

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

-----X
IN RE: PROPULSID PRODUCTS : **MDL NO. 1355**
LIABILITY LITIGATION :
 : **SECTION: L**
 :
 : **JUDGE FALLON**
 : **MAG. JUDGE AFRICK**
-----X

**JOINT MOTION TO PROVIDE FOR THE IDENTIFICATION OF THE NAME
OF FILING PARTY AND TITLE OF ANY DOCUMENT FILED UNDER SEAL**

NOW INTO COURT, through undersigned counsel, come the Plaintiffs' Liaison Counsel ("PLC") and the Defendants' Liaison Counsel ("DLC"), who represent to the Court as follows:

As may be appropriate under some circumstances, the Clerk has and will continue to accept for filing into the Court record certain documents or pleadings marked as confidential and to be filed under seal. On those occasions, the Clerk has identified such documents in the record as "Sealed Document". The parties desire that the name of the filing party and the title of the document filed under seal be disclosed on the docket sheet so as to afford the parties an opportunity to challenge as may be appropriate, whether a document should be filed under seal. The parties reserve the right to challenge all prior and future documents or pleadings marked as confidential and filed under seal identified as "Sealed Documents."

WHEREFORE, for the above and foregoing reasons Plaintiffs' Liaison Counsel and Defendants

Liaison Counsel respectfully jointly request that the Court enter an Order in the form attached providing for the disclosure of the name of the filing party and the title of the document or pleading to be filed under seal.

Respectfully submitted,

 /s/ Russ M. Herman
RUSS M. HERMAN, T.A. (La. Bar #6819)
LEONARD A. DAVIS, #14190
JAMES C. KLICK, #7451
HERMAN, MATHIS, CASEY & KITCHENS, LLP
820 O'Keefe Avenue
New Orleans, Louisiana 70113
Phone: (504) 581-4892
Fax: (504) 561-6024
LIAISON COUNSEL FOR PLAINTIFFS

DANIEL E. BECNEL, JR.
106 W. Seventh Street
Reserve, LA 70084-0508
Phone: (504) 536-1186
Fax: (504) 536-6445

ARNOLD LEVIN
510 Walnut Street, Suite 500
Philadelphia, PA 19106-3875
Phone: (215) 592-1500
Fax: (215) 592-4663

WENDELL H. GAUTHIER
3600 North Hullen Street
Metairie, LA 70002
Phone: (504) 456-8600
Fax: (504) 456-8624

STEPHEN B. MURRAY
909 Poydras Street, Suite 2550
New Orleans, LA 70112
Phone: (504) 525-8100
Fax: (504) 584-5249

J. MICHAEL PAPANTONIO
316 S. Baylen Street, Suite 600
P.O. Box 12308
Pensacola, FL 32581
Phone: (850) 435-7000
Fax: (850) 435-7020

CHRISTOPHER A. SEEGER
One William Street
New York, NY 10004
Phone: (212) 584-0700
Fax: (212) 584-0799

BOB F. WRIGHT
556 Jefferson Street, Suite 500
Lafayette, LA 70502-3668
Phone: (337) 233-3033
Fax: (337) 232-8213

CHARLES S. ZIMMERMAN
901 North Third Street, Suite 100
Minneapolis, MN 55401-1016
Phone: (612) 341-0400
Fax: (612) 341-0844

PLAINTIFFS' STEERING COMMITTEE

/s/ James B. Irwin

JAMES B. IRWIN, T.A. (La. Bar No. 7172)
QUENTIN F. URQUHART, JR. (La. Bar No. 14475)
KIM E. MOORE (La. Bar No. 18653)
IRWIN FRITCHIE URQUHART & MOORE, LLC
400 Poydras Street, Suite 2700
New Orleans, Louisiana 70130
Phone: (504) 310-2100
Fax: (504) 310-2101
**LIAISON COUNSEL FOR DEFENDANTS,
JANSSEN PHARMACEUTICA INC. AND JOHNSON & JOHNSON**

DRINKER, BIDDLE & SHANLEY LLP
THOMAS F. CAMPION
SUSAN M. SHARKO
500 Campus Drive
Florham Park, NJ 07932-1047
Phone: (973) 549-7300
Fax: (973) 360-9831

-and-

PREUSS, SHANAGHER, ZVOLEFF & ZIMMER
CHARLES F. PREUSS
DONALD F. ZIMMER, JR.
225 Bush Street, 15th Floor
San Francisco, CA 94104-4207
Phone: (415) 397-1730
Fax: (415) 397-1735
**CO-LEAD COUNSEL FOR DEFENDANTS,
JANSSEN PHARMACEUTICA INC. AND
JOHNSON & JOHNSON**

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Joint Motion to Provide for the Identification of Name of Filing Party and Title of Any Document Filed Under Seal of Plaintiffs' and Defendants' Liaison Counsel was served on Plaintiffs' Liaison Counsel by hand and e-mail and by e-service to all parties by uploading same to Verilaw, on this _____ day of June, 2001.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

-----X
: MDL NO. 1355
IN RE: PROPULSID PRODUCTS :
LIABILITY LITIGATION : SECTION: L
: :
: JUDGE FALLON
: MAG. JUDGE AFRICK
-----X

PRETRIAL ORDER NO. 11
(Provide Name of Filing Party and Title of Document Filed Under Seal)

The foregoing Joint Motion for the Identification of Name of Filing Party and Title of Any Document Filed Under Seal being considered;

IT IS ORDERED by the Court that said Motion be and is hereby GRANTED, and the Clerk is instructed to disclose the name of the filing party and the title of all documents or pleadings marked as confidential and heretofore filed or as may be filed under seal into the Court record in the future. The Clerk should indicate this information on the docket sheet .

NEW ORLEANS, LOUISIANA, this ____ day of _____, 2001.

_____/s/_____
Judge Eldon E. Fallon
UNITED STATES DISTRICT COURT JUDGE