

ROBINS  KAPLAN LLP

800 LASALLE AVENUE
SUITE 2800
MINNEAPOLIS MN 55402

612 349 8500 TEL
612 339 4181 FAX
ROBINSKAPLAN.COM

K. CRAIG WILDFANG
612 349 8554 TEL
KCWILDFANG@ROBINSKAPLAN.COM

Via Electronic Mail

July 2, 2019

Gary Friedman, Esq.
154 Grand Street, 5th Fl.
New York, NY 10013

Re: MDL 1720 Friedman Law Group Motion to Intervene

Dear Gary:

Thank you for agreeing to a new proposed briefing schedule that we will suggest to the Court, which requires Co-Lead Counsel to respond to your intervention motion by July 31, with a reply if any on August 14 and a proposed hearing date of September 5, 2019.

We are able to advise you now that we intend to oppose your motion to intervene (but respond on the merits) on the grounds that intervention is unnecessary and inappropriate from a procedural perspective since you are already “in” this case as a lawyer and firm who has performed work and advanced expenses on behalf of the class. We believe you already have standing to seek a fee and expense award, which we invited you to do well before the deadline of June 7, 2019. We also believe it is already within the inherent powers of the Court to address the conduct of attorneys who appear before it and to consider the question of whether you are entitled to a portion of any fee and expense award made to class counsel.

Sincerely,

/s/ K. Craig Wildfang

K. Craig Wildfang
Robins Kaplan LLP
800 LaSalle Ave.
Suite 2800
Minneapolis, MN 55402

/s/ H. Laddie Montague, Jr.

H. Laddie Montague, Jr.
Berger & Montague, P.C.
1818 Market St., Ste. 3600
Philadelphia, PA 19103

/s/ Patrick J. Coughlin

Patrick J. Coughlin
**Robbins Geller Rudman
& Dowd LLP**
655 West Broadway
San Diego, CA 92101