

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 30, 2020; and this Order intending to confirm the Court's rulings; and good cause existing for the entry of this Order; and for all the reasons stated by the Court on the record,

**IT IS HEREBY ORDERED** this 2nd day of October 2020, as follows:

1. By October 30, 2020, defendants shall serve their objections to plaintiffs' Rule 30(b)(6) deposition notices. Thereafter, the parties shall meet and confer. Any disputes shall be put on the agenda for the mid-November conference call. The parties shall discuss, inter alia, a date by which the defendants will identify the witness(es) to be produced in response to plaintiffs' Rule 30(b)(6) deposition notices.
2. Given the Court's direction that it expects to enter a final Deposition Protocol by October 28, 2020 [Doc. No.

575, ¶ 1], the parties shall serve a proposed Protocol by October 26, 2020 or a list of issues in dispute. The Protocol may include a separate Addendum for each manufacturing defendant.

3. By October 7, 2020, plaintiffs shall serve each manufacturing defendant with proposed additions to plaintiffs' priority custodian lists. The priority custodian lists shall be deemed to be plaintiffs' preliminary lists of priority deponents. Thereafter, plaintiffs shall meet and confer with each manufacturing defendant regarding the logistics of the depositions and the Addendum to be attached to the Deposition Protocol to be entered. Plaintiffs shall promptly identify the person(s) who will be primarily responsible for the meet and confer sessions with each manufacturing defendant. Plaintiffs' lists are without prejudice to plaintiffs' right to change its priorities and without prejudice to defendants' right to assert objections to the lists.
4. All disputes and agenda items for the next scheduled conference call shall be served by October 12, 2020. An agenda item for the next conference call is any disputes regarding the recent document requests directed to the class action plaintiffs.

5. The depositions of the class action plaintiffs may start on December 1, 2020 but shall commence no later than January 15, 2020. These depositions shall be completed by March 26, 2020. The start date for the depositions of the defendants is no later than January 15, 2020. See Doc. No. 575, ¶ 3.
6. The next regularly scheduled conference call will be held on October 14, 2020 at 4:00 p.m. The next monthly status conference will be held on October 28, 2020 at 10:00 a.m. and 2:00 p.m.

s/ Joel Schneider  
JOEL SCHNEIDER  
United States Magistrate Judge