

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

In Re: VALSARTAN, LOSARTAN AND
AND IRBESRTAN PRODUCTS
LIABILITY LITIGATION

Civil No. 19-2875 (RBK/JS)

**STIPULATION AND ORDER MEMORIALIZING AGREEMENT AS BETWEEN
PLAINTIFFS; HETERO LABS, LTD.; HETERO DRUGS; HETERO USA, INC;
AND CAMBER PHARMACEUTICALS, INC.**

RECITALS

THIS MATTER HAVING COME before the Court on Defendant Manufacturers' Motion to Modify the ESI Search Terms (D.E. 445); and **THIS COURT HAVING CONSIDERED** the parties' submissions in support of and in opposition to said Motion, as well as the argument and representations of counsel made during the telephonic status conference on June 17, 2020,

IT IS HEREBY ORDERED on this 23rd day of June 2020, as follows:

1) Based on affirmations from counsel that an agreement has been reached to resolve the parties' current dispute concerning ESI search terms, the Defendants' Motion to Modify the ESI Search Terms is **DENIED AS MOOT** as to Defendants Hetero Labs, Ltd. and Hetero Drugs, Ltd. (collectively, "HLL").

2) For purposes of effectuating and memorializing the agreement reached between Plaintiffs and HLL, the Court **STATES FURTHER**

- a. HLL will search its custodial records using the search terms articulated in Exhibit H of the December 23, 2019 Order. (D.E. 328).
- b. HLL's search will be conducted in the manner set forth in the December 23 Order and HLL and Plaintiffs will continue to meet and confer and reach agreement regarding specific discrete modifications that arise during the collection and review process such as eliminating certain common names or phrases to avoid over-inclusiveness as long as such conferral or modification does not result in delay of document production.
- c. Hetero USA and Camber will assist HLL regarding production of those documents responsive to HLL's discovery obligations that are in Camber Pharmaceuticals' and Hetero USA's possession, custody or control.

SO ORDERED.



HON. JOEL SCHNEIDER
United States Magistrate Judge

Term / Name	Agreed Modifications for The Aurobindo Parties
("PROCESS I" or "PROCESS II") AND (acid*)	Remove
("PROCESS I" or "PROCESS II") AND (amlodipine*)	Remove
("PROCESS I" or "PROCESS II") AND (aqueous*)	Remove
("PROCESS I" or "PROCESS II") AND (HCT or HCTZ)	Remove
("PROCESS I" or "PROCESS II") AND (hydrochlor*)	Remove
(ANDA) AND (amlodipine*)	Remove
(ANDA) AND (HCT or HCTZ)	Remove
(ANDA) AND (hydrochlor*)	Remove
(distribut*) AND (acid*)	Remove
(distribut*) AND (amlodipine*)	Remove
(distribut*) AND (HCT or HCTZ)	Remove
(distribut*) AND (hydrochlor*)	Remove
(delet* or destroy* or remov* or trash* or shred*) AND (Agency)	Remove
(delet* or destroy* or remov* or trash* or shred*) AND (blood*)	Remove
(delet* or destroy* or remov* or trash* or shred*) AND (HCTZ)	Remove
(delet* or destroy* or remov* or trash* or shred*) AND (hyrdochloro*)	Remove
(Patel) AND ("Abbreviated New Drug Application" or ANDA)	Remove

(Patel) AND ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park")	Remove
(Patel) AND (CDER or "Center for Drug Evaluation and Research")	Remove
(Patel) AND (DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency")	Remove
(quality) AND (test*)	Change to quality w/10 test*
(investigat*) AND ("Abbreviated New Drug Application" or ANDA)	Change to (investigator* or investigation*)
(investigat*) AND ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park")	Change to (investigator* or investigation*)
(delet* or destroy* or remov* or trash* or shred*) AND (regulat*)	Change to (delet* or destroy* or remov* or trash* or shred*) w/300 (regulat*)
(delet* or destroy* or remov* or trash* or shred*) AND (test*)	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 (test*)
(delet* or destroy* or remov* or trash* or shred*) AND (CDER or "Center for Drug Evaluation and Research")	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 (CDER or "Center for Drug Evaluation and Research")
(delet* or destroy* or remov* or trash* or shred*) AND (DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency")	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 (DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency")
(delet* or destroy* or remov* or trash* or shred*) AND ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park")	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park")
(delet* or destroy* or remov* or trash* or shred*) AND ("Abbreviated New Drug Application" or ANDA)	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 ("Abbreviated New Drug Application" or ANDA)