

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

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

Civil No. 19-2875 (RBK/JS)

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**CASE MANAGEMENT ORDER NO. 23**

The deadlines established by Revised Case Management Order No. 22 (Doc. 726) having been extended sixty (60) days by Special Master Order No. 2 (Doc. 843), and it appearing prudent that a new Case Management Order [“CMO”] be issued, which confirms the specific deadlines for those events covered by Revised Case Management Order No. 22 [“MDL Deadlines”]; and this CMO confirming those MDL Deadlines,

It is hereby ORDERED this 11th day of February, 2021, as follows:

- 1) No personal jurisdiction motions may be filed without leave of court.
- 2) No summary judgment motions may be filed without leave of court.
- 3) No amended complaints shall be filed without leave of court to be requested in a Motion to Amend.
- 4) All requests to vacate dismissals entered on account of the Order to Show Cause process shall be made via a formal motion.
- 5) The following scheduling deadlines shall be in effect:
  - **June 1, 2021** - Deadline to complete first phase of fact discovery, including:
    - Depositions of Manufacturer Defendants.<sup>1</sup>

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<sup>1</sup> For purposes of this Case Management Order, "Manufacturer Defendants" refers to the Defendants for whom the Court has approved 30(b)(6) Notices in Dkt. No. 651.

- Depositions of current economic loss and medical monitoring putative class representatives.
- Depositions of at least ten (10) personal injury bellwether plaintiffs.
- **July 6, 2021** - Deadline for plaintiffs to serve their expert reports addressing general causation with dates the experts are available to be deposed.
- **August 2, 2021** - Deadline for defendants to serve their expert reports addressing general causation with dates the experts are available to be deposed.
- **September 1, 2021** - Deadline to complete depositions of plaintiffs' general causation experts.
- **October 4, 2021** - Deadline to complete depositions of defendants' general causation experts.
- **October 4, 2021** - Deadline to complete second phase of fact discovery, including:
  - Depositions of the remainder of personal injury bellwether plaintiffs not previously deposed.
  - Depositions of third parties identified by defendants and plaintiffs (including treaters/prescribers).
  - Depositions of third parties plaintiffs have subpoenaed, to the extent allowed by the Court.
  - Depositions of any new putative economic loss class representative allowed by the Court.
  - Further discovery, if any, of wholesaler and retailer/pharmacy defendants (to begin on or after June 1, 2021).
- **November 1, 2021** - Deadline to file Daubert motions regarding general causation experts.
- **November 3, 2021** - Deadline for plaintiffs to file motion(s) for class certification and serve their expert reports addressing class certification with dates the class certification experts are available to be deposed.
- **December 1, 2021** - Deadline to file responses to Daubert motions regarding general causation experts.
- **January 3, 2022** - Deadline to file replies to responses to Daubert motions regarding general causation experts.

- **January 5, 2022** - Deadline for defendants to serve their expert reports addressing class certification with dates the experts are available to be deposed.
  - **February 3, 2022** - Deadline to complete depositions of plaintiffs' class certification experts.
  - **March 3, 2022** - Deadline to complete depositions of defendants' class certification experts.
  - **March 15, 2022** - Deadline for defendants to file responses to class certification motions.
  - **April 5, 2022** - Deadline to file Daubert motions regarding class certification experts.
  - **April 12, 2022** - Deadline for plaintiffs to file replies to responses to class certification motions.
  - **May 4, 2022** - Deadline to file responses to Daubert motions regarding class certification experts.
  - **May 18, 2022** - Deadline to file replies to responses to Daubert motions regarding class certification experts.
- 6) By **February 22, 2020** the parties shall complete fulsome discussions regarding the names, dates, and locations of depositions to be taken starting on January 19, 2021.

/s Robert B. Kugler  
ROBERT B. KUGLER  
United States District Judge