LOWENSTEIN SANDLER PC
Attorneys at Law
65 Livingston Avenue
Roseland, New Jersey 07068
973.597.2500
Attorneys for Defendant
Bristol-Myers Squibb Company

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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. 10**

THIS MATTER having come before the Court for a Case Management Conference on Tuesday, December 14, 2010, and counsel for plaintiffs and counsel for defendant Bristol-Myers Squibb Company ("BMS") having participated, and for good cause shown,

IT IS on this 15 day of Feb, 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 December 22, 2010, plaintiffs shall serve specific interrogatories and document demands regarding approximately forty (40) potentially key products that plaintiffs will select from those products identified by BMS in its Interim Products Report provided to plaintiffs on November 22, 2010. The Court will allow plaintiffs to reserve their right to serve additional specific interrogatories and document demands on the remaining products included in the Interim Products Report. Plaintiffs will prioritize the remaining products from the

Interim Products Report and endeavor to eliminate products that are not central to this matter. In addition, following review of BMS's responses to the interrogatories and document demands, plaintiffs may request that BMS disclose the available, best estimate of the quantities produced for any of the products included in the Interim Products Report. BMS shall provide that information to the extent that it is not unduly burdensome.

2. The parties shall work together in good faith to try and resolve plaintiffs' objections to BMS's assertions of privilege set forth in BMS's privilege logs, and continue such efforts after BMS serves its responses to plaintiffs' objections on December 15, 2010. Should the parties be unable to resolve any of plaintiffs' remaining objections to privilege after such attempts, then plaintiffs will raise the outstanding issues via a telephone conference with the Court or at the next case management conference, and the Court will schedule motion practice, if necessary.

3. Given the one-week extension to which BMS consented for plaintiffs to serve the specific interrogatories and document demands referenced in paragraph 1 above, if necessary, BMS shall be entitled to a one-week extension of the January 31, 2011 deadline to respond to plaintiffs' specific interrogatories and document demands propounded on December 22, 2010. BMS shall also specifically designate the members of its litigation control group as soon as practicable.

4. The next Case Management Conference will be held on Thursday, March 3, 2011 at 1:30 p.m., at the Atlantic County Courthouse, Courtroom 3-B, 1201 Bacharach Boulevard, Atlantic City, New Jersey.

5. At the next case management conference, counsel and the Court will confer regarding the feasibility of the currently pending March 15, 2011 deadline for plaintiffs, based on the information then available to them and subject to modification, to 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).

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