

# EXHIBIT 1

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**Subject:** RE: In re aflibercept - May 10 submission m/c  
**Date:** Tuesday, May 21, 2024 8:16:43 AM  
**Attachments:** [image006.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[Draft Joint Proposed Order re Redacted Versions of Sealed Filings and Confidential Discovery Materials.docx](#)

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Counsel,

During the scheduling conference on Friday, the Court recognized “frustration with access to documents” and acknowledged a need for a procedure for providing the parties access to redacted versions of documents in all cases consolidated in this MDL proceeding.

To that end, we have prepared a proposal that details a procedure for the filing of redacted versions of documents on the public record, and the exchange of litigation documents amongst the parties, including documents served on the parties but not filed with the Court. A copy of the proposal is attached to this email.

We believe that it is in the best interest of all the parties and the public to reach an agreement on these access issues. We welcome any comments or proposed revisions from the parties by **May 28, 2024**. To the extent that the parties are unable to reach an agreement by that date, Amgen intends to move the Court for an order addressing the issues raised in the attached proposal.

Best regards,  
Brett



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