

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to:**

**Smalls v. Zhejiang Huahai  
Pharmaceutical Co., Ltd. et al.  
Case No. 1:20-cv-08199-RMB-SAK**

**Garcia v. Zhejiang Huahai  
Pharmaceutical Co., Ltd. et al.  
Case No. 1:20-cv-07957-RMB-SAK**

**Suits v. Zhejiang Huahai  
Pharmaceutical Co., Ltd et al.  
Case No. 1:20-cv-06547-RMB-SAK**

**Lee v. Zhejiang Huahai  
Pharmaceutical Co., Ltd. et al.  
Case No. 1:20-cv-15324-RMB-SAK**

MDL No. 2875

Honorable Renée Marie Bumb,  
Chief Judge

**ORDER  
ESTABLISHING  
AMENDED CASE  
MANAGEMENT  
SCHEDULE  
FOR WAVE 2  
BELLWETHER CASES**

**The Special Master Having Previously Entered** the Order Establishing  
Amended Case Management Schedule for Wave 2 Bellwether Cases on May 14,  
2025 (ECF No. 3054),

**The Parties Having Met and Conferred**, to agree upon the second amended case management schedule for the second wave of potential personal injury bellwether plaintiff (“Wave 2 BW”) trials in the following matters:

1. Garcia, Robert – 1:20-cv-07957
2. Lee, Robert – 1:20-cv-15324
3. Smalls, Evon – 1:20-cv-08199
4. Suits, James – 1:20-cv-06547

**Having Reviewed** the proposed, agreed-upon, second amended schedule,

**IT IS ORDERED:** the deadlines for the four above matters previously established in ECF No. 3054 and ECF 2988 are amended and the deadlines for the four above matters are:

| <b>Wave 2 BW Trial Event</b>  | <b>Wave 2 BW Trial Date</b>                   |
|---|---|
| Deadline to amend Plaintiff Fact Sheet                                    | 3/14/2025                                     |
| Close of case-specific fact discovery                                     | 6/23/2025                                     |
| Deadline for Plaintiff to designate experts and serve expert report(s)    | 6/30/2025                                     |
| Deadline for Defendants to designate experts and serve expert report(s)   | 8/15/2025                                     |
| Depositions of experts  | 8/15/2025 – 9/19/2025                         |
| Close of expert discovery   | 9/19/2025                                     |
| Deadline for parties to exchange deposition designations                  | 9/30/2025<br>(Completion of rolling exchange) |
| Deadline to file: (i) Rule 702 motions; and (ii) summary judgment motions | 10/8/2025                                     |

|  |   |
|--|---|
| Deadline to submit deposition designations, objections, and counter-designations to the Court  | 10/27/2025  |
| Deadline to file oppositions to: (i) Rule 702 motions; and (ii) summary judgment motions   | 11/10/2025  |
| Deadline to file replies in further support of: (i) Rule 702 motions; and (ii) summary judgment motions                                    | 11/24/2025  |
| Parties to submit (joint or separate if no agreement) position statement(s) to Court on proposed selection of Wave 2 bellwether trial case | 3 business days after the Court's ruling on Rule 702/MSJs |
| Deadline to file motions in limine   | 12/15/2025*   |
| Deadline to file oppositions to motions in limine  | 1/12/2025*  |
| Deadline to submit joint final pretrial order  | 1/15/2025*  |

\* Dates to be adjusted pending Court's identification of trial start date

June 16, 2025

/s/ Thomas I. Vanaskie  
Hon. Thomas I. Vanaskie (Ret.)  
Special Master