

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

IN RE: VALSARTAN, :
LOSARTAN, and IRBESARTAN : **MDL No. 19-2875 (RBK/KW)**
PRODUCTS LIABILITY LITIGATION :
: :
This Order Relates to all Cases :

SPECIAL MASTER ORDER NO. 18

NOW, this 3rd day of May, 2021, a case management conference having been held on this date during which several rulings of a procedural nature were made, and intending to have those rulings placed on the docket in this matter,¹ **IT IS HEREBY ORDERED THAT:**

1. Defendant Aurobindo shall file its brief in opposition to Plaintiffs’ Motion to Strike Aurobindo’s Defenses (Doc. 1182) no later than **May 7, 2021**. Plaintiffs may file a reply brief no later than **May 11, 2021**. Argument on Plaintiffs’ Motion to Strike Aurobindo’s Defenses shall be held during the discovery conference call on **May 12, 2021**.

¹ To the extent that the transcript of today’s conference reveals discrepancies with respect to the deadlines and other matters set forth in this Order, a revised Order will be issued.

2. The ZHP Defendants shall move for a protective order with respect to the deposition of Boahua Chen on the basis of the “Apex Witness” doctrine no later than **May 17, 2021**.
3. The ZHP Defendants shall file a brief in opposition to Plaintiffs’ request for the production of Mr. Chen’s custodial file (made in Plaintiffs’ letter of April 27, 2021 (Doc. 1189)) no later than **May 14, 2021**. Plaintiffs may reply to the ZHP opposition brief no later than **May 17, 2021**.
4. The ZHP Defendants’ request to postpone of the deposition of Boahua Chen until the week of June 21, 2021 is **GRANTED**. The parties shall confer in good faith to set the dates of a deposition of Mr. Chen while the ZHP Defendants’ Motion for a Protective Order is pending.
5. Plaintiffs and the Retailer Defendants shall meet, confer, and negotiate in good faith with respect to the parameters of Plaintiffs’ proposed requests for production of documents numbered 1 and 2. There is no need to meet, confer, and negotiate at this time with respect to the parameters of Plaintiffs’ proposed request for production of documents numbered 8.
6. The parties shall submit a written status report concerning discovery requests addressed to the Wholesaler Defendants no later than **May 26, 2021**.

7. Briefs in Opposition to Plaintiffs' Motion for Leave to Amend Master Complaints (Doc. 1148) shall be filed no later than **May 27, 2021**. The Retailer Defendants are granted leave to file an over length brief not to exceed 50 pages. Plaintiffs may file a reply brief no later than **July 12, 2021**. Their reply to the Retailer Defendants' Opposition Brief shall not exceed 50 pages. Defendants may file sur reply briefs no later than **August 2, 2021**.

s/ Thomas I. Vanaskie
Hon. Thomas I. Vanaskie (Ret.)
Special Master