

ADMINISTRATIVE ORDER NO. 1: SERVICE & SUBMISSION INSTRUCTIONS

Note: The following submission instructions do not apply to service of new or supplemental Plaintiff Fact Sheets, as required by Section III.B.3 of this Order. As indicated in Section III.D, service of the Plaintiff Fact Sheet shall be made according to the procedures outlined in Case Management Order No. 18.

These submission instructions apply to all documents and records required to be submitted pursuant to Section III.D of Administrative Order No. 1, except the Plaintiff Fact Sheet required by Section III.B.3. Plaintiffs shall produce to Defendant any such records, documents or reports by uploading them to a secure file share site in the manner and format explained below.

I. File Share Access

Plaintiff's counsel (or Plaintiff, if proceeding *pro se*) shall send a request to Invokana@btlaw.com with the following information: The Plaintiff's name, the injury/injuries claimed by the Plaintiff, the name of Plaintiff's counsel, the names and email address of any/all team members who require access to the file transfer site. To the extent a firm represents multiple Plaintiffs subject to the Order, Plaintiffs' counsel may include the foregoing information for each Plaintiff in one email to Invokana@btlaw.com.

Following receipt of the request, counsel for Janssen will send Plaintiff's counsel an email invitation from Invokana@btlaw.com containing a link to the site and a temporary password. Once accessed, Plaintiff's counsel will see a folder with the name of his/her firm and a subfolder for Plaintiff's claimed injury type.¹ It is important that records for each Plaintiff be foldered correctly to avoid delay in review and/or unnecessary deficiency notices.

For each Plaintiff, Plaintiff's counsel shall name the top folder with the name of the claimant in the format: Last Name, First Name, Case Number (*i.e.* Doe, Jane, 16-md-2750) and shall place all records, documents and reports within that folder.

Note: In the event Plaintiff's counsel already has requested and received File Share Access from Defendants, no additional request is required.

II. Records Format

A. Pharmacy & Medical Records

All pharmacy and medical records shall be produced to Defendants as searchable PDFs with each facility or provider record produced as a separate PDF. No individual PDF produced shall exceed 100 MB (100,000 KB). In the event that PDFs larger than 100 MB are produced, Plaintiff's counsel will be advised of the issue and will be required to resubmit a new version of the file that is under 100 MB.

¹ Each firm will only have access to its own folder.

PDFs shall be named using the following format: sequential numbering, Plaintiff's Last Name, Plaintiff's First Name, and the name of the facility or provider that produced the records. For example, the second PDF produced by Plaintiff Jane Doe from Memorial Hospital shall be named "2 Doe, Jane_Memorial Hospital."

Each PDF also must be Bates-numbered in the following format: a combination of an alpha prefix containing plaintiff's initials and the initials of the facility or provider name along with a 4-digit number and be numerically sequential within a given PDF. For example, for claimant Jane Doe's records from Memorial Hospital use JD_MH_0001. Please be sure to begin Bates numbering on the first page of the PDF (even if that page is the authorization form or slip sheet).

B. Expert Reports & Affidavits

Any expert report produced to Defendants shall be named using the following format: the words "Report of" followed by the name of the expert, Plaintiff's Last Name, and Plaintiff's First Name. For example, a report from expert Frank Smith produced by Plaintiff Jane Doe should be named "Report of Frank Smith_Doe, Jane."

The affidavit required by Section III.B.5 of Administrative Order 1 shall be named "Affidavit of [Plaintiff Name]."

III. Questions & Concerns

Questions or concerns regarding these instructions and/or access to the FTP site should be directed to Invokana@btlaw.com.