

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE : ZOFRAN® (ONDANSETRON)
PRODUCTS LIABILITY LITIGATION**

MDL No. 1:15-md-2657-FDS

This document relates to:

All Actions

**DEFENDANT GLAXOSMITHKLINE LLC'S
MOTION FOR ENTRY OF AN ORDER CONCERNING PRODUCT IDENTIFICATION**

Pursuant to Rules 16 and 26 of the Federal Rules of Civil Procedure and Local Rules 16.1(f) and 26.3, Defendant GlaxoSmithKline LLC (“GSK”) respectfully moves for entry of the [Proposed] Order Concerning Product Identification, attached as Exhibit A. GSK specifically seeks documentation of product identification to establish whether a plaintiff used GSK’s brand-name Zofran® or another company’s generic ondansetron product. GSK contemporaneously submits a Memorandum in Support of Its Motion for Entry of an Order Concerning Product Identification.

WHEREFORE, GSK respectfully requests that this Court grant its Motion for Entry of an Order Concerning Product Identification for the reasons set forth in its Memorandum.

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel hereby certifies that, on February 17, 2016, counsel for GSK conferred with Plaintiffs' Lead Counsel in a good faith effort to narrow the issues of dispute without success. Counsel for GSK sent the [Proposed] Order Concerning Product Identification to Plaintiffs' Lead Counsel on February 18, 2016, and invited further discussion or comments. Plaintiffs' Lead Counsel did not offer to discuss or provide comments to the proposed order, but Plaintiffs' Lead Counsel indicated their opposition.

Respectfully submitted,
GLAXOSMITHKLINE LLC,
By its attorneys,

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Dated: February 22, 2016

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Entry of an Order on Product Identification, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent via first class mail to those identified as non-registered participants.

/s/ Madeleine M. McDonough
Madeleine M. McDonough