



Counsel at PRADAXA.MDL.DFS@wgclawfirm.com or a hard copy sent to: David Watts, at Watts Guerra Craft LLP, 5250 Prue Road, Suite 525, San Antonio, Texas 78240.

4. Defendant and its counsel shall use their best efforts to serve the completed DFS on a rolling basis prior to the deadlines set forth in Paragraph 1.

5. If Defendant does not submit a DFS within the time specified in this Order, Plaintiffs may send a Notice of Overdue Discovery letter to Defendant's counsel as follows: [VLodato@sillscummis.com](mailto:VLodato@sillscummis.com) or by mail to Vincent Lodato, Esq., Sills Cummis & Gross P.C., One Riverfront Plaza, Newark, New Jersey 07102 ten (10) days after said deadline. Said Notice of Overdue Deficiency letter shall permit fourteen (14) days to cure the overdue DFS. In the event the completed DFS is not provided within such fourteen (14) day period, Plaintiff's counsel shall exercise all reasonable efforts to meet-and-confer with Defendant's counsel (for a period not to exceed five (5) days). If, after the meet-and-confer process, the discovery remains overdue, Plaintiff's counsel shall consult with MDL Lead/Liaison Counsel and may move for appropriate relief from the Court, which shall be on Notice filed by ECF, and permit fourteen (14) days for an opposition, if any. Plaintiffs' co-liaison shall be served (via e-mail) with a copy of all Notice of Overdue Discovery letters and copies of any and all motions under this paragraph.

6. If Plaintiff receives a DFS in the allotted time, but the DFS is not properly completed in Plaintiff's view, then Plaintiff shall send to defense counsel

(as identified in No, 5 above) a deficiency letter identifying the purported deficiencies, with a copy being contemporaneously sent to Plaintiffs' Liaison Counsel. If Defendant believes the DFS was properly completed, the parties shall meet and confer on the issue within fourteen (14) days of defendant's receipt of such notice. Subject to such meet and confer, Defendant shall then have twenty (20) days to serve an amended or supplemental response or advise that it is not amending/supplementing the response.

7. The admissibility of information in the DFS shall be governed by the Federal Rules and no objections are waived by virtue of any DFS response.

8. All information contained in the DFS is confidential and protected under the Protective Order (CMO 2).

**So Ordered:**

 Digitally signed by David  
R. Herndon  
Date: 2013.01.23  
10:49:29 -06'00'

**Chief Judge  
United States District Court**

**Date: January 23, 2013**