

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

IN RE: VALSARTAN N-  
NITROSODIMETHYLAMINE (NDMA),  
LOSARTAN, AND IRBESARTAN  
PRODUCTS LIABILITY LITIGATION

Civil No. 19-2875 (RBK/JS)

**ORDER**

The Court having held a conference call with the parties on September 16, 2020; and this Order intending to confirm the Court's instructions set forth on the record; and good cause existing for the entry of this Order; and for all the reasons stated by the Court,

**IT IS HEREBY ORDERED** this 17th day of September 2020, as follows:

1. The parties shall meet and confer regarding a proposed deposition protocol prior to the September 30, 2020 monthly status conference. Given the unique circumstances of each manufacturing defendant, the parties should consider whether it is appropriate to attach to the protocol an addendum that applies to a particular defendant. The Court

expects to enter the final deposition protocol by October 28, 2020.

2. By October 1, 2020, plaintiffs shall serve proposed FED.R.CIV.P. 30(b)(6) deposition notices leaving the date blank. Defendants shall serve written objections by October 15, 2020. The notices shall be served on the manufacturing defendants and lead downstream defendants plaintiffs plan to depose first. To the extent feasible, defendants shall attempt to coordinate common objections. Discovery dispute letters shall be served in advance of the October 28, 2020 monthly status conference after the parties meet and confer. The parties' notices and objections are made without prejudice to their ability to make adjustments based on their final document/ESI productions and the rulings on the outstanding motions.
3. In advance of the September 30, 2020 conference, plaintiffs shall identify the entities they intend to serve with third-party document subpoenas. The subpoenas shall be served by October 15, 2020.
4. The parties shall include as an agenda item for the September 30, 2020 conference their proposed dates to start and complete the depositions of all class action plaintiffs. Another agenda item is plaintiffs plan for how they will proceed with depositions and their priorities.

The Court anticipates that the depositions of the party  
defendants will commence no later than January 15, 2021.

s/ Joel Schneider  
JOEL SCHNEIDER  
United States Magistrate Judge