

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

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

PRETRIAL ORDER NO. 45

AND NOW, this 19th day of December 2013, upon consideration of the application for fees and costs incurred by Special Discovery Master Andrew Chirls for the month of November 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

December 3, 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 November 1, 2013 through November 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 that reads "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)

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December 02, 2013

Parties in Zoloft Multi-District Product
Liability on Litigation

Invoice # 59906
Client # 8864
Billing through 11/30/2013

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

PROFESSIONAL SERVICES

11/01/13	AAC	Calls and correspondence re: revisions to pretrial and trial schedule and milestone calendar; review discovery motion, underlying materials and some cases cited therein.	3.10 hrs
11/02/13	AAC	Review submission re: discovery owed from plaintiffs; emails re: procedures.	0.40 hrs
11/04/13	ECR	Review R&R; confer with A. Chirls.	0.50 hrs
11/04/13	AAC	Emails re: agenda; procedures for scheduling.	0.30 hrs
11/05/13	AAC	Correspondence re: next meetings and review of agendas; correspondence re: submissions to court.	0.40 hrs
11/06/13	AAC	Various correspondence.	0.20 hrs
11/07/13	AAC	Prepare for weekly meeting.	0.30 hrs
11/08/13	AAC	Brief preparation for weekly call; discussion of scheduling and impending hearing with court; Emails re: submissions.	1.00 hrs
11/12/13	AAC	Correspondence with parties; prepare for conference.	0.30 hrs
11/14/13	AAC	Emails re: conference of November 18, 2013; review submission of schedule by the parties; emails re: weekly meetings.	0.50 hrs
11/15/13	AAC	Prepare for conference of 11/19.	0.50 hrs
11/16/13	AAC	Review opinion and briefing on remand.	0.30 hrs
11/18/13	AAC	Hearing; memo re: Reports and Recommendations 3 and 4 as affected by new schedule.	4.30 hrs

11/19/13	AAC	Revise memo re: report and recommendations in light of PTOs 3 and 4; discuss other items for agenda; review materials re: West Virginia protective order motion.	0.60 hrs
11/21/13	AAC	Preparations for weekly conference call.	0.30 hrs
11/22/13	AAC	Weekly phone conference; discussions with court re: scheduling; brief opinion or memo re: Pfizer case selection for initial discovery pool after recent withdrawals; development of agenda; review various submissions of charts of discovery progress; review submissions to West Virginia court.	3.00 hrs
11/23/13	AAC	Prepare draft of pretrial order incorporating trial pool selection protocol and R&Rs 3 and 4 recommendations.	0.50 hrs
11/25/13	AAC	Research deposition timing and conduct issues.	0.50 hrs
11/27/13	AAC	Correspondence re: West Virginia Order and depositions scheduled; call re: PTO re: trial pool selection protocol.	0.20 hrs
		Chirls, Andrew	16.70 hrs 525.00 \hr \$8,767.50
		Rosenberg, Eric C	0.50 hrs 195.00 \hr \$97.50
		Total fees for this matter	17.20 hrs <u>\$8,865.00</u>

EXPENSES

Lexis Research	313.11
Photocopy	19.25
	<u>\$332.36</u>

Billing Summary

Total Professional Services	\$8,865.00
Total Expenses	+\$332.36
Total of new charges for this invoice	<u>\$9,197.36</u>
Total Balance Now Due	<u>\$9,197.36</u>