BEFORE THE UNITED STATES
JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

In re: NEVRO CORPORATION SPINAL CORD STIMULATOR PRODUCTS LIABILITY LITIGATION	MDL No. _____

MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR TRANSFER OF ACTIONS PURSUANT TO 28 U.S.C. § 1407

Plaintiffs Melvin Clay, Jr., Victoria Gooding, Margueritte Hawken, Richard Lutke, Anita Manley, J.B. Mounteer, Patricia Ramirez, and James Tripp ("Movants") respectfully submit this Memorandum in Support of their Motion to Transfer certain cases filed against Nevro Corporation ("Nevro") and, where named, Globus Medical, Inc. ("Globus"), pursuant to 28 U.S.C. § 1407(c)(ii) and Rule 6.2(a) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation ("Panel"). Movants respectfully move for transfer of their individual cases, and all related cases included on the Schedule of Actions attached to their Motion for Transfer, to the United States District Court for the Central District of California, for coordinated and/or consolidated pre-trial proceedings.

Specifically, Movants seek transfer of cases in which individual plaintiffs allege that spinal cord stimulator systems marketed by Nevro caused them injury. As of today's date, based on the counsel's research, there are seventeen (17) substantially similar cases pending against Nevro in six (6) different jurisdictions. Nine (9) of these cases also name the United States Food and Drug Administration ("FDA") as a defendant pursuant to the Administrative Procedure Act ("APA"). Movants anticipate that many more cases will be filed in the future.

On June 5, 2026, the Panel transferred related cases concerning the spinal cord stimulators manufactured by Boston Scientific Corporation ("Boston Scientific") to Judge Josephine Staton in the Central District of California. *In re Boston Scientific Corporation Spinal Cord Stimulator Products Liability Litigation*, MDL No. 3181 (Dk. No. 76), June 5, 2026. In conducting its analysis, the Panel found that while it was not appropriate to coordinate and transfer cases involving spinal cord stimulator systems manufactured by different manufacturers into a single MDL proceeding, it found that actions involving the spinal cord stimulator systems manufactured and sold by an individual manufacturer, Boston Scientific, were appropriate for coordination and transfer.

As discussed in more detail below, the exact same analysis and rationale that the Panel used to order the coordinate and transfer the Boston Scientific cases applies here, and particular, the Panel's holding that "the actions naming Boston Scientific involve common questions of fact and that centralization of those actions in the Central District of California will serve the convenience of the parties and witnesses and promote the just and efficient conduct of this litigation." *Id*. at 4.

Further, for the additional reasons discussed herein, centralizing these cases in the Central District of California before Judge Staton, where the JPML recently transferred the Boston Scientific cases, will allow for additional efficiencies as many of the legal and scientific issues involved in the Boston Scientific actions overlap those in these actions. Although the Panel did not find that industry-wide centralization was appropriate in its June 5, 2026 Order, the challenges posed by industry-wide centralization, such as factual differences in each manufacturer's FDA approval process, the potential need for multiple discovery tracks, and concerns regarding protection of trade-secret and confidential information between competing

manufacturers, do not apply to the transfer of these cases in a separate MDL to the same District and before the same Judge. Judge Staton is an extremely well qualified jurist, and Movants have no doubt that she would be capable of handling all of the spinal cord stimulator actions if the proposed multidistrict litigation against Nevro was also transferred to her, as Movants request.[1]

I. BACKGROUND REGARDING LITIGATION STATUS AND SCOPE

a. Nevro's Spinal Cord Stimulator Systems

Nevro's spinal cord stimulators are implantable neuromodulation systems designed to deliver electrical impulses to the spinal cord to mask or moderate chronic and intractable pain. Nevro's HFX, Senza, and Omnia spinal cord stimulation systems include a rechargeable implantable pulse generator ("IPG") connected to percutaneous lead wires with electrodes implanted near the patient's spinal cord. The IPG has 16 output channels, each programmable as a cathode or an anode, and is powered by a 3.6 V nominal lithium-ion rechargeable battery. These systems are associated with complex risks, including but not limited to device malfunction, device migration, shocking or burning sensations, stimulation-induced neurological deficits, neurological injury, dysmotility, syncope, arrhythmias, bowel or bladder incontinence, dysphagia, ataxia, and lower-extremity weakness.

---

[1] If the Panel, however, is concerned with overburdening Judge Staton, in the alternative, Movants respectfully request that these cases be coordinated and transferred to either a different judge in the Central District of California or to the Northern District of California, where the transferee courts would find coordination between the various MDLs easier and where the MDL Court would continue to have personal jurisdiction over Nevro.

Nevro is a Delaware corporation with its principal executive offices at 1800 Bridge Parkway, Redwood City, California 94065. As of April, 2025, Nevro became a wholly owned subsidiary of Globus Medical, Inc., however, despite a technical shift in address for registration purposes, it appears that Nevro's actual headquarters remain in northern California. Given the location of its headquarters at all relevant times and that all of the development of the products at issue appear to have been done there, witnesses and documents most relevant to the challenged PMA submissions, supplement activity, and post-approval implementation decisions are most likely to be located in northern California.

Nevro's Senza Spinal Cord Stimulation System is a PMA-approved Class III spinal-cord stimulator regulated under PMA P130022, which FDA approved on May 8, 2015 for chronic intractable pain of the trunk and/or limbs, including pain associated with failed back surgery syndrome, intractable low back pain, and leg pain. FDA's risk discussions for Senza and its later supplements identify standard spinal cord stimulator system risks, which makes the PMA history and supplement record central to common factual and legal issues in any coordinated proceeding involving Nevro's spinal cord stimulator systems.

Movants allege that the later Nevro systems and supplements involved material changes from the original Senza device, including Bluetooth functionality for the trial stimulator and permanent IPG, remote adjustment or control features involving Nevro sales representatives, lead and performance specifications, and other performance parameters such as waveform, pulse shape, amplitude, output voltage, pulse width, frequency, and lead impedance. The movants further allege that one FDA performance requirement for the percutaneous leads was impedance under 18 Ohms, and that certain plaintiff-specific devices exceeded or failed to conform to applicable specifications.

Nevro submitted successive PMA supplements treating these major modifications as discrete "minor" changes to avoid the heightened scrutiny, public transparency, and rigorous independent clinical evaluation required for new PMA applications. This regulatory strategy deprived physicians, patients, and the FDA of the complete information necessary to evaluate the true risks associated with the modified devices, particularly in neurological safety, device longevity, stimulation safety, and autonomic complications. As a direct consequence of these omissions and regulatory manipulations, the spinal cord stimulator systems entered the market and were widely implanted without sufficient scientific validation of their safety and effectiveness. These allegations are asserted as product-liability, warranty, negligence, misrepresentation, consumer-protection, and related state-law causes of action.

b. Federal Regulatory and Parallel State-Law Claims

Spinal cord stimulator systems are regulated as Class III medical devices under the Federal Food, Drug, and Cosmetic Act ("FDCA"), 21 U.S.C. § 301 *et seq*., and the Medical Device Amendments of 1976 ("MDA"), 21 U.S.C. § 360c *et seq*. Class III devices are supposed to be subject to the most rigorous form of regulatory oversight, including the requirement to obtain Premarket Approval from the FDA prior to introducing such a medical device into interstate commerce. *See* 21 U.S.C. § 360e. To obtain PMA, a manufacturer is supposed to submit detailed information demonstrating the proposed device's safety and effectiveness, including clinical trial data, descriptions of manufacturing methods, proposed labeling, and a risk-benefit analysis. *See* 21 C.F.R. § 814.20.

Once a PMA is granted, any proposed changes to the device's design, labeling, intended use, or manufacturing process must be submitted to the FDA as a PMA supplement. *See* 21 C.F.R. § 814.39(a). For any change that could affect safety or effectiveness, the FDA must

receive and approve the PMA supplement before the manufacturer implements the change. 21 C.F.R. §814.39(c). The burden of proof remains with the manufacturer to demonstrate that the modified device remains safe and effective. These regulatory obligations are non-discretionary and enforceable under both federal and state law.

FDA's own records show that Nevro's Senza PMA family, now covering Senza, Senza Omnia, and HFX iQ, has not remained a static device since its original 2015 approval. Instead, Nevro has repeatedly expanded and modified that PMA through supplements adding new indications, a new HFX iQ hardware-and-software platform, app-based patient controls, component substitutions, supplier and manufacturing changes, and later printed-circuit-board and microcontroller modifications.

Movants argue that Nevro is not simply marketing the same device originally approved years ago, but a materially altered spinal cord stimulator family, and that PMA status should not insulate negligent post-approval design, validation, manufacturing, monitoring, and warning conduct directed to those significant changes. Nevro failed to comply with the foregoing regulatory requirements and that these federal violations support parallel state-law claims. In addition, Nevro failed to comply with PMA conditions, QSR/CGMP obligations, adverse-event reporting duties, labeling and warning obligations, and post-market surveillance duties.

c. Nevro Spinal Cord Stimulator Litigation

As of today's date, based on the counsel's research, there are seventeen (17) substantially similar cases pending against Nevro in six (6) different federal court jurisdictions. Nine (9) of these cases also name the FDA as a defendant pursuant to the APA. In addition to these federal court actions for which coordination is requested, there are several state court Nevro filings, primarily in Pennsylvania. Each of these actions alleges injury caused by a Nevro spinal cord

stimulator system and asserts overlapping theories including manufacturing or product defect, failure to warn, negligence, breach of implied and/or express warranties, fraudulent or negligent misrepresentation, and state unfair-trade or consumer-protection claims. In addition, Nevro has entered into a tolling agreement with at least Movant's counsel which runs through August 1, 2026, which has impacted the number of filings as of the date of this motion, but which will result in a significant number of additional filings once it expires.

d. Many More Claims Anticipated

The currently identified cases represent only a small franction of the cases that may be filed against Nevro. While Movants do not know the exact number of Nevro spinal cord stimulator systems sold, the overall spinal cord stimulator market is large. An estimated 50,000 spinal cord stimulators are implanted annually. See Sdrulla AD, Guan Y, Raja SN. Spinal Cord Stimulation: Clinical Efficacy and Potential Mechanisms. Pain Pract. 2018 Nov;18(8):1048-1067. doi: 10.1111/papr.12692. Epub 2018 Apr 23. PMID: 29526043; PMCID: PMC6391880. In September 2020, in response to a Public Citizen report, the FDA issued a letter to healthcare providers advising that, during the preceding four-year period, it had received 107,728 adverse event reports regarding spinal cord stimulators. The letter also disclosed 30,321 reports of unsatisfactory pain relief. In fact, Nevro has not made any substantial safety or efficacy improvements to its spinal cord stimulators. Nevro's own FDA PMA materials reflect meaningful device-risk issues across the original approval and later PMA supplements. Those same FDA summaries continue to identify infection, impaired wound healing or wound dehiscence, ineffective therapy, revision, and explant as recognized risks for the Senza, Senza II, and Senza Omnia systems. Based on this adverse event reporting disclosed by the FDA, there are likely tens of thousands of patients with potential claims involving spinal cord stimulation

devices against Nevro. Just Movant's law firm alone represents over 300 individuals who were injured by an Nevro spinal cord stimulator system and whose cases are being evaluated for further prosecution and filing.

II. ARGUMENT

Title 28, Section 1407 of the United States Code provides: "When civil actions involving one or more common questions of fact are pending in different districts, such actions may be transferred to any district for coordinated or consolidated pretrial proceedings." 28 U.S.C. § 1407(a). The presence of common factual questions necessitates transfer under § 1407 in order to prevent duplication of discovery and eliminate the possibility of inconsistent pretrial rulings. *In re Eastern Airlines, Inc. Flight Attendant Weight Program Litig.*, 391 F. Supp. 763, 764 (J.P.M.L. 1975). Transfer under § 1407, however, does not require complete identity or even majority of common factual or legal issues as a prerequisite to transfer. *In re Rembrandt Techs., L.P.*, 493 F. Supp. 2d 1367, 1369 (J.P.M.L. 2007); *In re Phenylpropanolamine (PPA) Prods. Liab. Litig.*, 173 F. Supp. 2d 1377, 1379 (J.P.M.L. 2001).

a. Movants' Claims Involve Common Questions of Law and Fact against the Same Defendants

Movants here similarly assert that they suffered injuries and damages as a result of being implanted with a spinal cord stimulator manufactured and marketed by Nevro. As the Panel already found with Boston Scientific, similarly here questions common to the identified Nevro suits arise from the underlying facts and course of conduct alleged in each complaint. While the Panel has already addressed many of the arguments that are made below, as well as arguments that may be raised in opposition to centralization, in the context of its decision regarding Boston Scientific, the arguments are nonetheless made below for completeness. *See* Order dated June 5,

2026, *In re Boston Scientific Corporation Spinal Cord Stimulator Products Liability Litigation*, MDL No. 3181 (Dk. No. 76).

Similar to the actions in MDL No. 3181, the Nevro cases share common issues relating to the design, manufacture, sale, testing, marketing, advertising, promotion, programming, post-market monitoring, and/or distribution of Nevro spinal cord stimulator systems. Such common questions, many of which directly influence Nevro's defenses and ultimate liability, include:

1) Whether the spinal cord stimulators materially deviated from their intended design specifications and from applicable federal requirements governing Class III medical devices;
2) Whether Nevro failed to warn and/or adequately warn consumers and physicians about the known risks of its spinal cord stimulator systems;
3) Whether Nevro breached its duty to comply with federal medical device regulations in the design, manufacture, sale, and post-market monitoring of its spinal cord stimulator systems;
4) Whether Nevro intentionally, deliberately, knowingly, carelessly, recklessly, or negligently misrepresented, omitted, concealed, or suppressed material and important information regarding the true and known risks, benefits, sales-representative involvement, and regulatory status of its spinal cord stimulator systems from physicians and patients;
5) Whether Nevro's conduct, and the conduct of its sales representatives, in marketing, promoting, recommending, programming, reprogramming, and advising on the use of its spinal cord stimulator systems constituted the practice of medicine without a license and, therefore, negligence or negligence per se;

6) Whether Nevro's and/or Globus's alleged misconduct constitutes a breach of any warranty or warranties recognized by law;

7) Whether Nevro's and/or Globus's alleged misconduct constitutes a violation of any applicable consumer protection and/or fair trade practices laws.

Additionally, Movants and the plaintiffs in the related cases allege injury by Nevro spinal cord stimulators marketed under the Senza PMA and/or PMA supplements. As such, while there may be differences among the specific models, including HFX Senza and HFX Omnia, the actions share core regulatory and product-history questions. As such, while there are differences among the specific models due to changes made by Nevro through the PMA supplement process, the regulatory history of each model is the same.

Finally, the identified plaintiffs allege overlapping categories of injury caused by Nevro spinal cord stimulators. These injuries include unsatisfactory pain relief, shocking or burning sensations, overstimulation, pain, syncope, vertigo, bowel or bladder incontinence, dysphagia, arrhythmias, ataxia, lower-extremity weakness, neurological injury, spinal dysfunction, and loss of mobility. All of these injuries, however, can be grouped into three underlying causes: 1) physical injuries caused by the electrical impulses acting on the nerves resulting in various specific injuries based upon the specific nerves affected (shocks, incontinence, lower extremity weakness, etc.); 2) physical injuries caused by defective leads (e.g. burning, lead migration); and 3) failure of the device to provide pain relief. The transferee judge can adequately address any differences between products or plaintiff-specific injuries through specific discovery and motion tracks, if needed. *See*, *e.g.*, *In re Social Media Adolescent Addiction/Personal Injury Prods. Liab. Litig.*, 637 F. Supp. 3d 1377, 1378 (J.P.M.L. 2022).

Transfer is therefore appropriate and necessary given the significant number of common questions of law and fact present in this litigation.

b. Coordination Serves the Best Economic and Equitable Interests of the Parties, Counsel, and Judiciary

Coordinated pretrial proceedings conserve the time, effort, and financial resources of the judiciary and the parties, while simultaneously eliminating the possibility of inconsistent rulings from sister courts in parallel proceedings that might impair the equitable and orderly administration of justice. *See*, *e.g., In re Pradaxa (Dabigatran Etexilate) Prods. Liab. Litig*., 883 F. Supp. 2d 1355, 1356 (J.P.M.L. 2012) ("Centralization will eliminate duplicative discovery; prevent inconsistent pretrial rulings; and conserve the resources of the parties, their counsel and the judiciary"); *In re DePuy Orthopaedics, Inc*., 753 F. Supp. 2d 1378, 1379 (J.P.M.L. 2010) ("Centralization under Section 1407 will eliminate duplicate discovery, prevent inconsistent trial rulings on discovery and other issues, and conserve the resources of the parties, their counsel and the judiciary").

Coordination of these actions serves the best interests of the parties, parties' counsel, and the judiciary by conserving economic resources and preventing inconsistent rulings. Unless Movants' claims are coordinated, the parties and courts will be forced to spend a great deal of time, effort, and money litigating common issues of both fact and law. Furthermore, the parties may be prejudiced by various courts entering contradictory rulings on discovery, evidentiary, and legal issues common to all claims. Such disparate rulings will lead to more litigation and, ultimately, to incongruous results and bad precedent.

Of particular significance here, the threshold federal issues presented by the Nevro actions arise from a common PMA lineage and are best resolved in a coordinated proceeding.

Nevro's Senza spinal cord stimulator family proceeds under PMA P130022, originally approved in 2015, with later panel-track supplements adding indications for painful diabetic neuropathy and non-surgical refractory back pain, and a later design-and-components supplement approving the HFX iQ system; Senza Omnia remains within that same PMA family. The recurring issues across these actions therefore will turn on the same device-specific federal record, including the scope of any preemption defense, whether Plaintiffs' state-law claims parallel rather than add to Nevro's PMA and supplement obligations, and what Nevro's own submissions, labeling, warnings, and post-approval duties required as Nevro introduced new indications and materially changed product configurations. Nevro's own FDA records also reflect recognized risks and substantial adverse-event experience, including infection, wound complications, ineffective pain control, revision, and explant, confirming that coordinated treatment of these Nevro-specific threshold issues will promote efficiency and reduce the risk of inconsistent rulings.

In addition to the traditional product liability claims discussed above, the underlying complaints also allege additional causes of action related to company-wide deceptive sales practices, the unauthorized practice of medicine by the company's sales representatives, and other fraud and negligence related claims, which apply company-wide regardless of the specific implanted device.

Piecemeal litigation of these issues may yield inconsistent rulings across jurisdictions, with multiple appeals and potentially different outcomes. In contrast, coordination avoids the pitfalls of piecemeal litigation by resolving disputes arising from each of these common issues in a single ruling. *See In re StarLink Corn Prods. Liab. Lit.,* 152 F.Supp.2d 1378, 1380 (J.P.M.L. 2001); *see also In re Cartiva Synthetic Cartilage Implant Prods. Liab. Litig.*, 2026 U.S. Dist. LEXIS 26709 *2-3 (J.P.M.L. 2026).

The need for coordination is underscored by the current procedural record. Movants' cases, along with the related cases, are well-suited for coordination currently. The risk of disparate rulings is real and imminent, as seen recently in similar cases filed against Boston Scientific and Nevro. Specifically, the District of Maryland recently denied Nevro's motion to dismiss in a spinal cord stimulator case, while the Western District of Michigan granted Boston Scientific's motion to dismiss in a similar, though differently pleaded case. *Compare Mark Dunham v. Boston Scientific Corp.*, 1:25-cv-00481 (W.D. Mich.) (granting motion to dismiss) with *Perry DiToto v. Nevro Corp.*, *et al*., 1:25-cv-01388-RDB (D. Md.) (denying motion to dismiss on all claims except implied warranty). This risk increases with each passing month, as plaintiffs file more cases in different jurisdictions and motion practice progresses in the cases already filed. Further, the parties have not completed significant discovery workup in any case. As such, there is no risk of wasting significant past litigation work.

Coordination will also prevent costly and inefficient duplication of discovery efforts, benefiting all parties. In the absence of Section 1407 coordination, it may be necessary for Nevro, Globus where named, and related employees and witnesses to be deposed multiple times. Further, defendants may respond to multiple different sets of discovery requests from different plaintiffs' counsel. On the other hand, if the cases are coordinated, the parties can work together and with the transferee court to prevent duplication of discovery, thereby preventing waste of time and resources by all parties and the judiciary.

Finally, informal coordination of these actions pursuant to 28 U.S.C. § 1404 is not preferable to § 1407 centralization. Multiple different attorneys represent the plaintiffs in the related cases, and Counsel anticipates that additional attorneys will file cases as the litigation progresses, complicating informal coordination. Further, while § 1407 transfer is for pretrial

proceedings only, § 1404 transfer requires a plaintiff to fully commit to the transferee venue. For many reasons, some plaintiffs may not be able or willing to commit the entire litigation of their case, including trial, to a venue outside their home state.

Therefore, Section 1407 coordination is necessary to avoid disparate rulings from district courts across the country, unnecessary and duplicative work for the judiciary, and inefficient litigation of these cases.

c. The Central District of California is an Ideal Transferee Forum

In determining the appropriate venue to transfer an MDL, the Panel may balance a number of factors, (1) the location of parties, witnesses, and documents; (2) the accessibility of the proposed transferee district to parties and witnesses; and (3) the respective caseloads of the proposed transferee district courts. *See In re Corn Derivatives Antitrust Litig.*, 486 F. Supp. 929, 931–32 (J.P.M.L. 1980) (discussing factors); *see also* Manual for Complex Litigation (Fourth), § 20.131, pp. 220–21. As an additional factor, the Panel also considers "assigning th[e] docket to a seasoned jurist who has the experience and caseload conditions to steer th[e] litigation on a prudent course.' *In re Bank of Am. Corp. Auction Rate Sec. (ARS) Mkgt. Litig.*, 598 F. Supp.2d 1377, 1379 (Jud. Panel Mult. Litig. 2009). Each factor weighs in favor of transfer to the Central District of California as compared to the venues proposed.

Most importantly, Defendant Nevro Corporation maintains its headquarters related to the spinal cord stimulators in Redwood City, California. While Nevro is thus located in the Northern District of California, much of the same advantages that come from transfer to the Northern District of California are equally applicable to the Central District of California. For example, personal jurisdiction is also available against Nevro in the Central District of California, not just the Northern District, which eliminates one of the issues with selecting cases for bellwether trials by eliminating the need for defendants to waive their rights under *Lexecon Inc. v. Milberg Weiss*

Bershad Hynes & Lerach, 523 US 26 (1998). In addition, the MDL Court would likely be able to compel the appearance of Nevro company witnesses at trial, streamlining testimony and eliminating the need to rule on and play lengthy depositions. While § 1407 transfer is not intended for trial, bellwether trials are a valuable tool in the MDL Court's toolbox, and can strongly push multidistrict litigation towards global resolution. See Manual for Complex Litigation, Fourth, §20.132.

The remaining factors were already implicitly found in favor of transfer to the Central District of California when the Panel coordinated and transferred the Boston Scientific spinal cord stimulator cases there. The Panel recently transferred spinal cord stimulator cases pending against Boston Scientific to Judge Josephine Staton in the Central District of California. *In re Boston Scientific Corporation Spinal Cord Stimulator Products Liability Litigation*, MDL No. 3181 (Dk. No. 76), June 5, 2026. While the JPML's transfer order in MDL No. 3181 declined to create an industry-wide MDL, it did not foreclose the transfer of additional manufacturer-specific MDL to Judge Staton. There are significant similarities between the Nevro and Boston Scientific spinal cord stimulator cases, including overlapping expert issues, regulatory issues, preemption defenses, device-risk evidence, and sales-and-marketing allegations. Transfer of the Nevro cases to Judge Staton would allow one judge to handle common background work involved in addressing these issues, rather than requiring multiple judges to address similar issues, thereby promoting judicial economy.

Finally, Judge Staton is an extremely well qualified jurist with experience overseeing a complex cases and transfer of these cases to her Court would allow for significant efficiencies, even without consolidating multiple-manufacturers into a single MDL. Thus, centralization in the Central District of California would align this litigation with the Panel's recent handling of spinal

cord stimulator product-liability issues and reduce duplicative work for courts and counsel. Transferring the Nevro actions to a different court will unnecessarily burden plaintiffs' counsel with litigation in two different courts. While it is possible that Nevro and Boston Scientific may prefer this outcome, it does not increase the "convenience of parties and witnesses" nor "promote the just and efficient conduct" of these actions. *See* 28 U.S.C. § 1407. This is especially true where much of the work required of plaintiffs' counsel in these MDLs will be the same or similar, regardless of the specific manufacturer involved. Therefore, under the Section 1407 criteria, the Central District of California is the best location for coordination of these actions.

III. CONCLUSION

Movants respectfully move this Panel, pursuant to 28 U.S.C. § 1407 and Rule 6.2 of the Rules of Procedure of the United States Judicial Panel on Multidistrict Litigation, for an order transferring all related Nevro Spinal Cord Stimulator Product Liability cases to the Central District of California for coordinated and/or consolidated proceedings.

Dated: June 26, 2026

Respectfully submitted,

/s/ Behram V. Parekh

Behram V. Parekh
Wisner Baum LLP
11111 Santa Monica Boulevard, Suite 1750
Los Angeles, CA 90025
(310) 820-6259
bparekh@wisnerbaum.com

Counsel for Plaintiffs Clay, Gooding, Hawken, Lutke, Manley, Mounteer, Ramirez, and Tripp