

BRYAN F. AYLSTOCK (FL, AL, MS)\*  
JUSTIN G. WITKIN (FL, MS)  
DOUGLASS A. KREIS (FL)  
NEIL D. OVERHOLTZ (FL)  
R. JASON RICHARDS (FL, CO)  
BOBBY J. "BRAD" BRADFORD (FL, AL)  
STEPHEN H. ECHSNER (FL)



Aylstock, Witkin,  
Kreis & Overholtz, PLLC

www.AWKOLAW.com

17 EAST MAIN STREET, SUITE 200 • PENSACOLA, FLORIDA 32502  
PHONE: (850) 202-1010 • FAX: (850) 916-7449

D. RENÉE BAGGETT (FL)  
DANIEL J. THORNBURGH (FL, MN)  
NATHAN C. BESS (FL)  
E. SAMUEL "SAM" GEISLER (FL, IL)  
JAMES D. BARGER (PA, NJ)  
ANGEL N. STULL (FL, NY)  
CHELSIE R. WARNER (MT, NV)  
BEN H. ANDERSON (OH, CA)†  
DONNA TAYLOR-KOLIS (OH)†  
CHRISTOPHER J. ZIMMERMAN (OH)†

\*States in which attorney is licensed to practice law

†Of counsel

September 6, 2012

**VIA FACSIMILE – 267-299-5077**

The Honorable Cynthia M. Rufe  
United States District Court  
Eastern District of Pennsylvania  
601 Market Street  
Philadelphia, PA 19106-1797

RE: *In re: Zolof (Sertraline Hydrochloride) Products Liability Litigation*, MDL No. 2342  
Multi-District Coordinator's Report No. 1

Dear Judge Rufe:

This is the Multi-District Coordinator's Report No. 1 concerning pending Zolof MDL cases and pending state court cases filed in Illinois, Missouri, New York, Pennsylvania and West Virginia.

**Eastern District of Pennsylvania**

There are approximately one-hundred-eighty-eight (188) Zolof cases pending in this MDL Court.

**Illinois**

There are fourteen (14) cases pending in two-multi-party complaints and one individual complaint in St. Clair County, Illinois.

*Wilson et al. v. Pfizer* involves eight (8) Plaintiff families.  
*Saville et al. v. Pfizer* involves five (5) Plaintiff families.  
*Ratliff v. Pfizer* has one (1) Plaintiff family involving twins.

*Wilson* and *Saville* are pending before the Honorable Andrew Gleeson and *Ratliff* is pending before the Honorable Vince Lopinot. We have attempted to set up a conference call with Judges Gleeson and Lopinot regarding the pending cases. We have been unable to schedule a call to date.

In *Wilson*, *Saville* and *Ratliff*, written discovery has been served by Plaintiffs and Defendants with responses being served by Pfizer and Plaintiffs in *Wilson* and *Saville*. In *Wilson* and *Saville*,

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Pfizer filed Motions to Dismiss on forum non conveniens grounds and Motions to Sever. Oral argument on both motions was held on July 24, 2012. Those motions are pending. Pfizer has moved to stay further discovery pending coordination with the MDL and resolution of its motions.

Honorable Andrew Gleeson  
Twentieth Judicial Circuit Court  
St. Clair County Building  
10 Public Square  
Belleville, IL 62220  
Telephone: Susan Brem (Clerk) – (618) 825-2338

Honorable Vince Lopinot  
Twentieth Judicial Circuit Court  
St. Clair County Building  
10 Public Square  
Belleville, IL 62220  
Telephone: Susan Brem (Clerk) – (618) 825-2338

Additionally, on July 23, 2012, the Honorable G. Patrick Murphy of the Southern District of Illinois granted Plaintiffs' motion to remand in *Reeves et al. v. Pfizer*, which involved thirty-eight (38) Plaintiff families and was originally filed in St. Clair County, Illinois. On that same day, Pfizer filed a Notice of Appeal with the Court of Appeals for the Seventh Circuit. The appeal is still pending.

### Missouri

There are forty-three (43) cases pending in two multi-party complaints filed in St. Louis County Circuit Court, St. Louis, Missouri.

*Foster, et al. v. Pfizer* involves twenty-three (23) Plaintiff families. A telephone conference was held with the Honorable Steven Russell Ohmer on Friday, August 31, 2012 regarding *Foster*. Written discovery has been served by the Plaintiffs.

*Lancaster, et al. v. Pfizer* involves twenty (20) Plaintiff families. A telephone conference was held with the Honorable Bryan Hettenbach on Tuesday, September 4, 2012, regarding *Lancaster*. Pfizer filed a Motion to Sever in the *Lancaster* case and oral argument was held May 2, 2012. The motion is pending. Written discovery was served by Plaintiffs and responses were served by Pfizer. Plaintiffs have also served deposition notices.

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Honorable Steven Russell Ohmer  
Twenty-First Judicial Circuit of the State of Missouri  
10 N. Tucker Blvd.  
St. Louis, MO 63101  
Telephone: (314) 622-5606

Honorable Bryan Hettenbach  
Twenty-First Judicial Circuit of the State of Missouri  
10 N. Tucker Blvd.  
St. Louis, MO 63101  
Telephone: (314) 622-4381

**New York**

There are seven individual cases pending in New York Supreme Court, one in Oneida County and six in New York County.

The Honorable Justice Bernadette Clark has been out of the office and we have been unable to coordinate a telephone conference regarding the case in Oneida County. To date, written discovery has been served.

A telephone conference has been scheduled for Thursday, September 13, 2012, with Guy Owen, clerk for the Honorable Carol E. Huff regarding the cases in New York County. Written discovery has been served in five of the six pending cases and Pfizer has filed Motions to Dismiss in four of the six cases.

Honorable Justice Bernadette Clark  
Supreme Court, Oneida County  
200 Elizabeth Street  
Utica, NY 13501  
Telephone: (315) 266-4310

Honorable Carol E. Huff  
Supreme Court, Civil Branch, New York County  
60 Centre Street  
New York, NY 10007.  
Telephone: Guy Owen (Clerk) – (646) 386- 3281

**Pennsylvania**

There is one (1) case pending in the Philadelphia County Court of Common Pleas, *Robinson v. Wolters Kluwer, Inc. et al.*

We have initiated contact and sent a letter requesting a telephone conference to the Honorable Marlene Lachman who is presiding over the matter in state court but have been unable to coordinate a telephone conference to date. Written discovery has been served by Plaintiff and responses served by Pfizer. There are no pending motions.

Honorable Marlene Lachman  
Court of Common Pleas of Philadelphia County  
1413 Criminal Justice Center  
1301 Filbert Street  
Philadelphia, PA 19107  
Telephone: (215) 683-7136

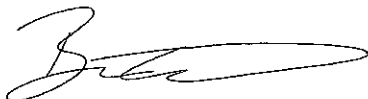
**West Virginia**

There is one case pending in the Circuit Court of Wayne County, West Virginia.

A telephone conference was held with the Honorable James H. Young, Jr. on August 29, 2012, regarding this case. No discovery has been served to date. The case was part of a single complaint involving nineteen (19) Plaintiff families. Each Plaintiff family was docketed as a separate civil action and eighteen (18) of the nineteen (19) cases were removed to federal court by Pfizer. The remand briefing has been completed and an order is expected soon. The case remaining in state court involves a New York Plaintiff and Pfizer has filed a Motion to Dismiss on the grounds of forum non conveniens, which is scheduled to be heard September 24, 2012.

Honorable James H. Young, Jr.  
Twenty-Fourth Judicial Circuit, Wayne County  
P.O. Box 38  
Wayne, WV 25570  
Telephone: (304) 272-6332

Respectfully,



Bryan F. Aylstock

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cc: Katherine Armstrong (via e-mail)  
Mara Cusker Gonzalez (via e-mail)  
Mark Cheffo (via e-mail)  
Catherine Stevens (via e-mail)  
Rachel Passaretti-Wu (via e-mail)  
Kim Lambert (via e-mail)