

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP,)	
BI-LEVEL PAP, AND MECHANICAL)	Master Docket: Misc. No. 21-1230
VENTILATOR PRODUCTS)	
LITIGATION,)	MDL No. 3014
)	
This Document Relates to: All Actions)	

JOINT NOTICE OF UPDATED TIMELINE OF PERTINENT MDL DATES

The parties jointly submit this updated timeline of upcoming deadlines in *In Re: Philips Recalled CPAP, Bi-Level PAP, and Mechanical Ventilator Products Litigations* (MDL No. 3014).¹

Date	Event	ECF No.
1/31/2023 ²	Deadline for Personal Jurisdiction Discovery re: KPNV	12/22 Status Conf. Tr.
2/6/2023	Deadline for Plaintiffs to oppose all motions to dismiss the Consolidated Third Amended Class Action Complaint for Economic Losses (ECF 901, 911, 915, 917) except for the motion to dismiss for lack of personal jurisdiction (ECF 913) (deadline to oppose yet to be determined)	768, 950
3/7/2023	Deadline for Plaintiffs to oppose the motions to dismiss the Consolidated Second Amended Class Action Complaint for Medical Monitoring	967
3/7/2023	Deadline for Plaintiffs to oppose the motions to dismiss the Amended Master Long Form Complaint for Personal Injuries and Damages	967
3/21/2023	Deadline for Defendants to file replies in support of their motions to dismiss the Consolidated Third Amended Class Action Complaint for Economic Losses	768, 950
4/21/2023	Deadline for Defendants to file replies in support of their motions to dismiss the Consolidated Second Amended Class Action Complaint for Medical Monitoring	967

¹ The Parties intend this notice to be a reference resource for the Court. The Parties do not intend this notice and the summaries of the deadlines to supersede the terms in the Court's orders.

² By mutual agreement, the Parties have scheduled the Rule 30(b)(6) deposition of KPNV to occur on February 1, 2023, and at the conference will request the Court's leave to allow the deposition to occur on that date.

Date	Event	ECF No.
4/21/2023	Deadline for Defendants to file replies in support of their motions to dismiss the Amended Master Long Form Complaint for Personal Injuries and Damages	967
4/28/2023	Deadline for any Plaintiffs' Motions to Remand to State Court	701
6/28/2023	Deadline to file Defendants' Responses to any Motions to Remand to State Court (or Consolidated Response, if determined to be more efficient and effective)	701
7/28/2023	Deadline to file Plaintiffs' Replies in support of any Motions to Remand to State Court	701

Pursuant to Pretrial Order #28 (ECF No. 783), the following procedures and deadlines apply to the Amended Master Personal Injury Complaint and Individual Short Form Personal Injury Complaints.

Date	Event
Within sixty (60) days of the date on which the Court issues a ruling as to its motion to dismiss the Amended Master Personal Injury Complaint ³	Deadline for Defendant to file a Master Answer to the Amended Master Personal Injury Complaint.
Within forty-five (45) days of the date on which the Court issues a ruling granting Plaintiffs' Co-Lead Counsel leave to amend the Amended Master Personal Injury Complaint	Deadline for Plaintiffs' Co-Lead Counsel to file a Second Amended Master Personal Injury Complaint
Within fourteen (14) days of filing a Short Form Complaint	Deadline for Personal Injury Plaintiffs to upload their Short Form Complaint to the online MDL Centrality System accessible at www.mdlcentrality.com/ pursuant to Pretrial Order # 27
Within twenty-one (21) days after service of the Master Answers to the Amended Master Personal Injury Complaint by Defendants	Deadline for any Personal Injury Plaintiff, who has filed a Short Form Complaint, to amend the same for any reason
Within twenty-one (21) days after service of Short Form Complaint	Deadline for any Personal Injury Plaintiff, who files a Short Form Complaint after the filing of the Master Answers to the Amended Master Personal Injury Complaint, to amend the same for any reason

³ If a motion to dismiss the Amended Master Personal Injury Complaint does not result in the dismissal of the Amended Master Personal Injury Complaint in its entirety, and provided that the Court does not grant leave to amend the Amended Master Personal Injury Complaint.

Within twenty-one (21) days after selection for inclusion in the pool from which bellwether cases are to be selected	Deadline for any Personal Injury Plaintiff, whose case is subsequently chosen for inclusion in the pool from which bellwether cases are to be selected, to amend his or her Short Form Complaint
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Date: January 23, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed via the Court's CM/ECF system on this 23rd day of January 2023 and is available for download by all counsel of record.

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