

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

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

PRETRIAL ORDER NO. 43

AND NOW, this 22nd day of November 2013, upon consideration of the application for fees and costs incurred by Special Discovery Master Andrew Chirls for the month of October 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

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ANDREW A. CHIRLS

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Please Reply to Philadelphia Office

November 1, 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 October 1, 2013 through October 31, 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 a printed name.

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)

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November 01, 2013

Parties in Zolof Multi-District Product
Liability on Litigation

Invoice # 59403
Client # 8864
Billing through 11/01/2013

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

PROFESSIONAL SERVICES

10/01/13	AAC	Emails re: next conference calls.	0.30 hrs
10/02/13	ECR	Discovery issues; conference call; draft memorandum opinion.	2.40 hrs
10/02/13	AAC	Conference; prepare for conference; brief call with court re: scheduling; follow up question with lead counsel; discuss research with E. Rosenberg.	1.30 hrs
10/03/13	ECR	Draft R&R #5 re: discovery of mental history and substance abuse records.	5.10 hrs
10/03/13	AAC	Correspondence re: motion re: medical records and employment records.	0.30 hrs
10/04/13	ECR	Draft R&R #5.	6.40 hrs
10/04/13	AAC	Call with Court; call with D. Nast re: administrative issues; emails with co-lead counsel re: scheduling and administrative points; discuss research w/ E. Rosenberg.	1.40 hrs
10/07/13	AAC	Discussions and emails re: scheduling of trial, pretrial proceedings and dates set out in trial pool selection protocol.	0.50 hrs
10/08/13	ECR	Complete draft of R&R No. 5, confer with AAC.	2.60 hrs
10/08/13	AAC	Discussions re: scheduling negotiations.	0.50 hrs
10/09/13	AAC	Conference call with parties re: scheduling; call with court; additional emails.	0.50 hrs
10/10/13	ECR	Confer with Andy Chirls regarding draft of R&R No. 5; edit draft for submission.	2.30 hrs

10/10/13	AAC	Review Report & Recommendation 5 draft, discuss with E. Rosenberg.	1.70 hrs
10/11/13	ECR	Finalize R&R No. 5 per AAC remarks.	2.00 hrs
10/11/13	AAC	Correspondence re: Report & Recommendation 5.	0.40 hrs
10/14/13	AAC	Work on opinion re: defendants' discovery requests	1.50 hrs
10/15/13	ECR	Correspondence with PSC and Pfizer; confer with Andy Chirls regarding discovery issues.	0.40 hrs
10/15/13	AAC	Work on two reports and recommendations	2.20 hrs
10/16/13	AAC	Emails re: setting up non-responsiveness argument; emails and call re: scheduling; additional work on two reports and recommendations	1.60 hrs
10/17/13	ECR	Review correspondence from PSC and Pfizer regarding law of privilege in various states; compare with proposed R&R No. 5.	0.60 hrs
10/17/13	AAC	Various emails re: discovery	0.60 hrs
10/18/13	AAC	Opinion; discussions with parties	2.70 hrs
10/21/13	AAC	Opinion on discovery; research.	3.40 hrs
10/22/13	AAC	Calls re: scheduling of landmark dates for hearings and submissions; Report And Recommendation 5; Research Report And Recommendation 6.	3.00 hrs
10/23/13	AAC	Email re: next status conference, call re: scheduling thereof; review materials on nonresponsiveness issue.	1.00 hrs
10/24/13	AAC	Discuss conference and scheduling.	0.20 hrs
10/25/13	AAC	Emails re: scheduling of trial and many activities before then, including calls to court; review as against various PTOs, such as 23, and Report and Recommendations 3 and 4.	0.60 hrs
10/26/13	AAC	Emails re: conferences.	0.20 hrs
10/28/13	AAC	Review additional submission on nonresponsiveness withholding.	0.20 hrs
10/29/13	AAC	Prepare for conference call; conference call.	1.50 hrs
10/30/13	AAC	Various calls and emails	0.40 hrs
10/31/13	ECR	Research Third Circuit case law on "burdensome" standard in discovery matters.	1.00 hrs
10/31/13	AAC	Finish R&R 6; conference call re: scheduling issues and other matters	3.20 hrs

Chirls, Andrew	29.20 hrs	525.00 \hr	\$15,330.00
Rosenberg, Eric C	22.80 hrs	195.00 \hr	\$4,446.00
Total fees for this matter	52.00 hrs		<u>\$19,776.00</u>

EXPENSES

Andrew A. Chirls; Invoice # 8864/00001; 9/27/13 Taxi fares	18.00
	<u>\$18.00</u>

Billing Summary

Total Professional Services	\$19,776.00
Total Expenses	+ \$18.00
Total of new charges for this invoice	<u>\$19,794.00</u>
Total Balance Now Due	<u><u>\$19,794.00</u></u>