

**BEFORE THE UNITED STATES  
JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

In re: ZOFRAN® PRODUCTS  
LIABILITY LITIGATION

MDL No. \_\_\_\_\_

**REASONS WHY ORAL ARGUMENT SHOULD BE HEARD**

Pursuant to Rule 11.1(b) of the Rules of Procedure of the United States Judicial Panel on Multidistrict Litigation, Defendant GlaxoSmithKline LLC (“GSK”), by and through its undersigned counsel, respectfully requests oral argument before the United States Judicial Panel on Multidistrict Litigation on its Motion for Transfer of Actions to the Eastern District of Pennsylvania Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings, filed July 6, 2015, and incorporated here by reference. Oral argument will assist the Panel in understanding the issues surrounding this litigation, the positions of the interested parties, and why this motion for a multidistrict litigation should be granted.

Specifically, the Panel will be advised as to how transferring, coordinating and consolidating these matters will serve the convenience of the parties and witnesses and promote just and efficient resolution of the litigation by, *inter alia*, eliminating duplicative discovery and motion practice, preventing inconsistent pretrial rulings, deterring improper forum and judge shopping, conserving judicial resources, and reducing litigation costs and effort for the parties.

In particular, oral argument will permit discussion of the reasons why the Eastern District of Pennsylvania is the most appropriate forum for an MDL in this litigation, as well as why either the Honorable Cynthia M. Rufe or the Honorable Paul S. Diamond are the judges best

positioned to preside over this litigation, given their substantial and relevant experience handling similar litigation.

Therefore, GSK respectfully requests that the Panel grant this request for oral argument.

Dated: July 6, 2015

Respectfully submitted,

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