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**FILED**

**JUL 25 2025**

**CRISTINA A. PADOVANO, J.S.C.**

JENNIFER PRUDENTE and MICHAEL  
PRUDENTE,

Plaintiffs,

vs.

ETHICON, INC., ETHICON WOMEN'S  
HEALTH AND UROLOGY, a Division of  
ETHICON, INC., GYNECARE, JOHNSON &  
JOHNSON, and JOHN DOES 1-20 (fictitious),  
and JANE DOE CORPORATIONS 21-40,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION, BERGEN COUNTY  
DOCKET NO. BER-L-14083-14

MASTER DOCKET NO. BER-L-11575-14

CIVIL ACTION

In Re Pelvic Mesh/Gynecare Litigation  
Case No. 291

**ORDER TO EXTEND CMO 119  
DEADLINES**

**THIS MATTER**, having been brought before the Court Defendants Ethicon, Inc. and  
Johnson & Johnson, through their counsel Riker Danzig LLP, and for good cause shown;

**IT IS ON THIS** 25<sup>TH</sup> day of JULY, 2025;

**ORDERED**, that this matter shall no longer be subject to the deadlines applicable to  
CMO 105-activated cases as per CMO 119. The updated deadlines are as follows:

**I. DISCOVERY DEADLINES.**

- A.** Except as otherwise governed by CMOs 95 (regarding friends/family) and  
97 (regarding sales reps), any outstanding fact discovery will be  
completed by October 31, 2025. The parties shall set a firm date for the  
deposition of Dr. Culligan to be completed before October 1, 2025. Dr.  
Conner's deposition shall proceed on September 17, 2025, preferably in  
person.

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 *October 14, 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 *December 1, 2025* and *January 23, 2026* when the plaintiff can travel for a DME to be conducted by Defendants' experts by *January 23, 2026*. 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 *December 1, 2026*. 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 *January 30, 2026*.
- (v) Parties shall make best efforts to complete all necessary plaintiff expert depositions by *February 27, 2026* and all necessary defense expert depositions by *March 13, 2026*. 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 *March 13, 2026*.

C. Pre-Trial Motions

- (i) Pretrial motions other than *in limine* (dispositive, Kemp/ Accutane) shall be served by *April 24, 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 *May 22, 2026*.
- (iii) Replies shall be filed and served by *June 12, 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.



Hon. Gregg A. Padovano, J.S.C.