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FILED
AUG 18 2025
GREGG A. PADOVANO, J.S.C.

IN RE PELVIC MESH/GYNECARE
LITIGATION

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, BERGEN COUNTY
MASTER DOCKET NO. BER-L-011575-14
CIVIL ACTION
Case No. 291
**ORDER TO EXTEND CMO 119
DEADLINES FOR CERTAIN CMO-105
ACTIVATED CASES**

THIS MATTER, having been brought before the Court by Plaintiffs' request, through their counsel Bailey & Glasser, LLP, and for good cause shown;

IT IS ON THIS 18TH day of AUGUST, 2025; **ORDERED**, that the matters listed on the attached Exhibit A 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 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 September 15, 2025.

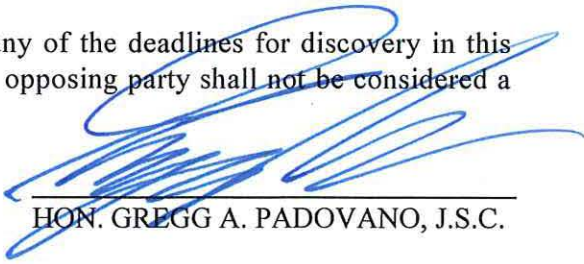
B. Expert Discovery

- (i) Plaintiffs are to advise Defendants if the plaintiff has or intends to submit to an IME by plaintiffs' case specific expert by *September 15, 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 *October 17, 2025* and *November 10, 2025* when the plaintiff can travel for a DME to be conducted by Defendants' experts by *December 10, 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 *October 17, 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 *November 21, 2025*.
- (v) Parties shall make best efforts to complete all necessary plaintiff expert depositions by *December 19, 2025* and all necessary defense expert depositions by *January 23, 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 *January 23, 2026*.

C. Pre-Trial Motions

- (i) Pretrial motions other than *in limine* (dispositive, Kemp/ Accutane) shall be served by *February 13, 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 *March 13, 2026*.
- (iii) Replies shall be filed and served by *April 3, 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.

Exhibit A

1	Bible, Violetta	BER-L-006845-22	Cohen Placitella and Bailey Glasser
3	Godsey, Vicki	BER-L-004309-23	Cohen Placitella and Bailey Glasser
4	McCabe, Kathy	BER-L-000080-23	Cohen Placitella and Bailey Glasser
5	Pons, Elizabeth	BER-L-000467-23	Cohen Placitella and Bailey Glasser
6	Stone, Lisa	BER-L-005764-23	Cohen Placitella and Bailey Glasser

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