

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**IN RE : ZOFRAN® (ONDANSETRON)
PRODUCTS LIABILITY LITIGATION**

MDL NO. 1:15-md-2657-FDS

This document relates to:

All Actions

**DEFENDANT GLAXOSMITHKLINE LLC'S OMNIBUS
MOTION TO DISMISS AND/OR MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Federal Rules of Civil Procedure 12(b)(6) and 12(c), Defendant GlaxoSmithKline LLC ("GSK") respectfully moves to dismiss all causes of action against it in this multidistrict litigation as preempted by federal law. GSK contemporaneously submits a Memorandum of Law in Support of Its Omnibus Motion to Dismiss and/or Motion for Judgment on the Pleadings.

WHEREFORE, GSK respectfully requests that this Court grant its Omnibus Motion to Dismiss and/or Motion for Judgment on the Pleadings for the reasons set forth in its Memorandum of Law.

REQUEST FOR HEARING

GSK hereby requests oral argument on all matters raised in its Omnibus Motion to Dismiss and/or Motion for Judgment on the Pleadings and supporting Memorandum of Law, as well as all matters raised in any opposition thereto submitted by Plaintiffs.

LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel hereby certifies that counsel for the parties have met and conferred in a good faith effort to narrow the issues of dispute without success.

Respectfully submitted,
GLAXOSMITHKLINE LLC,
By its attorneys,

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Dated: December 11, 2015

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Omnibus Motion to Dismiss and/or Judgment on the Pleadings, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing (“NEF”) and paper copies will be sent via first class mail to those identified as non-registered participants.

/s/ Madeleine M. McDonough
Madeleine M. McDonough