-cv-04219	Richmond et al v. American Medical Systems, Inc.
289	2:15-cv-04427	Bowen v. American Medical Systems, Inc.
290	2:15-cv-04434	Jacobsen v. American Medical Systems, Inc.
291	2:15-cv-04465	Naraine v. American Medical Systems, Inc.
292	2:15-cv-04466	Perches v. American Medical Systems, Inc.
293	2:15-cv-04493	Smith v. American Medical Systems, Inc.
294	2:15-cv-05526	Graves v. American Medical Systems, Inc.
295	2:15-cv-07150	Colbert v. American Medical Systems, Inc.
296	2:15-cv-07365	Lee v. American Medical Systems, Inc.

**EXHIBIT B****American Medical Systems PTO # 267**

	<b>Civil Action No.</b>	<b>Case Name</b>
1	2:12-cv-00558	Hicks et al v. American Medical Systems, Inc.
2	2:12-cv-01641	Ramirez v. American Medical Systems, Inc. et al
3	2:12-cv-02851	Guin v. American Medical Systems, Inc. et al
4	2:12-cv-03363	Hartman et al v. American Medical Systems, Inc. et al
5	2:12-cv-04506	Perez et al v. American Medical Systems, Inc. et al
6	2:12-cv-04528	Owens v. American Medical Systems, Inc. et al
7	2:12-cv-06967	Sabotnik v. American Medical Systems, Inc.
8	2:12-cv-09262	Castro et al v. American Medical Systems, Inc.
9	2:13-cv-00294	Mckinley v. American Medical Systems, Inc. et al
10	2:13-cv-00876	Dean et al v. American Medical Systems, Inc. et al
11	2:13-cv-03641	Pickard et al v. American Medical Systems, Inc.
12	2:13-cv-04422	Genz et al v. American Medical Systems, Inc.
13	2:13-cv-05442	Holley v. American Medical Systems Inc.
14	2:13-cv-07660	Keith et al v. American Medical Systems, Inc.
15	2:13-cv-07661	Semrau et al v. American Medical Systems, Inc.
16	2:13-cv-07668	Felder v. American Medical Systems, Inc.
17	2:13-cv-07902	Hamby v. American Medical Systems, Inc.
18	2:13-cv-07907	Bowman et al v. American Medical Systems, Inc.
19	2:13-cv-08572	Guirguis et al v. American Medical Systems, Inc.
20	2:13-cv-08976	Winters v. American Medical Systems, Inc.
21	2:13-cv-09198	Lawler et al v. American Medical Systems, Inc.
22	2:13-cv-09445	Ashworth et al v. American Medical Systems, Inc.
23	2:13-cv-10331	Parker v. American Medical Systems, Inc.
24	2:13-cv-11719	Toboz v. American Medical Systems, Inc.
25	2:13-cv-11940	Gunter v. American Medical Systems, Inc.
26	2:13-cv-12295	Griffis et al v. American Medical Systems, Inc.
27	2:13-cv-12439	Conklin et al v. American Medical Systems, Inc.
28	2:13-cv-13307	Cutshaw v. American Medical Systems, Inc.
29	2:13-cv-14270	Debuque v. American Medical Systems, Inc.
30	2:13-cv-15664	Whatley v. American Medical Systems, Inc.
31	2:13-cv-17957	Pineda et al v. American Medical Systems, Inc.
32	2:13-cv-18022	Price v. American Medical Systems, Inc.
33	2:13-cv-19107	Gill et al v. American Medical Systems, Inc.
34	2:13-cv-20948	Bartley v. American Medical Systems, Inc.
35	2:13-cv-21175	Ybarra v. American Medical Systems, Inc.
36	2:13-cv-21532	Nehls et al v. American Medical Systems, Inc.
37	2:13-cv-23838	Rainey-Burchfield v. American Medical Systems, Inc.
38	2:13-cv-25158	Collins v. American Medical Systems, Inc.
39	2:13-cv-25373	Tarvin et al v. American Medical Systems, Inc.
40	2:13-cv-26448	Cope v. American Medical Systems, Inc.
41	2:13-cv-26525	Land et al v. Boston Scientific Corporation
42	2:13-cv-27322	Smith v. American Medical Systems, Inc.
43	2:13-cv-28072	Gomez et al v. American Medical Systems, Inc.
44	2:13-cv-28349	Clary et al v. American Medical Systems, Inc.
45	2:13-cv-28364	Stull v. American Medical Systems, Inc.
46	2:13-cv-30268	Martinez v. American Medical Systems, Inc.
47	2:13-cv-31059	Weimer v. American Medical Systems, Inc.



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	<b>Civil Action No.</b>	<b>Case Name</b>
48	2:13-cv-31217	Miller v. American Medical Systems, Inc.
49	2:13-cv-31241	Childress v. American Medical Systems, Inc.
50	2:13-cv-31537	Botello v. American Medical Systems, Inc.
51	2:13-cv-32500	Palmer-Shover et al v. American Medical Systems, Inc.
52	2:13-cv-32625	Bonacci v. American Medical Systems, Inc.
53	2:14-cv-00473	Lovern v. American Medical Systems, Inc.
54	2:14-cv-00502	Krykewycz et al v. American Medical Systems, Inc.
55	2:14-cv-01576	Anderson et al v. American Medical Systems, Inc.
56	2:14-cv-02811	McBride v. American Medical Systems, Inc.
57	2:14-cv-04497	Riddle v. American Medical Systems, Inc.
58	2:14-cv-05957	Ramirez et al v. American Medical Systems, Inc.
59	2:14-cv-06312	Holbrook v. American Medical Systems, Inc.
60	2:14-cv-07195	Lane et al v. American Medical Systems, Inc.
61	2:14-cv-10089	Contreras et al v. American Medical Systems, Inc.
62	2:14-cv-10336	McHan v. American Medical Systems, Inc.
63	2:14-cv-10684	Baghvardani v. American Medical Systems, Inc.
64	2:14-cv-15141	More v. American Medical Systems, Inc.
65	2:14-cv-15587	Pfalzer v. American Medical Systems, Inc.
66	2:14-cv-16208	Adkins et al v. American Medical Systems, Inc.
67	2:14-cv-17085	Marquez v. American Medical Systems, Inc.
68	2:14-cv-18111	Johnson et al v. American Medical Systems, Inc.
69	2:14-cv-19438	Curl v. American Medical Systems, Inc.
70	2:14-cv-21608	Watt v. American Medical Systems, Inc.
71	2:14-cv-22451	Riveiro-Herris et al v. American Medical Systems, Inc.
72	2:14-cv-22484	Tyler v. American Medical Systems, Inc.
73	2:14-cv-22870	Wolf et al v. American Medical Systems, Inc.
74	2:14-cv-24489	Ritter-Gardner et al v. American Medical Systems, Inc.
75	2:14-cv-24496	Hill v. American Medical Systems, Inc.
76	2:14-cv-25114	Frank et al v. American Medical Systems, Inc.
77	2:14-cv-26365	Rodriguez et al v. American Medical Systems, Inc.
78	2:15-cv-01689	Humphrey et al v. American Medical Systems, Inc.
79	2:15-cv-02997	Carraway v. American Medical Systems
80	2:15-cv-03743	Gowan et al v. American Medical Systems, Inc.
81	2:15-cv-13562	Steffe v. American Medical Systems, Inc.
82	2:16-cv-01619	Wellons v. American Medical Systems, Inc.
83	2:17-cv-02440	Morton v. Ethicon, Inc. et al
84	2:18-cv-00277	Dubrava v. American Medical Systems, Inc.
85	2:18-cv-00371	Crespo v. American Medical Systems, Inc.
86	2:18-cv-00498	Seiler v. American Medical Systems, Inc.
87	2:18-cv-00528	Larsen v. American Medical Systems, Inc.
88	2:18-cv-00549	Johnson v. American Medical Systems, Inc.
89	2:18-cv-00598	Johns v. American Medical Systems, Inc. et al
90	2:18-cv-00887	Paul v. American Medical Systems, Inc.
91	2:18-cv-00917	Kopplin v. American Medical Systems, Inc.
92	2:18-cv-00918	Silva v. American Medical Systems, Inc.
93	2:18-cv-00919	Nikolai v. American Medical Systems, Inc.
94	2:18-cv-00920	Johnson et al v. American Medical Systems, Inc.

**EXHIBIT B**  
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	<b>Civil Action No.</b>	<b>Case Name</b>
95	2:18-cv-00921	Vickers v. American Medical Systems, Inc.
96	2:18-cv-00922	Lucas v. American Medical Systems, Inc.
97	2:18-cv-00923	Young v. American Medical Systems, Inc.
98	2:18-cv-00924	Zaragoza v. American Medical Systems, Inc.
99	2:18-cv-00925	Perkins v. American Medical Systems, Inc.
100	2:18-cv-00926	Amend v. American Medical Systems, Inc.
101	2:18-cv-01009	Stankowicz et al v. American Medical Systems, Inc.
102	2:18-cv-01010	Zavodny v. American Medical Systems, Inc.
103	2:18-cv-01011	Sherrin et al v. American Medical Systems, Inc.
104	2:18-cv-01031	Burgut et al v. American Medical Systems, Inc.
105	2:18-cv-01032	Strock v. American Medical Systems, Inc.
106	2:18-cv-01064	Lee v. American Medical Systems, Inc. et al
107	2:18-cv-01150	Conway et al v. American Medical Systems, Inc.
108	2:18-cv-01182	Gilliam et al v. American Medical Systems, Inc.
109	2:18-cv-01301	Wright v. American Medical Systems, Inc.
110	2:18-cv-01374	Cherry v. American Medical Systems, Inc.