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FILED
ALAMEDA COUNTY

JUN 21 2022

CLERK OF THE SUPERIOR COURT

By [Signature] Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ALAMEDA

COORDINATION PROCEEDING
SPECIAL TITLE (RULE 3.550)

JCCP NO. 5150

RANITIDINE PRODUCTS CASES

~~[PROPOSED]~~
**SECOND AMENDED PRETRIAL
ORDER NO. 4**

THIS DOCUMENT RELATES TO:

ALL CASES

**CASE SCHEDULING,
BELLWETHER TRIAL CASE
SELECTION, AND DISCOVERY
ORDER**

1 THIS ORDER shall govern all cases being litigated as part of Judicial Council
2 Coordinated Proceeding No. 5150, *Ranitidine Products Cases* (“JCCP 5150”), whether by an
3 original filing, coordination, or transfer to this Court. Pursuant to Rules 3.540 and 3.541 of the
4 California Rules of Court (“CRC”), having considered the written submissions of the parties and
5 good cause appearing,

6 **IT IS HEREBY ORDERED:**

7 1. All provisions of Pretrial Order No. 4 (“PTO 4”) and Amended Pretrial Order No.
8 4 not amended by this Order remain in full force and effect.

9 2. Pursuant to this Court’s authority under California Code of Civil Procedure
10 (“CCP”) § 404.7, CRC 3.400, CRC, 3.504, CRC 3.540, and CRC 3.541, and to promote the ends
11 of justice and the efficient utilization of court and party resources in this coordinated proceeding,
12 this Court further amends Pretrial Order No. 4 to modify the pretrial and trial schedule for the
13 first four bellwether trial settings and adopt certain discovery provisions. This Order is intended
14 to further the goals of a fair and representative bellwether trial case selection process and an
15 orderly and efficient schedule in this coordinated proceeding. It is not designed to create
16 advantages for any party. All parties reserve the right to address any activities inconsistent with
17 these stated goals with the Court at any time.

18 3. **Amended Schedule for First Four Bellwether Trials.** The first four bellwether
19 trial settings shall proceed pursuant to the following amended schedule, which shall supersede the
20 schedule and deadlines set forth in Paragraphs 8, 10, and 11-15 of PTO 4 and Paragraph 3 of
21 Amended PTO 4.

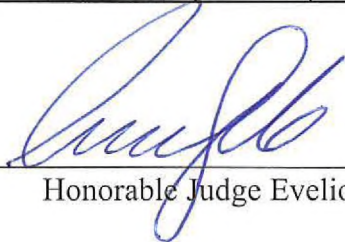
ACTION/DEADLINE	DATE
Deadline for depositions of medical causation-related healthcare providers in four bellwether trial cases selected pursuant to PTO 4 (“bellwether trial cases”) (PTO 4, para. 8) ¹	June 20, 2022
Plaintiffs’ expert disclosures due in four bellwether trial cases, with at least two proposed deposition dates for each expert (PTO 4, para. 10a)	July 15, 2022
Defendants’ expert disclosures due in four bellwether trial cases, with at least two proposed deposition dates for each expert (PTO 4, para. 10a)	August 26, 2022
Deadline for Plaintiffs’ rebuttal expert disclosures, which shall be strictly limited to opinions that contradict or rebut opinions on the same matter offered by a Defendant’s expert, along with at least two proposed deposition dates for any rebuttal expert (PTO 4, para. 10a)	September 12, 2022
Plaintiffs’ experts’ depositions completed (Plaintiffs’ experts to be deposed first) (PTO 4, para. 10a)	October 7, 2022
Defendants’ experts’ depositions completed (PTO 4, para. 10a)	November 15, 2022
<i>Sargon</i> motions to exclude expert testimony and dispositive motions due in four bellwether trial cases (PTO 4, para. 11)	November 18, 2022
Parties to jointly submit a proposed schedule for motions <i>in limine</i> , jury instructions, jury questionnaires, exhibit lists, witness lists, deposition designations and objections, trial briefs, etc. for first bellwether trial (Local Rule 3.35) (Amended PTO 4, para. 3a)	December 12, 2022
Oppositions to <i>Sargon</i> and dispositive motions due (PTO 4, para. 11)	December 16, 2022
Deadline for fact discovery in first bellwether trial case (PTO 4, para. 8)	December 30, 2022
Replies in support of <i>Sargon</i> and dispositive motions due (PTO 4, para. 11)	January 5, 2023
Court hearing on <i>Sargon</i> and dispositive motions (PTO 4, para 11)	January 25, 2023
Final pretrial conference for first bellwether trial (Amended PTO 4, para. 3a)	February 3, 2023
First bellwether trial begins (Amended PTO 4, para. 3a)	February 13, 2023
Parties to jointly submit a proposed schedule for motions <i>in limine</i> , jury instructions, jury questionnaires, exhibit lists, witness lists, deposition designations and objections, trial briefs, etc. for second bellwether trial (Local Rule 3.35) (Amended PTO 4, para. 3b)	March 20, 2023
Final pretrial conference for second bellwether trial (Amended PTO 4, para. 3b)	April 28, 2023

¹ The parties agree that this deadline does not affect a party’s right to take the deposition before trial of any trial witness, including a healthcare provider, identified by a party if not yet deposed. This deadline also does not affect a party’s right to depose a newly identified healthcare provider.

1	Second bellwether trial begins (Amended PTO 4, para.3b)	May 1, 2023
2	Parties to jointly submit a proposed schedule for motions <i>in limine</i> , jury instructions, jury questionnaires, exhibit lists, witness lists, deposition designations and objections, trial briefs, etc. for third bellwether trial (Local Rule 3.35) (Amended PTO 4, para. 3c)	May 22, 2023
3		
4	Final pretrial conference for third bellwether trial (Amended PTO 4, para. 3c)	August 4, 2023
5	Third bellwether trial begins (Amended PTO 4, para. 3c)	August 7, 2023
6	Parties to jointly submit a proposed schedule for motions <i>in limine</i> , jury instructions, jury questionnaires, exhibit lists, witness lists, deposition designations and objections, trial briefs, etc. for fourth bellwether trial (Local Rule 3.35) (Amended PTO 4, para. 3d)	September 11, 2023
7		
8	Final pretrial conference for fourth bellwether trial (Amended PTO 4, para. 3d)	October 20, 2023
9		
10	Fourth bellwether trial begins (Amended PTO 4, para. 3d)	October 23, 2023

11 **IT IS SO ORDERED.**

12 Dated: June 21, 2023

13 
 14 _____
 15 Honorable Judge Evelio M. Grillo

Superior Court of California, County of Alameda
Department 21, Administration Building

Case Number: JCCP005150
Case Name: Ranitidine Product Cases

RE: SECOND AMENDED PRETRIAL ORDER NO.4 – CASE SCHEDULING,
BELLWETHER TRIAL CASE SELECTION, AND DISCOVERY ORDER

DECLARATION OF ELECTRONIC SERVICE

I certify that I am not a party to these cases and that a true and correct copy of the foregoing document was served electronically pursuant to Pre-Trial Order No. 8, entered in these coordinated proceedings on September 23, 2021 via the CASE ANYWHERE system. Execution of this certificate occurred at 1221 Oak Street, Oakland, California.

Executed on June 22, 2022

Executive Officer/Clerk of the Superior Court

By Christopher Wright
Deputy Clerk



35058351

DOCUMENT: Second Amended Pre-Trial Order No. 4- Case Scheduling Bellwether Trial Case Selection, and Discovery Order (ORD010)
CASE: 21CV002163

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FILED: 06/21/2022

FILED BY:

BARCODE BY: cwright 06/21/2022 2:29 PM

ENTERED BY: cwright 06/21/2022 2:29 PM