

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

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

Defendants' Report on Record Collection

Pursuant to ECF #207, Page ID #5679, Defendants submit this report on progress toward completing records collection for the Records Collection Pool. As of July 8, 2025, for the Record Collection Pool Plaintiffs:

1. The below figures at 1(a) & (b) were provided by Rubris:
 - (a) 199 Plaintiffs have submitted authorizations only.
 - (b) 158 Plaintiffs have submitted both authorizations and Census Forms.
2. Record requests have been sent to 2986 providers.
3. Records collection is substantially complete for 1 Plaintiff.
4. Defendants have produced 1472 record sets via Crosslink.
5. Defendants have encountered limited issues relating to healthcare noncompliance with Case Management Order No. 13. Certain facilities are requiring proprietary authorizations. Some facilities maintain that their proprietary authorizations are required because the authorization provided does not meet the requirements of applicable state or federal law. Several other difficulties in this category involve undeliverable provider addresses. Others involve, e.g., a purported requirement for patient pickup of the records, or communication problems (e.g. provider stating records had been sent when they had not). Defendants have sent a revised authorization to the PLC addressing 42 C.F.R. Part 2. Defense counsel is continuing to work with Plaintiffs' counsel and its vendor to expeditiously resolve these issues.

Dated: July 11, 2025

Respectfully submitted,

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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 July 11, 2025, the foregoing *Defendants' Report on Record Collection* 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