

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

<i>In re: Suboxone (Buprenorphine/ Naloxone) Film Products Liability Litigation</i>	Case No. 1:24-md-03092-JPC MDL No. 3092
This document relates to: All Actions	Hon. J. Philip Calabrese
DEFENDANT INDIVIOR INC.'S SUPPLEMENT TO PROPOSAL FOR PHASED DISCOVERY ON GENERAL CAUSATION	

Indivior Inc. (“Indivior”) files this Supplement to Proposal for Phased Discovery on General Causation and in support thereof shows as follows:

At the April 16, 2024 case management conference, the Court discussed the possibility of including some plaintiffs in this proposal to provide context for the general causation determination. Indivior is agreeable to a process where the Court randomly selects three to five plaintiffs to be included in the general causation phased discovery. The plaintiffs would then produce the pharmacy, medical and dental records of these randomly selected plaintiffs that the experts would evaluate in the course of developing their general causation opinions. The medical records of the randomly selected plaintiffs would be redacted and the identity of these plaintiffs not revealed in briefing or on the record. All other case-specific issues for these randomly selected plaintiffs would be deferred to later case-specific workup, if necessary.

Should the Court order discovery to be phased with general causation discovery proceeding first, Indivior will withdraw its proposal that plaintiffs supply Plaintiff Profile Forms (“PPFs”) during that phased discovery. Indivior would instead immediately seek production of PPFs following conclusion of the general causation phase, if necessary.

Indivior attaches as Exhibit 1 (Dkt. No. 65-1) its ‘Parameters of Proposed Discovery’ on general causation and as Exhibit 2 (Dkt. No. 65-2) its ‘Scheduling Proposal for General Causation Discovery.’

Dated: April 23, 2024

Respectfully submitted,

BOWMAN AND BROOKE LLP

By: /s/ Randall L. Christian
Randall L. Christian

2901 Via Fortuna Drive, Suite 500
Austin, Texas 78746
Tel: (512) 874-3811
Fax: (512) 874-3801
Randall.Christian@bowmanandbrooke.com

Denise A. Dickerson
SUTTER O’CONNELL
3600 Erieview Tower
1301 East 9th Street
Cleveland, Ohio 44114
Tel: (216) 928-2200
Fax: (216) 928-4400
ddickerson@sutter-law.com

Attorneys for Defendant Indivior Inc.

CERTIFICATE OF SERVICE

Per Appendix B, ¶ 14 of the Northern District of Ohio's Electronic Filing Policies and Procedures Manual, I hereby certify that on April 23, 2024, the foregoing *Defendant Indivior Inc.'s Supplement to Proposal for Phased Discovery on General Causation* was electronically filed with the Clerk of Court using the CM/ECF system, and notice of this filing will be electronically transmitted to all counsel of record by operation of the Court's electronic filing system.

/s/ Randall L. Christian

Randall L. Christian