

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

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

Civil No. 19-2875 (RBK/JS)

This Document Relates to:

All Actions

**STIPULATED ORDER EFFECTUATING AGREEMENT
REGARDING ESI SEARCH TERMS PERTAINING TO THE ZHP DEFENDANTS**

THIS MATTER HAVING COME before the Court on Defendants' Motion to Modify the ESI Search Terms (Dkt. 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, this the 24th 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** with respect to Torrent Pharmaceuticals, Ltd., and Torrent Pharma, Inc. ("Torrent");

2) For purposes of effectuating and memorializing the agreement reached between Plaintiffs and Torrent, and based on the agreement between Plaintiffs and Torrent, the Court

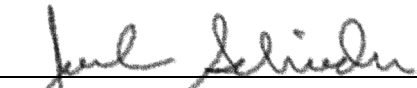
STATES FURTHER:

a. Torrent will search the custodial records of their custodians using the search terms contained in, and in the manner described in, Exhibit H to the December 23, 2019 Order (Dkt. 328 at 29-57, the "December 23 Order"), except that they will

apply the agreed modifications to those search terms set forth in Exhibit 1 to this Stipulated Order and, should the need arise from either party, make additional mutually agreed-to discrete modifications without Court intervention and as long as such modifications do not result in a delay of document production;

b. In addition to the above, the parties will proceed in accordance with the ESI Protocol (Dkt. 125), as well as their representations and the Court's instructions made during the June 17, 2020 status conference, to resolve issues through the meet and confer process, if any, that might arise during the processing, review, and production of Torrent's ESI.

SO ORDERED.



JOEL SCHNEIDER
United States Magistrate Judge

Standalone

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
(*11025* or *18253* or *202223* or *203311* or *203820* or *20473* or *205347* or *20939* or *23491* or *24544* or *24873* or *29392* or *77530* or *78030* or *90483* or *90642* or *90866* or *91235*)	Change to: (*202377* or *201593* or *202728*)
EIR or “establishment inspection report”	Move to regulatory terms

Authors or Inspectors

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians	
Agrawal	Atul	Remove term
Akhtar	Saleem	Remove term
Amin	Pankaj	Remove term
Arasu		Remove term
Arista		Remove term
Arroyo		Remove term
Baker	Peter	Remove term
Barreto		Remove term
Barrowcliff		Remove term
Bellamy		Remove term
Bernard	Tonia	Remove term
Bizjak		Remove term
Boyd	Justin	Remove term
Bretz	Paula	Remove term
Brown	Darren	Remove term
Casale		Remove term
Chapman	Johnathan	Remove term
Charity	Antony	Remove term
Chester	Bonita	Remove term
Cosgrove		Remove term
Cruz		Remove term
Dezan		Remove term
Dobbin		Remove term
Dombrowski		Remove term
Donald	Steven	Remove term
Dong	Eric	Remove term
Eban		Remove term
Ernst		Remove term
Estrella	Maria	Remove term
Etminan		Remove term
Ford	Susanna	Remove term
Frazier	Laurie	Remove term
Gavini		Remove term

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)		Agreed Primary Search Term Modifications for Torrent Custodians
George	Jogy	(George w/3 Jogy) OR (Jogy AND <regulatory modifiers>)
Ghoshal	Rabin	Remove term
Gidado		Remove term
Hall	Patrice	Remove term
Hallas		Remove term
Hebert or Della or Dellareese		Remove term
Hicks	Kellia	Remove term
Higgins	Brooke	Remove term
Huaren		Remove term
Hustedt		Remove term
Johansen		Remove term
Jones	Latoria	Remove term
Karapetyan*		Remove term
Khan	Farhana	Remove term
Khurana	Sangeeta	Remove term
Kristensen		Remove term
Mankind		Remove term
Mansournia		Remove term
Marcisin		Remove term
Martinez	Miguel	Remove term
Mason	James	Remove term
Mayasandra	Pal	Remove term
Melende		Remove term
Min	Ko	Remove term
Mistler		Remove term
Motamed		Remove term
Motta		Remove term
Mueller		Remove term
Navas		Remove term
Nguyen	Truong	Remove term
Oladimeji		Remove term
Panicker		Remove term
Patel	Nayan	Remove term
Philopoulos		Remove term
Pitts	Simone	Remove term
Podaralla	Satheesk	Remove term
Pottegard		Remove term
Priester		Remove term
Pyramides		Remove term
Quartarolo		Remove term
Ray	Marcus	Remove term
Razzaghi	Frederick	Remove term
Roberts	Daniel	Remove term

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)		Agreed Primary Search Term Modifications for Torrent Custodians
Roy	Melissa	Remove term
Schwartz	Paul	Remove term
Shah	Dipesh	Remove term
Skanchy		Remove term
Srivasta		Remove term
Srivastava	Rajiv	Remove term
Stieg		Remove term
Sweeney		Remove term
Szestypalow		Remove term
Tomasso		Remove term
Ulysse		Remove term
Upadhyay	Pratik	Remove term
Verdel		Remove term
Wakijira	Chaltu	Remove term
Warnick		Remove term
Xu	Atul	Remove term
Young	Rochelle	Remove term
Yuscius		Remove term
Zaklady		Remove term
Zamperini		Remove term
Zhen Zhou		Remove term

Regulatory

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)		Agreed Primary Search Term Modifications for Torrent Custodians
("adverse event*" or AER) and (<drug name> or <solvents> or <facility names>)		Change AND to w/200
CFR or eCFR or "code of federal regulations" or USC or "United States Code" or "Title 21"		Change AND to w/200
inspect*		Change AND to w/250
investigat*		Change AND to w/250
warn*		Change AND to w/250

cGMP

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)		Agreed Primary Search Term Modifications for Torrent Custodians
bury or burie* or conceal*		Change AND to w/200
cGMP* or (current pre/5 manufacturing) or GMP*		Change AND to w/200 and omit amlodipine, HCT, and HCTZ from the modifier list.
"cover up*" or coverup* or "cover-up*"		Change AND to w/200
crash* or disaster*		Change AND to w/200
data /4 integrity or data /4 reliabl*		Change AND to w/200

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
delet* or destroy* or remov* or trash* or shred*	Change AND to w/200; apply addition exclusionary terms to exclude hits from email footers, exclude this term from being run against file path names.
hide* or suppress*	Change AND to w/200
whistleblow*	Change AND to w/200

QA-Testing

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
chromato*	Change to (chromato* OR empower*) w/500
complain*	Move to modifiers list
degradant* or impurit*	Break into 2 different terms; for impurity* change AND to w/200.
fail*	Change AND to w/200
observation*	Remove
quality	Remove
residu*	Change AND to w/200
risk*	Change AND to w/200
suitab*	Remove
toxic*	Change AND to w/200
unknown* or unk or unks	Change AND to w/500
validat*	Change AND to w/200

Manufacturing

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
error*	Change AND to w/100
recycl*	Change AND to w/200
solvent*	Change AND to w/100

Medical Conditions

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
blood*	Remove
death* or dead or fatal	Change AND to w/200; break out each term

Entities

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
ANDA	Replace with ANDA AND NOT ((abbreviated w/3 application) OR FDA)
distribut*	Remove

Drug Names

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
amlodipine	Move to solvents list
HCT or HCTZ	Move to solvents list

Solvents Modifiers

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
acid*	Remove

Inspect Modifiers

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
inspect*	Change to (inspector or inspectors or inspection or inspections)
regulat*	Change to (regulator or regulators or regulatory)

Medical Conditions Modifiers

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
blood*	Remove

Facility Names

Primary Search Term (this is meant to refer to a primary term with any applicable modifiers)	Agreed Primary Search Term Modifications for Torrent Custodians
Plaintiffs have just received the lists provided by Defendants and are still determining how to best search for facility names, as many facilities appear to be just referred to by the city name.	Indrad OR #3005029956 OR FEI3005029956