

FILED

NOV 17 2017

RACHELLE L. HARZ
J.S.C.

**IN RE STRYKER LFIT CoCr V40
FEMORAL HEADS HIP IMPLANT
LITIGATION**

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY**

**CASE NO. 624
MASTER DOCKET
NO.: BER-L- 7857-17 mcl**

**CIVIL ACTION
CASE MANAGEMENT ORDER #4**

All prior orders remain in full force
and effect except as modified by this
Order

This Matter having been assigned to the Honorable Rachelle L. Harz, J.S.C., pursuant to the Supreme Court's Order of September 20, 2017, and this court having conducted a Case Management Conference on November 17, 2017; and counsel appearing, and for good cause shown and for the reasons set forth on the record;

IT IS on this 17th day of November 2017,

ORDERED,

I. STIPULATION AS TO CORRECT PARTIES

1. The parties agree that only Howmedica Osteonics Corp. will be named as a defendant in the Master Complaint or any Short Form Complaint, and the parties have negotiated a Stipulation in this regard. See Master Pleading Implantation Order Exhibit #3.

II. LONG/SHORT FORM PLEADINGS

2. The parties have met and conferred regarding the implementation of long and short form pleadings, and have agreed to the form of an Implementation Order. The Court signed and entered same on November 17, 2017.

3. The long/short form pleadings will be posted on the New Jersey Courts Multi-County Litigation website by the end of the month.

**III. PLAINTIFF AND DEFENSE FACT SHEETS AND RELATED
IMPLEMENTATION ORDER**

4. The Court entered the Fact Sheet Implementation Order on October 31, 2017.

IV. ELECTRONICALLY STORED INFORMATION

5. The parties met and conferred regarding a proposed Order Governing Electronically Stored Data. Said order was signed and entered by the Court on November 17, 2017.

V. PROTECTIVE ORDER

6. The final Protective Order was entered by the Court on November 6, 2017. All counsel have an obligation to read this order and comply with same.

VI. DEPOSITION PROTOCOL

7. The parties are in the process of meeting and conferring regarding a protocol for depositions conducted during the course of the litigation.

VII. WRITTEN DISCOVERY

8. Defendant Howmedica Osteonics Corp. timely served responses to Plaintiffs' First Request for Production on November 1, 2017. The parties are currently meeting and conferring regarding HOC's responses, specifically, as well as the scope of discovery, generally.

VIII. BELLWETHER PROCESS & TRIAL

9. The parties are meeting and conferring regarding the bellwether selection process and timing, as well as a bellwether trial date.

IX. CASE MANAGEMENT CONFERENCE 5

10. The next Case Management Conference is scheduled for January 26, 2018 at 11:00 a.m.

Liaison counsel shall report at 9:30 a.m. Counsel shall submit a proposed agenda seven (7) days prior to this Case Management Conference.

11. A copy of this order will be posted on the Judiciary Website.

Dated: November 17, 2017


Rachelle L. Harz, J.S.C.