SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

IN RE: MIRENA® LITIGATION

CASE NO. 297

This Document Relates to All Actions

MASTER DOCKET NO.: BER-L-4098-13

FILED
SEP 25 2013
BRIAN R. MARTINOTTI
J.S.C.

CASE MANAGEMENT ORDER # 7
RE: SCHEDULE

This matter, having been opened to the Court by counsel for the Parties, and the Parties having consented, stipulated and agreed to the entry of this Case Management Order, and good cause appearing therefore:

IT IS, on this 25 day of September, 2013, hereby **ORDERED** as follows:

1. Defendant shall respond to Plaintiffs' Initial Interrogatories and Requests for Production by September 16, 2013.

2. Defendant shall produce the custodial files of Rusty Thomas, John Rotondo, Brian Groves, William Ahmer, Catherine Holtz, Herm Cukier, Antonio Costales, Leo Plouffe, Edio Zampaglione, Jo-Ann Ruane, Joseph Zuccarini, Fadwa Almanakly, Lynn Carmichael, and Chuck Walsh by October 1, 2013. Defendant will collect and process those files as detailed on pages 5-7 of Exhibit B that was submitted to the Court on August 8, 2013.

3. Pursuant to the Case Management Order entered in the MDL by Judge Seibel, Plaintiffs shall complete 30(b)(6) depositions of Defendant by November 1, 2013 and such depositions shall be Cross-Noticed in the New Jersey Multi County Litigation.

4. Defendant shall produce certain data from databases as summarized on pages 7-9 of Exhibit B by December 1, 2013. This data will not include the plaintiff-specific information

required by the Defense Fact Sheet. Defendant will produce that data pursuant to the deadlines established by the case management order regarding the Defense Fact Sheet.

5. Plaintiff shall serve second wave discovery requests by January 30, 2014.

6. The parties shall select cases for the Initial Disposition Pool on April 4, 2014.

7. All generic discovery shall be completed by September 1, 2014.

8. All case-specific discovery in Initial Disposition Pool cases shall be completed by September 30, 2014.

9. Plaintiffs' generic expert reports are due October 15, 2014.

10. Defendant's generic expert reports are due November 14, 2014.

11. Plaintiffs' case-specific expert reports in Initial Disposition Pool cases are due December 1, 2014.

12. Defendant shall depose Plaintiffs' generic experts between December 1, 2014 and February 2, 2015.

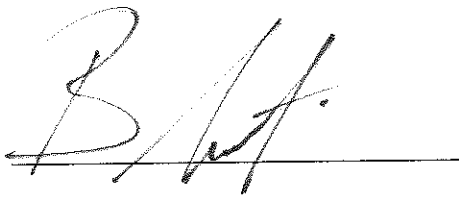
13. Defendant's case-specific expert reports in Initial Disposition Pool cases are due January 15, 2015.

14. Plaintiffs shall depose Defendant's generic experts between February 2, 2015 and March 15, 2015.

15. Defendant shall depose Plaintiffs' case-specific experts in Initial Disposition Pool cases between February 2, 2015 and March 16, 2015.

16. Plaintiffs shall depose Defendant's case-specific experts in Initial Disposition Pool cases between March 1, 2015 and April 15, 2015. Plaintiffs shall not depose Defendant's experts in a case as to which Defendant has not already deposed Plaintiff's case-specific experts.

17. Dispositive motions and *Kemp* motions in Initial Disposition Pool cases are due May 15, 2015.



Honorable Brian R. Martinotti, J.S.C.