

Kristy M. Arevalo, State Bar No. 216308
MCCUNEWRIGHT LLP
2068 Orange Tree Lane, Suite 216
Redlands, CA 92374
Telephone: (909) 557-1250
Facsimile: (909) 557-1275
kma@mccunewright.com

Attorneys for Plaintiffs

James J. McEldrew, III, Esquire
Atty ID # 36411
Thomas A. Dinan
Atty ID # 91344
McELDREW LAW, LLC
123 South Broad Street, Suite 2250
Philadelphia, PA 19109
Telephone: (215) 545-8800
jim@mcedrewlaw.com
tdinan@mcedrewlaw.com

Attorneys for Plaintiffs

Justin R. Parafinczuk
Marcus J. Susen
KOCH PARAFINCZUK & WOLF
110 East Broward Blvd. #1630
Fort Lauderdale, FL 33301
Telephone: 954-462-6700
parafinczuk@kpwlaw.com
susen@kpwlaw.com

Attorneys for Plaintiffs

**BEFORE THE JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

**IN RE: ESSURE PERMANENT BIRTH
CONTROL LITIGATION**

MDL No. 2739

**PLAINTIFFS' MOTION TO WITHDRAW
PLAINTIFFS' MOTION FOR TRANSFER
OF ACTIONS TO THE EASTERN DISTRICT
OF PENNSYLVANIA PURSUANT TO 28
U.S.C. § 1407 FOR COORDINATED OR
CONSOLIDATED PRETRIAL
PROCEEDINGS AND JOINT REQUEST
FOR DISMISSAL WITHOUT PREJUDICE**

NOW COMES Plaintiffs in all of the actions currently pending in the United States District Court for the Eastern District of Pennsylvania (“EDPA”) by and through the undersigned counsel, and hereby notify the Panel pursuant to Panel Rule 6.1(f), that on August 4, 2016, Judge John R. Padova consolidated all of the EDPA cases pending in that district. A copy of the consolidation order is attached hereto as Exhibit A.

As a result of the Consolidation Order, the undersigned counsel seek an order of the Panel dismissing the Motion to Transfer without prejudice.

DATED: August 10, 2016

BY: /s/ Kristy M. Arevalo

Kristy M. Arevalo
kma@mccunewright.com
MCCUNEWRIGHT LLP
2068 Orange Tree Lane, Suite 216
Redlands, CA 92374
Telephone: (909) 557-1250
Facsimile: (909) 557-1275

BY: (with consent) /s/ Thomas A. Dinan

James J. McEldrew, III, Esquire
Thomas A. Dinan
McELDREW LAW, LLC
123 South Broad Street, Suite 1920
Philadelphia, PA 19109
Telephone: (215) 545-8800
jim@mcedrewlaw.com
tdinan@mcedrewlaw.com

BY: (with consent) /s/ Justin R. Parafinczuk

Justin R. Parafinczuk
Marcus J. Susen
KOCH PARAFINCZUK & WOLF
110 East Broward Blvd. #1630
Fort Lauderdale, FL 33301
Telephone: (954) 462-6700
parafinczuk@kpwlaw.com
susen@kpwlaw.com

Attorneys for Plaintiffs