

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

IN RE: VALSARTAN N-  
NITROSODIMETHYLAMINE (NDMA),  
LOSARTAN, and IRBESARTAN PRODUCTS  
LIABILITY LITIGATION

Civil No. 19-2875 (RBK/JS)

**CASE MANAGEMENT ORDER NO. 22**

The Court having held a status conference via phone with counsel on November 24, 2020; and this Order intending to confirm the various rulings made by the Court; and accordingly,

It is hereby ORDERED this 25th day of November 2020, as follows:

- 1) No personal jurisdiction motions may be filed without leave of court.
- 2) No summary judgment motions may be filed without leave of court.
- 3) No amended complaints shall be filed without leave of court to be requested in a Motion to Amend.
- 4) All requests to vacate dismissals entered on account of the Order to Show Cause process shall be made via a formal motion.
- 5) The following scheduling deadlines shall be in effect:
  - **April 1, 2021** - Deadline to complete fact discovery on all issues including general causation and class certification.
  - **May 3, 2021** - Deadline for plaintiffs to serve their expert reports addressing general causation with dates the experts are available to be deposed.

- **June 1, 2021** - Deadline to complete depositions of plaintiffs' general causation experts.
  - **July 1, 2021** - Deadline for defendants to serve their expert reports addressing general causation with dates the experts are available to be deposed.
  - **August 2, 2021** - Deadline to complete depositions of defendants' general causation experts.
  - **August 31, 2021** - Deadline to file Daubert motions.
  - **October 1, 2021** - Deadline to file responses to Daubert motions.
  - **November 1, 2021** - Deadline to file replies to responses to Daubert motions.
- 6) By **December 2, 2020**, plaintiffs shall serve the final versions of their Fed.R.Civ.P.30(b)(6) deposition notices (dates blank) which will be approved in a Court Order.
- 7) All disputes regarding the parties' Deposition Addendums shall be put on the agenda for the **December 9, 2020** conference call.
- 8) By **December 8, 2020** the parties shall complete fulsome discussions regarding the names, dates, and locations of depositions to be taken starting on January 19, 2021.
- 9) By **December 23, 2020**, defendants are granted leave to file a motion to compel/protective order regarding all deposition issues not resolved by that date.
- 10) By **December 31, 2020** plaintiffs' shall disclose the types of cancer for which they will provide expert reports to proceed to the general causation Daubert hearing in the MDL; plaintiffs may amend these disclosures upon a showing of good cause. The parties shall meet and confer about the format of these disclosures.

s/ Robert B. Kugler  
ROBERT B. KUGLER  
United States District Judge

