	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
JUL 25 2014
BRIAN R. MARTINOTTI
J.S.C.

CASE MANAGEMENT ORDER NO. _7A_

AMENDED SCHEDULING ORDER

The parties having met and conferred and agreed on an Amended Scheduling Order and for good cause shown;

It is on this 25th day of July, 2014

ORDERED that:

1. Defendants will complete production of the previously collected custodial files of the custodians identified in Exhibit 1 by October 15, 2014.

2. Defendants will also make a supplemental production by October 15, 2014. The supplement will include responsive e-mails and associated attachments, sent and/or received by the custodians identified on Exhibits 1 and 2 up to and including August 1, 2014. Productions of former employees who left the company before the previous collection and current employees who have not worked on Mirena since the previous collection will not be supplemented. Defendants will certify the date that a custodian left the company. Defendants will produce these supplemental materials on a rolling basis, to be completed by October 15, 2014.

3. Defendants will also collect supplements up to and including August 1, 2014 for the following non-custodian sources: 1) Investigational New Drug Application ("IND")/New

Drug Application ("NDA") for Mirena; 2) Published and unpublished reports of Defendants' studies involving Mirena; 3) Mirena Adverse Event Data involving reports of perforation, embedment, or migration (this data will be produced in Excel format from Defendants' ARGUS database); and 4) Mirena-related FDA Contact Reports. Starting on September 1, 2014, Defendants will produce these supplemented non-custodial sources on a rolling basis, to be completed by October 15, 2014. Defendants will again collect supplements of the four non-custodial sources identified in this paragraph on February 2, 2015 and every six months thereafter. Production of these non-custodial sources will begin 30 days after collection and will be completed 60 days after collection. The generic discovery completion date in paragraph 6 shall not be applicable to this paragraph.

4. The parties agree that the supplements covered by this Order are the only supplements that Defendants will be required to make absent agreement or a motion and good cause shown by Plaintiffs.

5. Generic discovery shall be completed by April 1, 2015. Plaintiffs may seek discovery beyond this date via agreement of the Parties or through a motion and good cause shown by Plaintiffs.

6. Case-specific discovery in IDP cases shall be completed by April 30, 2015.

7. Each side shall select three of the IDP cases for trial and identify its selections by email to the Court and opposing counsel by 4 p.m. Eastern on May 6, 2015. Each side shall exercise one veto from the other side's selections and inform the Court of such by email by 4 p.m. Eastern on May 13, 2015. Nothing in this order shall prevent dispositive motions from being filed in cases that are not selected for trial.

8. Plaintiffs' generic expert reports are due May 18, 2015. An expert who is offering generic as well as case-specific opinions must submit a generic expert report on this date.

9. Defendants' generic expert reports are due June 22, 2015. An expert who is offering generic as well as case-specific opinions must submit a generic expert report on this date.

10. Plaintiffs' case-specific expert reports for the cases selected for trial are due June 15, 2015.

11. Defendants' case-specific expert reports for the cases selected for trial are due July 15, 2015.

12. The parties shall conduct expert depositions between July 20, 2015 and October 2, 2015. Plaintiffs shall not depose any generic defense expert on a topic as to which Defendants have not already deposed Plaintiffs' generic expert(s). Plaintiffs shall not depose any defense expert on a case as to which Defendants have not already deposed Plaintiffs' case-specific expert(s).

13. *Kemp* motions are due by October 15, 2015. Opposition briefs are due by November 16, 2015. Reply briefs are due by December 4, 2015.

14. Dispositive motions for cases selected for trial are due by November 17, 2015. Opposition briefs are due by December 8, 2015. Reply briefs are due by December 22, 2015.

15. Oral arguments ~~on the dispositive and *Kemp* motions will be heard~~ will be set at a CMC in November 2015. _____, ~~2016.~~

16. The Court will select the first trial setting, ~~which will be scheduled for~~ at a CMC in November 2015. ~~2016.~~

HONORABLE BRIAN R. MARTINOTTI, J.S.C.

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Exhibit 1

1) Russell Barrans
2) Beth Bell
3) Guy Graziano
4) Vladimir Hanes
5) Petra Koelm
6) Eeva Lukkari-Lax
7) Verena Ottley
8) William Shank
9) Sam Trujillo

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Exhibit 2

1) William "Rusty" Thomas
2) John Rotondo
3) Brian Groves
4) William Ahmer
5) Catherine Holtz
6) Herman Cukier
7) Antonio Costales
8) Leo Plouffe
9) Edio Zampaglione
10) Jo-Ann Ruane
11) Joseph Zuccarini
12) Fadwa Almanakly
13) Lynn Carmichael
14) Charles Walsh
15) Nada Glavan
16) Allyson Andrakanich
17) John Talian
18) Shurti Gadhia
19) Pirjo Sallinen
20) Carol Ann Wilson
21) Ilka Schellschmidt
22) Hannu Allonen
23) Kimmo Jaakkola
24) Terhi Lehtinen
25) Paul Korner
26) Alexander Prezioso
27) Sharon Brown
28) Nancy Konnerth
29) Marie Foegh
30) Richard Lynen
31) Marty Grill