

IN RE: BARD IMPLANTED PORT  
CATHETER PRODUCTS LIABILITY  
LITIGATION

**FILED**  
**AUG 13 2025**  
**GREGG A. PADOVANO, J.S.C.**

: SUPERIOR COURT OF NEW JERSEY,  
: LAW DIVISION – BERGEN COUNTY  
:  
: MCL CASE NO. 640  
: MASTER DOCKET NO. BER-L-2403-25  
:  
: CIVIL ACTION  
:  
: CASE MANAGEMENT ORDER NO. 3  
: (All prior orders remain in effect except as modified  
: by this Order).  
:

**THIS MATTER** having come before the Court by way of a Case Management Conference conducted on May 19, 2025; and this Court, having conferred with counsel on that date, and for good cause shown,

IT IS on this 13<sup>TH</sup> DAY OF August 2025, ORDERED:

1. **Lead and Liaison Counsel Appointments.** ~~This Court hereby appoints the~~ *THE PARTIES AGREE THAT THE*

following attorneys as Lead Counsel for Plaintiffs:

Michael A. Galpern  
**JAVERBAUM WURGAFT HICKS**  
**KHAN WIKSTROM AND SININS, P.C.**  
1000 Haddonfield-Berlin Road, Ste. 203  
Voorhees, NJ 08043  
Telephone: (856) 596-4100  
Facsimile: (856) 702-6640  
mgalpern@lawjw.com

Jennifer Elwell  
**BERGER MONTAGUE PC**  
1818 Market Street, Suite 3600  
Philadelphia, PA 19103  
Telephone: (215) 875-3000  
Facsimile: (215) 875-4620  
jelwell@bm.net

Christopher J. Geddis  
**MAZIE SLATER KATZ & FREEMAN,**  
**LLC**  
103 Eisenhower Parkway  
Roseland, NJ 07068  
Telephone: (973) 228-9898  
Facsimile: (973) 228-0303  
cgeddis@mazieslater.com

*THE PARTIES AGREE THAT*  
This Court hereby appoints the following attorney as Defendants' Liaison Counsel:


Edward J. Fanning, Jr.  
**McCARTER & ENGLISH, LLP**  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102  
Telephone: (973) 622-4444  
Facsimile: (973) 624-7070  
efanning@mccarter.com

2. **Appearance Pro Hac Vice.** This Court hereby **VACATES** Paragraph 9(a) of the Court's Initial Case Management Order dated April 8, 2025 limiting appearances pro hac vice to three (3) counsel per party in each action.

3. **Master Pleadings.** The parties shall continue to meet and confer regarding the form and submission of master pleadings. At the next conference, the parties shall confirm the date by which the parties will provide the Court with proposed case management order that (a) encloses the Master Complaint, the template of a short-form complaint, and the Master Answer; (b) provides that the Master Complaint and Master Answer will be filed on the master docket in this MCL; and (c) sets forth the procedures related to the filing of short-form complaints and Defendants' answers thereto. In the event that there are disputes over master pleadings, the parties shall raise those issues with the Court.

4. **Protective Order and Preservation Order.** The parties shall continue to meet and confer regarding the form and submission of a proposed Protective Order and Preservation Order for the Court's entry.

5. **Next Conference.** All parties shall appear for the second formal conference with the undersigned on July 22, 2025 at 2:00 p.m. Counsel shall submit an agenda for the Case Management Conference seven (7) days prior by email to Mark McLaughlin at *MICHAEL VALENTE AT MICHAEL.VALENTE@NJ COURTS.GOV* mark.mclaughlin@njcourts.gov and to Judge Padovano at Gregg.padovano@njcourts.gov.



**HON. GREGG A. PADOVANO, J.S.C.**