

**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 JULY 14, 2025 CASE-MANAGEMENT CONFERENCE

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

1. Plaintiff-centered Discovery
 - a. Census Protocol
 - i. Update on process to date
 1. PLC report per CMO 12, ¶ II.D (ECF No. 158, PageID #4040)
 2. Census Form response volume and deficiency notice timing
 - b. Record Collection Pool
 - i. Update on process to date
 1. RCP authorizations and Census completed
 2. Authorization edit to CMO Nos. 12, 13, and 15
 3. Defense report per CMO 15, ¶ III.C (ECF No. 207, PageID #5679)
 4. RCP Show Cause and Provisional Replacement Order

- c. Bellwether Discovery
 - i. PFS and DFS – Plaintiffs propose August 1 deadline to submit final stipulated or comparative submissions. Defendants propose August 29 deadline to submit final stipulated or comparative submissions.
- 2. Defendant-centered Discovery
 - a. Court rulings on 30(b)(6) deposition topics
 - b. Non-custodial Production Protocol – August 15 deadline to submit final stipulated or comparative submissions
 - c. Custodial production Wave 1 – Child/Family non-production of attachments
 - d. Redaction challenge/request for *in camera* inspection as to prior Suboxone Film litigation deposition transcripts (Defendants' request this be moved to September hearing.)
- 3. *Non-compliance with records requests to healthcare providers (if necessary)*

Dated: July 11, 2025

Respectfully submitted,

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