

ROBINS  KAPLAN LLP

1325 AVENUE OF THE AMERICAS 212 980 7400 TEL
SUITE 2601 212 980 7499 FAX
NEW YORK NY 10019 ROBINSKAPLAN.COM

RAYNA E. KESSLER
212 980 7431 TEL
RKESSLER@ROBINSKAPLAN.COM

June 18, 2024

VIA ECF

Honorable Nicholas G. Garaufis, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room 1426 S
Brooklyn, New York 11201

Re: In re: Exactech Polyethylene Orthopedic Products Liability Litigation -
MDL No. 3044
Docket No. 1:22-md-03044-NGG-MMH

Dear Judge Garaufis:

On behalf of Plaintiffs' Liaison Counsel in the above-referenced MDL Litigation and pursuant to the Court's June 12, 2024 Text Order, please find enclosed the proposed Second Amended Short-Form Complaint for the Court's review and consideration. Plaintiffs' counsel has conferred with all defense counsel, including for TPG, who have consented to this version.

As always, we thank the Court for its time and attention to this matter.

Respectfully submitted,

ROBINS KAPLAN LLP

/s/Rayna E. Kessler, Esq.
Plaintiff Liaison Counsel

cc: All Counsel of Record (via ECF)

Application granted.
So Ordered.

s/Nicholas G. Garaufis

Hon. Nicholas G. Garaufis

Date: 7/2/24