

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
3:22-MD-03036-KDB**

**IN RE: GARDASIL PRODUCTS LIABILITY  
LITIGATION**

**MDL No. 3036**

**THIS DOCUMENT RELATES TO  
ALL BELLWETHER CASES**

**MERCK’S MOTION FOR SUMMARY JUDGMENT  
BASED ON IMPLIED PREEMPTION**  
Fed R. Civ. P. 56, Local Civ. R. 7.1

Defendants Merck & Co., Inc. and Merck, Sharp & Dohme LLC (together, “Merck”) move for summary judgment on the ground of implied preemption as to all claims in all sixteen bellwether cases for the reasons explained in its supporting brief.

WHEREFORE, Merck requests that this Court enter an Order granting summary judgment in its favor as to all claims in all sixteen bellwether cases and award Merck such other relief as the Court deems just and proper.

This the 1st day of November, 2024.

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