DRINKER BIDDLE & REATH LLP
A Delaware Limited Liability Partnership
500 Campus Drive
Florham Park, New Jersey 07932-1047
(973) 549-7000
Attorneys for Defendants
DEPUY ORTHOPAEDICS, INC., DEPUY, INC.,
DEPUY INTERNATIONAL LIMITED,
JOHNSON & JOHNSON INTERNATIONAL,
JOHNSON & JOHNSON SERVICES, INC., AND
JOHNSON & JOHNSON

FILED

JUN 17 2011

BRIAN R. MARTINOTTI, J.S.C.

IN RE DEPUY ASR™ HIP IMPLANTS LITIGATION	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: BERGEN COUNTY CASE CODE 293 CIVIL ACTION
This Document Relates to All Actions	**CASE MANAGEMENT ORDER NO. 3**

THIS MATTER having been opened to the Court by lead counsel for the parties, and the parties consenting to the form, substance and entry of the Order, and for good cause shown,

IT IS on this 17th day of June 2011;

ORDERED as follows:

1. This Order shall apply to all Plaintiffs and their counsel in DePuy ASR™ Hip Implant Products Litigation actions currently centralized for coordinated management in the Bergen County Vicinage and all those hereinafter filed in or transferred to the Bergen County Vicinage pursuant to the Supreme Court Order dated April 12, 2011 (collectively, "the NJ ASR™ proceedings") and all Defendants and their counsel in the NJ ASR™ proceedings.

2. Each individual Plaintiff shall complete the one-page Plaintiff's Preliminary Disclosure Form, attached as Exhibit A, within thirty (30) days of the date of this Order or within

thirty (30) days of the transfer of any Complaint to this Court. The Plaintiff's Preliminary Disclosure Form shall be served on Plaintiffs' and Defendants' Lead Counsel.

3. The Plaintiff's Preliminary Disclosure Form shall be completed by counsel for the Plaintiff. It is not a verified discovery response. Instead, the Form is designed to obtain information on product identification; the status of any revision, if any; and information the Court finds necessary to assess the need for future discovery.

4. Defendant shall respond to the Plaintiff's Preliminary Disclosure Form within forty-five (45) days to provide whether or not Defendant is in possession of any of the material (explanted device, blood, tissue) from revision surgeries identified in Plaintiff's Preliminary Disclosure Form.

IT IS SO ORDERED.

BRIAN R. MARTINOTTI, J.S.C.

FP01/ 6524552.1

IN RE DEPUY ASR™ HIP IMPLANTS LITIGATION	: SUPERIOR COURT OF NEW JERSEY : LAW DIVISION: BERGEN COUNTY : CASE CODE 293 : : **PLAINTIFF'S PRELIMINARY DISCLOSURE** :

Instructions: Please provide the following information for each individual on whose behalf a claim is being made relating to implantation of the DePuy ASR Hip System. When providing names and addresses please provide the full name and full address, including street number, street name, city, state and zip code.

Caption:		Plaintiff's Attorney & Contact Information:	
Docket No.:			

Name:		Wrongful Death Claim:	Y/N
Address:		Date of Birth:	

Type of Prosthesis:		Product Code/Lot Code:	
Side of Body:	Right / Left / Both (circle one) (Complete one Plaintiff's Preliminary Disclosure form for each implantation surgery involving an ASR product)	Date of Implantation:	
Name and Address of Implanting Surgeon:			
Name and Address of Hospital or Clinic where surgery performed:			

ATTACH MEDICAL RECORDS WITH MANUFACTURER/PRODUCT STICKERS FROM IMPLANTATION SURGERY.

Revision Surgery Scheduled	Y/N	Date of Revision Surgery (if scheduled):	
Imaging Study(ies) Conducted? (eg MRI/CT/ Ultrasound)	Y/N	If yes, list which reports are available:	
Blood Testing Conducted:	Y/N	If yes, list which reports are available:	

Date(s) of Revision Surgery:	
Name(s) and Address(es) of Revision Surgeon(s):	
Name(s) and Address(es) of Revision Surgery Hospital(s):	
Manufacturer(s) and Size(s) of Replacement Device(s):	

Are You in Possession of Explant?	Y/N	Location of Explant:	

Broadspire ID No. (if applicable):	

BY:_____ _____

Attorney for Plaintiff – *INSERT NAME* Dated