

Exhibit “A”

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DECLARATION OF JAMES FRICKLETON

1. I am James Frickleton, a partner in the firm of Bartimus Frickleton Robertson & Gorny, P.C. with offices in Leawood, Kansas and Jefferson City, Missouri. An active member in good standing of the bars of Missouri and Kansas, I am admitted *pro hac vice* in this MDL action, and a member of the court-appointed Interim Executive Committee in this action [D.I. 19].

2. I make this declaration in support of the accompanying Plaintiffs’ Motion for Substitution of Attorneys on Interim Executive Committee and Plaintiffs’ Steering Committee (“Plaintiffs’ Substitution Motion”), seeking the Court’s Order substituting Keefe Bartels, LLC as a member of the Interim Executive Committee in this case, in place of Stewarts Law US LLP, and substituting David Straite (former partner in Stewarts Law) in place of Stephen Grygiel (partner in Keefe Bartels) on the Interim Plaintiffs’ Steering Committee (“PSC”).

I certify on oath that:

3. I am and have been directly and substantially involved in the litigation of this case from its inception, including, without limitation, in the drafting of the operative Complaint, briefing the Defendant’s Motion to Dismiss, negotiating the proposed Protective Order, responding to initial discovery and otherwise dealing and communicating with defense counsel and the PSC.

4. Mr. Grygiel as a PSC member and Mr. Straite, as a partner in Stewarts Law, as a member of the Executive Committee, are conversant with the facts and circumstances of his action, have been directly and substantially involved in the litigation of this case from its inception. Mr. Straite and Mr. Grygiel were the lawyers who argued on behalf of the Plaintiffs before this Court during oral arguments on October 5, 2012, see Transcript [D.I. 60] .

5. This substitution of Keefe Bartels, LLC onto the Executive Committee and Mr. Straite onto the PSC is necessary because Mr. Straite’s former firm, Stewarts Law US LLP, has filed its withdrawal from this case in connection with a reduction in the size of its United States operations.

6. This substitution will neither delay nor prejudice this case in any way.

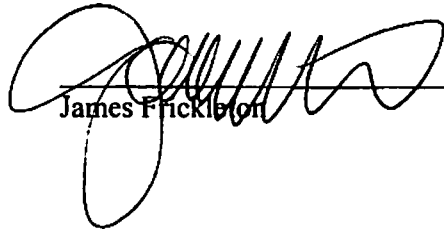
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7. The Defendant has no objection to the Plaintiffs' Motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed June 24th, 2013, at Leward, Kansas.


James Frickleton