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June 23, 2025

VIA ECF

Honorable Michael A. Shipp, U.S.D.J
United States District Court for the District of NJ
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

Re: *In re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices, and Products Liability Litigation*
Case No.: 3:16-md-02738-MAS-RLS

Dear Judge Shipp:

As discussed at last week's hearing, Defendants are focused on efficiently and expeditiously moving through this docket—now the largest MDL in the country. The primary method to accomplish that goal is twofold: (1) addressing claims that should not be on the docket;¹ and (2) completing the necessary gatekeeping work that will set the meets and bounds of trial, if one remains necessary, so the parties can move quickly to pretrial filings (motions *in limine*, deposition designations, exhibit lists, etc.).

Defendants believe that this Court's proposal to appoint Chief Judge Wolfson (ret.) as a special master to address the Rule 702 motions is an excellent solution to the second need, and Defendants agree to that appointment.

Defendants are eager to meet with Judge Wolfson and share our views on a format that will be beneficial not just for the MDL cases, but the New Jersey state MCL cases as well.

¹ Both sides agree that thousands of gynecological cancer claims are on the docket that are not compensable. Defendants have proposed a *Lone Pine* procedure so that these claims can be dismissed. Plaintiffs have proposed a census. That issue is currently before Judge Schneider.

June 23, 2025

Page 2

Respectfully submitted,

/s/ Jessica L. Brennan

cc: All Counsel of Record (via ECF)