

FILED

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MARY F. THURBER, J.S.C.

Thomas J. Herten, Esq. (Attorney No. 004491974)  
Nicole G. McDonough, Esq. (Attorney No. 025762008)  
ARCHER & GREINER, P.C.  
21 Main Street, Suite 353  
Court Plaza South - West Wing  
Hackensack, New Jersey 07601  
(201) 342-6000  
*Attorneys for Defendants Tissue Science Laboratories  
Limited and Sofradim Production SAS*

CATHERINE GUERRERO,

Plaintiff,

v.

C.R. BARD, INC., et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION BERGEN COUNTY  
**DOCKET NO. BER-L- 017838-14**  
**MASTER DOCKET NO. BER-L-17717-14**

Civil Action

In Re: Pelvic Mesh/Bard Litigation  
Case No. 292

~~AMENDED DISCOVERY SCHEDULING  
ORDER~~



**THIS MATTER**, having come before the Court by way of stipulation filed by counsel for the Covidien Defendants, Archer & Greiner P.C., and counsel for Plaintiff Catherine Guerrero ("Plaintiff"), Kline & Specter P.C., seeking an amendment to the Discovery Scheduling Order entered by the Court on October 22, 2018, and counsel for the parties having agreed on the following amendments to the discovery schedule, and for good cause shown,

**IT IS ON THIS 16<sup>th</sup>** day of January 2019, **ORDERED** as follows:

1. ~~Plaintiff shall produce an updated fact sheet to the Covidien Defendants by~~

~~February 13, 2019;~~

2. ~~All fact discovery shall be completed by May 14, 2019;~~

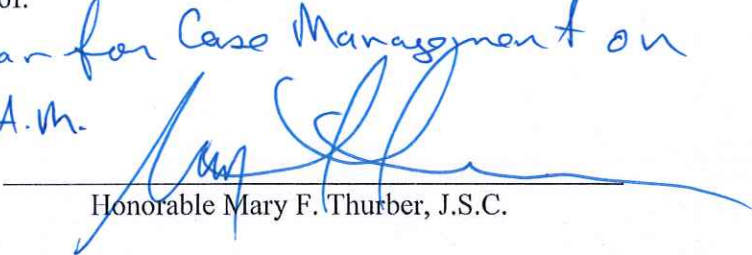
3. ~~Plaintiff shall produce any and all expert reports by June 12, 2019;~~

4. The Covidien Defendants shall produce any and all expert reports by July 15, 2019;
5. Expert Depositions shall be completed by September 11, 2019;
6. Dispositive motions, Kemp motions, and Motions *in limine* (collectively, the "Motions") shall be filed by October 14, 2019;
7. Opposition to the Motions shall be filed by November 13, 2019;
8. Reply papers in further support of the Motions shall be filed by December 4, 2019;
9. Trial shall begin on January 6, 2020; and

**IT IS FURTHER ORDERED** that a copy of this Order shall be served on all counsel of

record within seven (7) days of the date hereof.

*Counsel are directed to appear for Case Management on February 20, 2019, at 11:00 A.M. The Court will accommodate an earlier date if requested.*

  
 Honorable Mary F. Thurber, J.S.C.

THE UNDERSIGNED HEREBY CONSENT TO THE FORM AND ENTRY OF THIS ORDER:

**KLINE & SPECTER P.C.**  
 Counsel for Plaintiff, Catherine Guerrero

  
 Lee Balefsky

Dated: January 10, 2019

**ARCHER & GREINER P.C.**  
 Counsel for the Defendants, Tissue Science Laboratories Limited and Sofradim Production SAS

  
 Thomas J. Herten

Dated: January 11, 2019

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*\* Although an administrative error occurred and the Court's order of October 27, 2018, apparently was not received by counsel or uploaded to the MCL webpage, the dates in that order were all agreed to by counsel. No explanation was provided for the failure to have advanced toward meeting those deadlines.*