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APR 10 2012

Carol E. Higbee, P.J.C.

In re PELVIC MESH LITIGATION/ BARD,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, ATLANTIC COUNTY

CIVIL ACTION

Case No. 292 CT
Master Case

Hon. Carol E. Higbee, P.J. Cv.

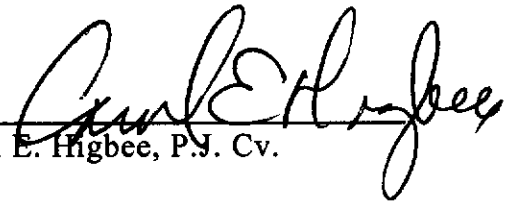
JOINT STIPULATION AND ORDER APPLICABLE TO ALL CASES

Upon consent and request of the parties, Defendants C.R. Bard and Plaintiffs, **IT IS HEREBY ORDERED** as follows:

1. Plaintiffs shall notice all depositions at least 45 days in advance of the deposition;
2. For any notice of deposition where there is an accompanying request for the production of documents, Defendants shall within 10 days of receipt of such notice alert Plaintiffs' Liaison Counsel of any reason that the requested documents cannot be produced a minimum of 14 days prior to the date noticed for the deposition.
3. Absent notice pursuant to paragraph no. 2, Defendants shall produce all non-privileged documents that are responsive to Plaintiffs' requests no less than 14 days prior to the noticed date of deposition.
4. Should the date set on Plaintiffs' notice of deposition need to be altered, the dates for the completion of numbers 1 and 2 above shall be based upon the date of the original notice of

deposition. However, the date for the production of documents under number 3 above shall be based upon the actual date of the deposition.

Dated: 4/10/12



Carol E. Higbee, P.J. Cv.