

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<u>IN RE: ZOLOFT (SERTRALINE</u>	:	MDL NO. 2342
<u>HYDROCHLORIDE) PRODUCTS</u>	:	12-MD-2342
<u>LIABILITY LITIGATION</u>	:	
	:	HON. CYNTHIA M. RUFÉ
	:	
<u>THIS DOCUMENT APPLIES TO:</u>	:	
<u>ALL ACTIONS</u>	:	

PRETRIAL ORDER NO. 38

AND NOW, this 15th day of October 2013, upon consideration of the application for fees and costs incurred by Special Discovery Master Andrew Chirls for the month of September 2013 (see attached), which was submitted both to the Court and Liaison Counsel pursuant to Pretrial Order No. 22, and finding that the work, fees and costs reflected thereon are “reasonably necessary” for the fulfillment of the Special Discovery Master’s duties, and without objection from counsel, it is hereby **ORDERED** that the application for fees and costs is **APPROVED** in full. Accordingly, the parties are responsible for payment of an equal half share of the same.

It is so **ORDERED**.

BY THE COURT:


CYNTHIA M. RUFÉ, J.



Dedicated to the Practice of Relationships

PHILADELPHIA OFFICE

Mellon Bank Center
1735 Market Street, Suite 600
Philadelphia, PA 19103
(215) 893-9300
Fax: (215) 893-8719

NEW JERSEY OFFICE

20 Brace Road, Suite 350
Cherry Hill, NJ 08034
(856) 795-1118
Fax: (856) 795-1110

ANDREW A. CHIRLS

Direct Dial: (215) 893-8715
achirls@finemanlawfirm.com

Please Reply to Philadelphia Office

October 2, 2013

The Honorable Cynthia M. Rufe
United States District Court, Eastern District of
Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Suite 12614
Philadelphia, PA 19106-1797

**RE: In re: Zoloft (Sertraline Hydrochloride) Products Liability Litigation,
MDL No. 2342**

Dear Judge Rufe:

Consistent with the compensation provisions of Pretrial Order No. 22 in the above-captioned matter, I am submitting a statement of counsel fees and costs recorded at my firm from September 1, 2013 through September 30, 2013. I am sending a copy to the attorneys who are to review and submit any comment as called for by Pretrial Order No. 22. I ask that the Court review the charges and approve or modify as it sees fit.

Respectfully,

A handwritten signature in black ink, appearing to read 'A. Chirls', written over the typed name 'ANDREW A. CHIRLS'.

ANDREW A. CHIRLS

AAC/jgm
Enc.

cc: Mark S. Cheffo, Esquire (by email/.pdf)
Katherine Armstrong, esquire (by email/.pdf)
Stephen A. Corr, Esquire (by email/.pdf)
Dianne M. Nast, Esquire (by email/.pdf)
Mark P. Robinson, Jr., Esquire (by email/.pdf)

{00724680;v1}

FINEMAN KREKSTEIN & HARRIS, P.C.

BNY Mellon Center
1735 Market Street Suite 600
Philadelphia, PA 19103
(215) 893-9300
TIN 23-2176745

October 01, 2013

Parties in Zoloft Multi-District Product
Liability on Litigation

Invoice # 59047
Client # 8864
Billing through 09/30/2013

Re: Special Discovery Master Matters Our File No.: 8864/00001

PROFESSIONAL SERVICES

09/03/13	AAC	Correspondence re: upcoming conferences and motions	0.20 hrs
09/04/13	AAC	Review recent order	0.10 hrs
09/05/13	ECR	Discuss facts; preliminary research on choice of law issue.	0.50 hrs
09/06/13	AAC	Call to Judge Rufe's chambers re: procedures and re: R&R No. 3	0.20 hrs
09/07/13	AAC	Submissions of memos and exhibits from both sides	2.60 hrs
09/09/13	AAC	Correspondence re: request for clarification and/or objection to Report and Recommendation No. 3; brief emails to court re: logistics of report and recommendation objection; review attachments; research re selection of cases and PSC	2.20 hrs
09/10/13	AAC	Correspondence re: motions, review submissions and exhibits	2.10 hrs
09/11/13	AAC	Review recent pleadings as related to pending discovery issues	0.40 hrs
09/12/13	AAC	Prepare for negotiation/discovery dispute session	0.50 hrs
09/13/13	AAC	Prepare for meeting; meeting with parties; brief follow up	3.60 hrs
09/14/13	AAC	Review Michigan and Texas motions and motions re: withdrawal; review Report & Recommendation 3 to prepare for next Report & Recommendation.	1.00 hrs
09/16/13	AAC	Opinion/report and recommendation No. 4; brief report from counsel on status of discovery negotiations; review Robinson case materials.	4.00 hrs
09/17/13	AAC	Report & Recommendation 4; discussions re: resolution with PSC.	0.80 hrs

09/18/13	AAC	Report & Recommendation 4; review motions.	1.50 hrs
09/19/13	EB	Review and revise Report and Recommendation No. 4. Confer with A. Chirls.	0.40 hrs
09/19/13	AAC	Complete Report & Recommendation 4; emails with parties updating on status of discovery discussions and schedules; submissions by PSC on two issues as to which plaintiff seeks relief in discovery; correspondence re: next agendas for conferences; review filings in Robinson case.	3.20 hrs
09/20/13	AAC	Correspondence to parties re: next conference; correspondence to court re: status and status of related cases; submission from PSC re: scope of general causation expert reports .	0.90 hrs
09/26/13	ECR	Review documents; confer with AAC re: discovery issues.	0.60 hrs
09/29/13	AAC	review submissions re: Laughren report, review report, email re: informal statement of views and question on need for formal statement of same; Review and consider letter briefs and exhibits from both sides on Pfizer non-responsiveness withholding;	3.40 hrs
09/30/13	ECR	Review party submissions on discovery issues; confer with AAC regarding opinion.	2.10 hrs
09/30/13	AAC	conf. re: research on defendants' request for production and motions re: same; email re: expert report scope	0.50 hrs
		Bachove, Evan	0.40 hrs 270.00 \hr \$108.00
		Chirls, Andrew	27.20 hrs 525.00 \hr \$14,280.00
		Rosenberg, Eric C	3.20 hrs 195.00 \hr \$624.00
		Total fees for this matter	30.80 hrs <hr/> \$15,012.00

EXPENSES

Lexis Research	10.57
Lexis Research	11.26
Catering Service (conference)	258.56
	<hr/> \$280.39

Billing Summary

Total Professional Services	\$15,012.00
Total Expenses	+ \$280.39
Total of new charges for this invoice	<hr/> \$15,292.39

8864

U.S. District Court

Invoice# 59047

Page 3

Total Balance Now Due

\$15,292.39