

SUPERIOR COURT OF NEW JERSEY

IN RE: PELVIC

LAW DIVISION: BERGEN COUNTY

MESH/GYNECARE LITIGATION

CASE NO. 291

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

CIVIL ACTION

CASE MANAGEMENT ORDER #129 -
UPDATED DISCOVERY
COMPLETION ORDER REGARDING
CERTAIN ACTIVATED CASES

FILED

APR 06 2026

GRETA P. PICHON, J.S.C.

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

IT IS on this 6th day of April 2026, ORDERED as follows:

I. DISCOVERY DEADLINES.

A. Except as otherwise governed by CMOs 95 (regarding friends/family) and 97 (regarding sales reps), and outstanding fact discovery will be completed by August 14, 2026.

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 10, 2026*, 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 14, 2026* and *October 5, 2026* when the plaintiff can travel for a DME to be conducted by Defendants' experts by *October 5, 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 *September 14, 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 *October 12, 2026*.
- (v) Parties shall make best efforts to complete all necessary plaintiff expert depositions by *November 9, 2026* and all necessary defense expert depositions by *December 7, 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 *December 7, 2026*.

C. Pre-Trial Motions

- (i) Pretrial motions other than *in limine* (dispositive, Kemp/ Accutane) shall be served by *January 8, 2027*. 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 5, 2027*.
- (iii) Only when necessary, on leave of Court, limited replies shall be filed and served by *February 26, 2027*.
- (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. CASES NOT LISTED ON EXHIBIT A.

Plaintiffs' counsel for any currently 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

Adkins, Jean	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014741-14
Altice, Christina	Andrus Wagstaff; Sanders Viener Grossman	BER-L-012262-14
Anderson, Linda & Howard	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014739-14
Anderson, Shirley Ann & David	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014730-14
Ast, Ruby	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014725-14
Barber, Wendi & Donald	Andrus Wagstaff; Sanders Viener Grossman	BER-L-012412-14
Barney, Heather & Reed	Anapol Weiss	BER-L-004312-23
Beal, Jennifer	Anapol Weiss	BER-L-003101-23
Brown, Chantal	Anapol Weiss	BER-L-004658-25
Bunn, Jodi	Anapol Weiss	BER-L-1202-24
Diaz-Ortiz, Ramonita	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014771-14
Eby, Shirley	Sanders Viener Grossman	BER-L-016222-14
Estrada, Connie	Andrus Wagstaff; Sanders Viener Grossman	BER-L-011962-14
Fillion-Reznick, Marsha	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014854-14
Gosen, Doris R.	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014815-14
Griffin, Vaneselle	Motley Rice, LLC; Wagstaff Law Firm	BER-L-001284-23
Grooms, Nancy	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014799-14
Guillette, Germaine	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014797-14
Hale, Tina	Motley Rice; Wagstaff & Cartmell	BER-L-006043-23
Haubrich, Lynn	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014970-14
Jewell, Holly	Andrus Wagstaff; Sanders Viener Grossman	BER-L-014869-14
Newman, Cheryl & Clifford	Motley Rice; Wagstaff & Cartmell	BER-L-002795-23
Ohana, Solange	Motley Rice, LLC; Wagstaff Law Firm	BER-L-006513-22

Perez, Dorinda & Diego	Andrus Wagstaff; Sanders Viener Grossman	BER-L-015052-14
Polk, Aleah	Andrus Wagstaff; Sanders Viener Grossman	BER-L-015034-14
Porter, Dianne	Andrus Wagstaff; Sanders Viener Grossman	BER-L-015033-14
Reed, Donnette & Austin	Andrus Wagstaff; Sanders Viener Grossman	BER-L-011651-14
Reynolds, Pamm & Keith	Milberg Coleman Bryson Phillips Grossman PLLC	BER-L-011146-14
Ritchie, Pamela	Milberg Coleman Bryson Phillips Grossman PLLC	BER-L-015028-14
Rosales, Florence	Andrus Wagstaff; Sanders Viener Grossman	BER-L-015020-14
Sierra, Sharlene	Johnson Law Group	BER-L-002960-20
Spivey, Jeriylea	Motley Rice, LLC; Wagstaff Law Firm	BER-L-001423-23

4905-0166-9789, v. 2