
IN RE: PELVIC

MESH/GYNECARE LITIGATION

FILED
APR 22 2025
GREGG A. PADOVANO, J.S.C.

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION: BERGEN COUNTY

CASE NO. 291

MASTER DOCKET NO.: BER-L-11575-14

CIVIL ACTION

CASE MANAGEMENT ORDER #119 -
UPDATED DISCOVERY COMPLETION
ORDER REGARDING CERTAIN CMO 105
ACTIVATED CASES.

All prior orders remain in full force and
effect except as modified by this Order.

IT IS on this 22ND day of April 2025, **ORDERED** as follows:

- I. **DISCOVERY DEADLINES FOR CMO 105 CASES LISTED ON THE ATTACHED EXHIBIT A.**
 - A. Except as otherwise governed by CMOs 95 (regarding friends/family) and 97 (regarding sales reps), any outstanding fact discovery will be completed by August 15, 2025.

B. Expert Discovery

- (i) Plaintiffs are to advise Defendants if the plaintiff has or intends to submit to an IME by plaintiffs' case specific expert by *August 11, 2025*, which expert will be conducting the exam, and whether a pelvic exam will be performed.
- (ii) Plaintiffs are to provide Defendants with possible dates between *September 19, 2025* and *October 8, 2025* when the plaintiff can travel for a DME to be conducted by Defendants' experts by *October 8, 2025*. Defendants will then send plaintiffs' counsel an email confirming the name of the defense expert, his or her qualifications, the location, date and time of the DME. This information will then be formalized in a Notice for DME that complies with the New Jersey Court Rules. If Plaintiff objects to any aspect of the proposed DME, those objections can be raised with the Court by letter if there is no resolution after meeting and conferring with Defendants.
- (iii) Plaintiff expert report(s) shall be served by *September 19, 2025*. If Plaintiffs fail to serve all expert reports by the deadline without having obtained prior leave of the Court, the case may be dismissed with prejudice.
- (iv) Defense expert reports shall be served by *October 17, 2025*.
- (v) Parties shall make best efforts to complete all necessary plaintiff expert depositions by *November 14, 2025* and all necessary defense expert depositions by *December 12, 2025*. Plaintiff's experts will not be deposed until after receipt of the defense expert reports and the notes of all DME's. Defense expert depositions will not be conducted until after completion of plaintiff expert depositions.
- (vi) Expert discovery shall be completed by *December 12, 2025*.

C. Pre-Trial Motions

- (i) Pretrial motions other than *in limine* (dispositive, Kemp/ Accutane) shall be served by *January 9, 2026*. Consistent with the practice in this MCL, the original motion papers shall be submitted directly to the trial judge's chambers. Only Notices of Motion and Forms of Order shall be submitted for filing with the Clerk's office (either via JEDS or in hard copy).

- (ii) Oppositions to pre-trial motions shall be filed and served by *February 6, 2026*.
- (iii) Replies shall be filed and served by *February 27, 2026*.
- (iv) Oral argument on pre-trial motions and any remaining outstanding disputed deposition designations shall commence on **[To be determined by later order of the Court]**, continuing day to day as necessary.
- (v) The court shall issue rulings on pretrial motions and any outstanding deposition designation disputes that impact opening statements, or other such issues that must be resolved prior to opening statements by no later than **[To be determined by later order of the Court]**.

Any case that fails to meet any of the deadlines for discovery in this order without good cause or consent of the opposing party shall not be considered a candidate for the next trial setting.

II. CMO 105 CASES NOT LISTED ON EXHIBIT A.

Plaintiffs' counsel for any CMO 105-activated case that is not listed on Exhibit A may contact defense liaison counsel (Kcrawford@riker.com) to meet and confer regarding case work up and scheduling issues.



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

EXHIBIT A

In re Pelvic Mesh/ Gynecare MCL

(Current active CMO 105 cases that should be in active records collection and beginning to schedule depositions)

| | Plaintiff/Case Name | Docket # | PL Firm(s) |
|----|-------------------------------------|-----------------|--|
| 1 | Anderson, Jacqueline and Michael | BER-L-001904-23 | Motley Rice New Jersey, LLC; Wagstaff Law Firm |
| 2 | Baisch-Ricker, Kristin | BER-L-000298-24 | Schroeder Law Office, PLLC Karen Schroder that this was a Bossier case when served the SFAs |
| 3 | Bakaj, Deborah | BER-L-002735-23 | Anapol Weiss |
| 4 | Bible, Violetta | BER-L-006845-22 | Bailey & Glasser, LLP; Cohen Placitella & Roth, PC |
| 5 | Biller, Lisa | BER-L-0950-24 | Schroeder Law Office, PLLC |
| 6 | Boudreaux, Terrie | BER-L-4331-24 | Schroeder Law Office, PLLC |
| 7 | Britt, Vicki | BER-L-5026-24 | Schroeder Law Office, PLLC |
| 8 | Bryant, Katharine | BER-L-014435-14 | Cohen Placitella; Roth, PC; Taylor Martino, PC |
| 9 | Bunn, Jodi | BER-L-1202-24 | Anapol Weiss |
| 10 | Cardenas, Connie | BER-L-005204-22 | Motley Rice New Jersey, LLC; Wagstaff Law Firm |
| 11 | Carrillo, Kimberly | BER-L-4197-24 | Schroeder Law Office, PLLC |
| 12 | Chiofalo, Gail | BER-L-005652-23 | Schroeder Law Office, PLLC |
| 13 | Colon, Marilyn | BER-L-4308-23 | Stark & Stark |
| 14 | Conn, Janice | BER-L-1300-24 | Cohen Placitella & Roth, PC |
| 15 | Cooper, Charlene | BER-L-4466-24 | Schroeder Law Office, PLLC |
| 16 | Doyle, Dianna | BER-L-005205-22 | Motley Rice New Jersey, LLC; Wagstaff Law Firm |
| 17 | Duley, Susan | BER-L-157-25 | Schroeder Law Office, PLLC |
| 18 | Eliot-Johnson, Dawn and Christopher | BER-L-7271-24 | Anapol Weiss |
| 19 | Franke, Jacalyn | BER-L-7971-19 | Schroeder Law Office |
| 20 | Garcia, Maria and Angel | BER-L-013433-14 | Simonson Hess Leibowitz & Goodman, PC Order relieving Cohen Placitella as Counsel Entered 8/28/13 |
| 21 | Gibilisco, Deborah and Benedict | BER-L-013132-14 | Parker Waichman, LLP |
| 22 | Godsey, Vicki Sue | BER-L-004309-23 | Bailey & Glasser, LLP; Cohen Placitella & Roth, PC |
| 23 | Gore, Marion and Raymond | BER-L-011110-14 | Cohen Placitella; Roth, P.C. |

| | Plaintiff/Case Name | Docket # | PL Firm(s) |
|----|-------------------------------|-----------------|--|
| 24 | Harley, Judith | BER-L-25-25 | Cohen Placitella & Roth, PC |
| 25 | Harrill, Barbara and James | BER-L-006460-23 | Anapol Wiess |
| 26 | Harrington, Kristin | BER-L-7126-24 | Schroeder Law Office, PLLC |
| 27 | Haskins, Wendy | BER-L-3173-24 | Anapol Wiess |
| 28 | Hazelwood, Laura | BER-L-4836-24 | Schroeder Law Office, PLLC |
| 29 | Hilligoss, Gweneth | BER-L-6893-24 | Schroeder Law Office, PLLC |
| 30 | Holler, Barbara | BER-L-005539-23 | Anapol Wiess |
| 31 | Huxtable, Gena and Richard | BER-L-006705-22 | Motley Rice New Jersey, LLC |
| 32 | Jackson, Linda | BER-L-5872-24 | Schroeder Law Office, PLLC |
| 33 | Jaramillo, Julia | BER-L-337-25 | Schroeder Law Office, PLLC |
| 34 | Johnson, Finesha | BER-L-1492-24 | Cohen Placitella & Roth, PC |
| 35 | Johnson, Tori | BER-L-3236-24 | Anapol Wiess |
| 36 | Jordan, Carmen | BER-L-5823-24 | Schroeder Law Office, PLLC |
| 37 | Koberger, Julie | BER-L-5682-24 | Schroeder Law Office, PLLC |
| 38 | Laneve, Janet | BER-L-003537-23 | Schroeder Law Office, PLLC; Bossier |
| 39 | Lemoine, Randi | BER-L-1180-24 | Schroeder Law Office, PLLC |
| 40 | Mason, Kelli | BER-L-4778-24 | Cohen Placitella & Roth, PC |
| 41 | McCabe, Kathy Lynn and Ronald | BER-L-000080-23 | Bailey & Glasser, LLP; Cohen Placitella & Roth, PC |
| 42 | McCallum, Angela | BER-L-1194-25 | Schroeder Law Office, PLLC |
| 43 | McDaniel, Christy | BER-L-005653-23 | Javerbaum Wurgalt Hicks Kahn Wikstrom & Sinins, PC Flint Cooper? |
| 44 | Mead, Judith | BER-L-3816-24 | Cohen Placitella & Roth, PC |
| 45 | Mizsak, Deana | BER-L-6044-23 | Stark & Stark |
| 46 | Mosley, Gwendolyn (KY) | BER-L-000739-23 | Schroeder Law Office, PLLC |
| 47 | Nash, Angel | BER-L-1491-24 | Cohen Placitella & Roth, PC |
| 48 | Nicholes, Susan | BER-L-000572-24 | Schroeder Law Office, PLLC Karen Schroder that this was a Bossier case when served the SFAs |
| 49 | O'Brien, Janet | BER-L-7280-24 | Stark & Stark |
| 50 | Ohana, Solange | BER-L-006513-22 | Motley Rice New Jersey, LLC; Wagstaff Law Firm |
| 51 | Ortega-Melendez, Tiffany | BER-L-1275-24 | Cohen Placitella & Roth, PC |
| 52 | Parker, Davina | BER-L-1719-24 | Schroeder Law Office, PLLC |
| 53 | Pena, Emilys | BER-L-414-25 | Schroeder Law Office, PLLC |
| 54 | Pons, Elizabeth | BER-L-000467-23 | Bailey & Glasser, LLP; Cohen Placitella & Roth, PC |

| | Plaintiff/Case Name | Docket # | PL Firm(s) |
|----|---|-----------------|--|
| 55 | Prudente, Jennifer and Michael | BER-L-014083-14 | Cohen, Placitella & Roth; Motley Rice (Green, Vincent L.) Notice of Appearance (NOA) of Messa, Joseph Jr. Filed 9/26/24: Messa & Associates |
| 56 | Quinn, Erin | BER-L-1303-24 | Anapol Weiss |
| 57 | Rasmussen, Patricia | BER-L-1803-24 | Schroeder Law Office, PLLC |
| 58 | Rathert, Stephane | BER-L-3276-24 | Schroeder Law Office, PLLC |
| 59 | Richmond, Summer and Valladares, Melvin | BER-L-3274-24 | Anapol Weiss |
| 60 | Rideaux, Jacqueline | BER-L-6359-24 | Schroeder Law Office, PLLC |
| 61 | Rudo, Melissa | BER-L-2475-24 | Schroeder Law Office, PLLC |
| 62 | Salazar, Sharhonda and Joshua | BER-L-1095-24 | Anapol Weiss |
| 63 | Sands, Clara | BER-L-1448-24 | Anapol Weiss |
| 64 | Schultz, Lori | BER-L-004310-23 | Bailey & Glasser, LLP; Cohen Placitella & Roth, PC |
| 65 | Schwasinger, Jacquelyn | BER-L-4780-24 | Cohen Placitella & Roth, PC |
| 66 | Segura, Roselyn (aka Garcia, Roselyn) | BER-L-003538-23 | Schroeder Law Office, PLLC |
| 67 | Shirrel, Cynthia | BER-L-6343-23 | Stark & Stark |
| 68 | Shoop, Kimberly and Brian | BER-L-3377-24 | Anapol Weiss |
| 69 | Sierra, Sharlene | BER-L-2960-20 | Schroeder Law Office |
| 70 | Sotomayor, Mary Ann and Alex | BER-L-005107-23 | Motley Rice New Jersey, LLC Wagstaff Law Firm |
| 71 | Spliedt, Corinne | BER-L-000741-23 | Schroeder Law Office, PLLC |
| 72 | Steiner, Katherine | BER-L-5888-23 | Stark & Stark |
| 73 | Stiers, Ralinda | BER-L-015352-14 | Bernstein Liebhard LLP; Law Offices of Jan Meyer & Associates, PC; Herman Gerel, LLP |
| 74 | Stoffregen, Vivian | BER-L-6410-23 | Stark & Stark |
| 75 | Stone, Lisa | BER-L-005764-23 | Cohen Placitella & Roth, PC |
| 76 | Trahan, Kimberly and Daniel | BER-L-001907-23 | Motley Rice New Jersey, LLC; Wagstaff Law Firm |
| 77 | Trainer, Linda and Mark | BER-L-014104-14 | Cohen Placitella; Roth, PC; Motley Rice, LLC |
| 78 | Trice, Tasha | BER-L-6162-23 | Stark & Stark |
| 79 | Tucker, Dana | BER-L-728-25 | Schroeder Law Office, PLLC |
| 80 | Tucker, Evelyn | BER-L-002234-23 | Bossier & Associates; Schroeder Law Office, PLLC |
| 81 | Twomey, Kimberly | BER-L-006943-23 | Schroeder Law Office, PLLC |
| 82 | Usitalo, Gretchen | BER-L-005844-23 | Schroeder Law Office, PLLC |

| | Plaintiff/Case Name | Docket # | PL Firm(s) |
|----|----------------------------|-----------------|----------------------------|
| 83 | Viramontes, Leonor | BER-L-3460-24 | Schroeder Law Office, PLLC |
| 84 | Walker, April | BER-L-4835-24 | Schroeder Law Office, PLLC |
| 85 | Yoder, Tracy and Allan | BER-L-002163-23 | Anapol Weiss |