

JUL 20 2021

RACHELLE L. HARZ

SUPERIOR COURT OF NEW JERSEY, J.S.C.

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IN RE: TASIGNA PRODUCTS  
LIABILITY LITIGATION

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LAW DIVISION: BERGEN COUNTY  
CASE NO. 635  
MASTER DOCKET NO.: BER-L

CIVIL ACTION

**CASE MANAGEMENT ORDER #1**

**THIS MATTER** having been assigned to the Honorable Rachelle L. Harz, J.S.C., pursuant to the Supreme Court's Order of April 6, 2021, designating this matter for Multicounty Litigation ("MCL") status, and the Court having received a proposed agenda from counsel for the parties, and having conducted an initial Case Management Conference on July 8, 2021 (via Webex), and for the reasons set forth on the record and good cause shown,

IT IS on this 20<sup>th</sup> day of July, 2021, **ORDERED**:

**1. Master Complaint**

Plaintiffs' Counsel shall file a master complaint by **July 28, 2021**.

**2. Dispositive Motions**

**Plaintiffs' Proposed Language:** The parties are to meet and confer regarding Defendant's stated intention to file a motion to dismiss in response to the Master Complaint, if appropriate and permitted by the Court, and be prepared to address this issue with the Court at the next Case Management Conference.

**3. Discovery**

The parties shall, as soon as practicable, submit by email a joint letter and chart listing each search term proposed by the parties. The joint submission shall identify the search terms for which the parties are in agreement and which are in dispute.

On **August 4, 2021**, the parties shall by email make separate submissions setting forth the proposed custodians, including each custodian's position or title and dates in that position.

Plaintiffs shall provide a brief explanation why each custodian is relevant to the claims and/or defenses at issue. For each custodian to which Defendant objects, Defendant shall provide a brief explanation of its objections.

**4. Pleadings**

Upon receipt of an electronically filed Complaint, wherein the data entered by Plaintiff's Counsel does not accurately reflect the physical pleading, the Clerk is granted the authority to update the data in the Judiciary's Automated Case Management System ("ACMS") to accurately reflect what is listed on the physical pleading absent a subsequent court order. All parties have consented to this provision.

**5. Case Management Conferences**

The Court will conduct the next Case Management Conference on **August 11, 2021**, at 10:30 AM eastern via Webex conference.

Counsel shall submit an agenda for the Case Management Conference seven (7) days prior to the Case Management Conference, which shall be submitted by email to [antonious.sadek@njcourts.gov](mailto:antonious.sadek@njcourts.gov). The Court will conduct conferences, anticipated to be held every 45 to 60 days, and in addition the parties may request status, scheduling, and case management conferences to discuss the progress regarding relevant issues. Reasonable notice of all such conferences will be provided to all counsel of record.

Counsel shall keep the Court apprised of any relevant developments with respect to the motion to transfer pending before the Judicial Panel on Multidistrict Litigation.

Dated: July 20, 2021

  
Judge Rachelle Lea Harz, J.S.C.