

**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. 34**

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

August 5, 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 firm from July 1, 2013 through July 31, 2013. I ask that the Court review and approve the charges. I am serving a copy on Plaintiffs' and Defendants' Liaison counsel and on Plaintiffs' Co-Lead Counsel.

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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August 01, 2013

Parties in Zolof Multi-District Product  
Liability on Litigation

Invoice # 58190  
Client # 8864  
Billing through 07/31/2013

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

## PROFESSIONAL SERVICES

07/01/13	AAC	Email to parties; correspondence with court.	0.50 hrs
07/01/13	AAC	Review recent filings.	0.20 hrs
07/02/13	AAC	Correspondence re: next conference.	0.10 hrs
07/03/13	AAC	Correspondence with counsel.	0.10 hrs
07/05/13	AAC	Review submissions by parties.	1.50 hrs
07/09/13	AAC	Emails re: scheduling; review Common Benefit Fund issue and other issues raised in submissions of 7/3.	0.70 hrs
07/10/13	AAC	Review various submissions and drafts, including expenses/common benefit fund order, deposition protocol drafts, case selection drafts, letters about discovery, responses from parties.	4.20 hrs
07/11/13	AAC	Review new papers submitted re: discovery log and common benefit order; emails re: impending meetings; review submissions re: discovery status and efforts; discussion with court.	2.00 hrs
07/12/13	AAC	Review, summarize open issues, some correspondence to parties; memo to court; plan conference.	4.30 hrs
07/13/13	AAC	Review various plaintiff's submissions; administrative correspondence to parties.	2.60 hrs
07/14/13	AAC	Correspondence with parties' counsel.	0.60 hrs
07/15/13	EB	Initial review of various correspondence from both parties and Pre-Trial Orders. Confer with A.Chirls. Review emails and memos from A. Chirls to parties.	2.50 hrs

07/15/13	AAC	Review materials submitted; memo to file; discuss with E. Bachove.	3.70	hrs
07/16/13	AAC	Prepare for meetings.	1.60	hrs
07/17/13	EB	Meeting with A. Chirls and counsel re: outstanding discovery issues.	4.00	hrs
07/17/13	AAC	Meeting with parties and preparation for meeting with parties.	4.70	hrs
07/18/13	EB	Travel to and from federal court and attend status conference.	2.60	hrs
07/18/13	AAC	Prepare for conference with court; travel to and from court; appearance in court; follow up emails and review notices.	3.30	hrs
07/24/13	AAC	Correspondence re: format, agendas and timing of periodic meetings on discovery progress.	0.30	hrs
07/26/13	AAC	Review cases on jurisdiction, including Lexecon, and some points in Manual for Complex Litigation.	0.40	hrs
07/30/13	AAC	Correspondence re: weekly discovery progress calls.	0.10	hrs
		Bachove, Evan	9.10	hrs 270.00 \hr \$2,457.00
		Chirls, Andrew	30.90	hrs 525.00 \hr \$16,222.50
		Total fees for this matter	40.00	hrs <u>\$18,679.50</u>

**EXPENSES**

Lexis Research	45.13
Evan Bachove; Invoice # 8864/00001; 7/18/13 Taxi to/from Federal Courthouse	16.00
	<u>\$61.13</u>

**Billing Summary**

Total Professional Services	\$18,679.50
Total Expenses	+\$61.13
Total of new charges for this invoice	<u>\$18,740.63</u>
<b>Total Balance Now Due</b>	<b><u><u>\$18,740.63</u></u></b>