

**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. 46**

AND NOW, this 24th day of January 2014, upon consideration of the application for fees and costs incurred by Special Discovery Master Andrew Chirls for the month of December 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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achirls@finemanlawfirm.com

**Please Reply to Philadelphia Office**

January 6, 2014

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 December 2, 2013 through December 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,  
  
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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TIN 23-2176745

January 03, 2014

Parties in Zolofit Multi-District Product  
Liability on Litigation

Invoice # 60318  
Client # 8864  
Billing through 12/31/2013

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

## PROFESSIONAL SERVICES

12/02/13	AAC	Agenda for next call; review motion papers.	0.70 hrs
12/03/13	ECR	Review correspondence between PSC and Pfizer; review parties' submissions to special master in anticipation of conference call.	1.40 hrs
12/03/13	AAC	Review additional motion papers and second motion papers; correspondence and calls re: both motions; call w/ chambers re: trial pool selection.	1.40 hrs
12/04/13	ECR	Review PSC's submission in response to Pfizer's brief regarding discovery deficiencies in several of the pool cases.	1.60 hrs
12/04/13	AAC	Submissions from parties re: requests for relief on discovery issues and re: length of depositions and rules re: going off the record during witness refreshment of recollection.	2.40 hrs
12/05/13	ECR	Review correspondence between parties; summarize Pfizer's response letter for records.	0.70 hrs
12/05/13	AAC	Additional submission from parties; conference call with parties.	1.10 hrs
12/06/13	ECR	Conference call with Pfizer and PSC regarding scheduling of depositions and document production, which includes medical authorizations; discussions w/Special Master Chirls.	1.00 hrs
12/06/13	AAC	Conference call with parties; prepare for call; review submissions; follow up email.	1.60 hrs
12/07/13	AAC	Emails from parties and to court.	0.30 hrs
12/11/13	ECR	Review update from Pfizer regarding discovery including medical authorization forms, ESI and photographs.	0.30 hrs

12/13/13	AAC	Emails and review of documents to prepare for conference call of 12/16.	0.90 hrs
12/14/13	AAC	Review correspondence re: next conference call with parties; review document designated as confidential; review PTO 8.	0.50 hrs
12/16/13	ECR	Conference call between PSC and Pfizer regarding status of MDL, discovery issues, dismissal of certain MDL cases, scheduling, etc...	0.90 hrs
12/16/13	AAC	Conference call and preparation for conference call.	0.90 hrs
12/17/13	AAC	Review plaintiffs' request for relief on custodial production.	0.10 hrs
12/18/13	AAC	Calls with J. Zonies and K. Armstrong.	0.40 hrs
12/19/13	AAC	Agenda for call; follow up emails.	0.40 hrs
12/20/13	ECR	Conference call with PSC and Pfizer; record minutes for the file.	0.60 hrs
12/20/13	AAC	Prepare for call; conference call with parties.	0.40 hrs
12/24/13	ECR	Review and analyze Pfizer's 12/23/13 letter brief to Special Master Chirls regarding discovery issues; review exhibits detailing discovery responses from Plaintiffs.	0.80 hrs
12/24/13	AAC	Review motion and related papers; calls and emails re: same; discuss with E. Rosenberg.	0.50 hrs
12/24/13	AAC	Call with D. Nast; additional emails; call with M. Cheffo.	0.50 hrs
12/27/13	AAC	Call with court; review materials submitted.	0.50 hrs
12/28/13	AAC	Review court filings.	0.70 hrs
12/29/13	AAC	Review letters from PSC.	0.30 hrs
12/30/13	AAC	Prepare for conference call; review status of pending motions; conference call; emails to follow up on conference call.	2.10 hrs
12/31/13	ECR	Conference call regarding discovery.	1.30 hrs

Chirls, Andrew	15.70 hrs	525.00 \hr	\$8,242.50
Rosenberg, Eric C	8.60 hrs	195.00 \hr	\$1,677.00
Total fees for this matter	24.30 hrs		<u>\$9,919.50</u>

Billing Summary

Total Professional Services	\$9,919.50
Total of new charges for this invoice	<u>\$9,919.50</u>
<b>Total Balance Now Due</b>	<b><u>\$9,919.50</u></b>