

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

IN RE SUBOXONE	)	Case No. 1:24-md-03092-JPC
(BUPRENORPHINE/NALOXONE)	)	
FILM PRODUCTS LIABILITY	)	MDL 3092
LITIGATION	)	
	)	Judge J. Philip Calabrese
This Document Applies to All Cases	)	

JOINT AGENDA FOR APRIL 17, 2025 CASE-MANAGEMENT CONFERENCE

Counsel have conferred and respectfully propose the following topics for discussion at the remote conference:

1. Non-compliance with records requests to healthcare providers
2. Plaintiff-centered Discovery
 - a. Census Protocol
 - i. Update on process to date
 1. Revised Schedule A submitted on April 14
 2. Census forms completed
 - b. Bellwether Protocol
 - i. Record Collection Pool platform development
 - ii. Order identifying the Records Collection Plaintiffs
 - iii. Parties are working on the Core Discovery and Trial Pool aspects and anticipate submitting proposed language before the May CMC
3. Defendant-centered Discovery
 - a. 30(b)(6) notices
 - i. Parties have met and conferred on the notices and are working cooperatively to reach agreement. No disputes for the Court to adjudicate at this time.

- b. Sublocade regulatory file
 - i. Agreement reached that defense will produce full Sublocade regulatory file and PLC will withdraw its request for the search term “inject*”
- 4. Newly filed cases
 - a. Update on filing status and joinder complaint process

Dated: April 14, 2025

Respectfully submitted,

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