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FILED

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Carol E. Higbee, P.J.Cv.

IN RE: BRISTOL-MYERS SQUIBB ENVIRONMENTAL CONTAMINATION LITIGATION	**SUPERIOR COURT OF NEW JERSEY** LAW DIVISION: ATLANTIC COUNTY MASTER DOCKET NO. ATL-l-3517-08 MT CASE NO. 281 **CASE MANAGEMENT ORDER NO. 11**

THIS MATTER having come before the Court for a Case Management Conference on Thursday, April 28, 2011, and counsel for plaintiffs and counsel for defendant, Bristol-Myers Squibb Company ("BMS"), having participated, and for good cause shown,

IT IS on this 23 day of May, 2011, ORDERED that, except to the extent inconsistent with the terms of the within Case Management Order ("CMO"), all prior CMOs remain in full force and effect, and it is further ORDERED as follows:

1. By May 6, 2011, BMS shall serve plaintiffs with all of the responsive documents from the newly-discovered categories of documents that defendant has described as "Maps," "Manufacturing Records," "Squibb Production Materials," and "Inventory Data." Plaintiffs reserve their rights to demand responsive documents from the newly-discovered categories of documents that defendant has described as "New Drug Application Materials" and "Corporate Document Repository" documents.

2. By May 16, 2011, plaintiffs shall review and return to BMS any inadvertently produced documents identified in BMS's February 21, 2011, correspondence, which plaintiffs concede are privileged under the attorney-client privilege and/or the work product doctrine.
3. By June 1, 2011, plaintiffs shall provide notice to BMS of a list of personnel and/or corporate representatives whom plaintiffs wish to depose. The parties shall meet and confer either in-person or telephonically, to schedule these depositions and an Order will be provided to the Court with the dates of the depositions by the next case management conference. Plaintiffs' right to depose additional persons as discovery continues is reserved.
4. By June 6, 2011, BMS shall file a motion to compel the return of the remaining inadvertently produced documents identified in its February 21, 2011, correspondence, which plaintiffs did not concede were privileged under the attorney-client privilege and/or the work product doctrine on May 16, 2011.
5. The discovery milestones as set forth in Case Management Orders Nos. 9 and 10 have been amended as follows:
    a. By June 30, 2011, in consideration of its newly-discovered documents, BMS shall:
        i. Based on the information then available to it, provide an amended interim report to plaintiffs with respect to (i) each product produced at the site; (ii) the dates during which each product was produced; (iii) the general location on the site where each product was produced and stored; (iv) the amount of each product produced

annually (to the extent feasible); and (v) the basic processes, including the chemicals utilized in the processes, used to produce each product (to the extent feasible);

ii. Based on the information then available to it, provide amended responses to plaintiffs' more specific interrogatories and document demands propounded by plaintiffs on December 21, 2010.

b. By August 15, 2011, plaintiffs shall, based on the information then available to them and subject to modification, provide: (i) the specific chemicals alleged to have caused plaintiffs' bodily injuries; (ii) the bodily injuries generally related to each chemical; and (iii) an interim report generally identifying the scientific bases for the plaintiffs' claims of an association between the injuries and the chemicals (to the extent feasible).

6. The next Case Management Conference will be held on Wednesday, July 20, 2011, at 1:30 p.m., at the Atlantic County Courthouse, Courtroom 3-B, 1201 Bacharach Blvd., Atlantic City, New Jersey.

Carol E. Higbee

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