

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: E.I. DU PONT DE NEMOURS AND
COMPANY C-8 PERSONAL INJURY
LITIGATION

CASE NO: 2:13-MD-2433

JUDGE EDMUND A. SARGUS, JR.

MAGISTRATE JUDGE ELIZABETH P.
DEAVERS

This document relates to: **Carla Marie Bartlett v. E.I. du Pont de Nemours and Company, Case No. 2:13-cv-160.**

John M. Wolf v. E.I. du Pont de Nemours and Company, Case No. 2:14-cv-095.

**TRIAL PLAINTIFFS' NOTICE OF FILING NON-CONFIDENTIAL VERSIONS OF
EXPERT REPORTS PREVIOUSLY FILED UNDER SEAL**

On February 3, 2015, Plaintiffs Carla Bartlett and Jon Wolf ("Trial Plaintiffs") moved the Court for leave to file the following documents under seal as exhibits to their Opposition to Defendant's Motion to Compel Discovery Responses from Trial Plaintiffs (the "Opposition"), (ECF Nos. 2034 & 2036), on the grounds that the reports referred to information designated "confidential" under the Agreed Protective Order in this MDL, (ECF No. 27):

- Exhibit H: Expert Report for Stephen E. Petty
- Exhibit I: Expert Report of Steven Amter;
- Exhibit J: Expert Report of James S. Smith;
- Exhibit K: Expert Report of Barry S. Levy;

- Exhibit L: Expert Report of Michael B. Siegel; and
- Exhibit M: Expert Report of David L. MacIntosh

After the Court granted the Motion For Leave on February 3, 2015, (ECF No. 2034), Trial Plaintiffs submitted to the Court, under seal, the confidential versions of the expert reports at issue (the "Expert Reports"), and referred to such filings under seal in the exhibits publicly-filed in support of their Opposition. (See ECF. Nos. 2036-9 through 2036-14). Since such time, Trial Plaintiffs have been able to create non-confidential versions of each of the Expert Reports by redacting any purportedly "confidential" information from the confidential versions already on file under seal.

Thus, in an effort to minimize the extent of any information filed under seal in this matter, Trial Plaintiffs are hereby filing the redacted, non-confidential versions of the Expert Reports to be substituted for the documents currently in the public court file at ECF Nos. 2036-9 through 2036-14, with the confidential versions remaining under seal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 26th day of March 2015 and was thus served electronically upon all counsel of record.

s/ Michael A. London
Michael A. London