

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

**IN RE: CHILDREN BORN  
OPIOID-DEPENDENT**

**MDL - \_\_\_\_\_**

**STATEMENT REGARDING ORAL ARGUMENT**

Counsel for Plaintiffs-Movants<sup>1</sup> respectfully request oral argument before this Judicial Panel on Multidistrict Litigation (“Panel”) with regard to the above-referenced matter. Oral argument will assist the Panel in understanding the issues and challenges raised in this complex litigation.

Movants are Plaintiffs in suits filed on behalf of opioid-dependent infants pending in the Southern District of West Virginia, the Southern District of Ohio, as well as eight cases currently caught up in MDL 2804 in the Northern District of Ohio. Undersigned counsel anticipates that several more substantially similar opioid-dependent infant class action suits will be filed across the country in the coming months. As the volume of these cases is increasing, oral argument also would allow the Movants to update the Panel on the number of filed cases.

Oral argument would respectfully assist the Panel in understanding how transferring, coordinating and consolidating these matters will enhance judicial efficiency and ultimately serve as a more just method of litigation for children born opioid-dependent.

Therefore, Plaintiffs-Movants respectfully request that this Panel grant their request for oral argument.

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<sup>1</sup> Movants are: Deric Rees and Ceonda Rees, individually and as next friend and guardian of Baby T.W.B. on behalf of themselves and all others similarly situated (Illinois Class); Darren and Elena Flanagan, individually and as adoptive parents and next friends of Baby K.L.F., on behalf of themselves and all others similarly situated (Tennessee Class); Rachel Wood, individually and as next friend and adopted mother of Baby O.W., on behalf of themselves and all others similarly situated (Missouri Class); Melissa Ambrosio, individually and as next friend of Baby G.A., and on behalf of themselves and all others similarly situated (California Class); Shannon Hunt, individually and as next friend of Baby S.J., on behalf of themselves and all others similarly situated (Maryland Class); Bobbi Lou Moore on behalf of Baby R.R.C., and all other similarly situated (West Virginia Class); Walter and Virginia Salmons, individually and as the next friend or guardian of Minor W.D. and on behalf of all others similarly situated (National Class).

Respectfully submitted,

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