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FILED

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GREGG A. PACOVANO, J.S.C.

Attorneys for Defendants,  
Ethicon, Inc. and Johnson & Johnson

DEBORAH BAKAJ,

Plaintiff,

vs.

ETHICON, INC., ETHICON WOMEN'S  
HEALTH AND UROLOGY, a Division of  
Ethicon, Inc., GYNECARE, JOHNSON &  
JOHNSON, AND JOHN DOES 1-20,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION- BERGEN COUNTY  
DOCKET NO. BER-L-002735-23

MASTER DOCKET NO. BER-L-011575-14

CIVIL ACTION

In Re Pelvic Mesh/Gynecare Litigation,  
Case No. 291

**ORDER TO FURTHER EXTEND  
DEADLINES**

**THIS MATTER**, having been brought before the Court by the parties, through their respective counsel, and for good cause shown:

IT IS ON THIS 6<sup>TH</sup> day of APRIL, 2026, **ORDERED**, that this matter shall no longer be subject to the deadlines entered by this Court in Amended CMO #123. 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 *July 17, 2026*.
- B. Expert Discovery

- (i) The parties will meet and confer to reschedule the Plaintiff's DME, to which plaintiff will travel. Any inability to agree may be resolved by joint letter submission to the Court.
- (ii) Plaintiff expert report(s) shall be served by *August 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.
- (iii) Defense expert reports shall be served by *September 11, 2026*.
- (iv) Parties shall make best efforts to complete all necessary plaintiff expert depositions by *October 12, 2026*, and all necessary defense expert depositions by *November 9, 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.
- (v) Expert discovery shall be completed by *November 9, 2026*.

C. Pre-Trial Motions

- (i) Pretrial motions other than *in limine* (dispositive, Kemp/ Accutane) shall be served by *December 7, 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 *January 4, 2027*.
- (iii) Replies shall be filed and served by *January 25, 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.

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

**THE UNDERSIGNED CONSENT TO THE FORM AND ENTRY OF THIS ORDER:**

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By: /s/ Catelyn McDonough<sup>1</sup>

By: /s/ Kelly S. Crawford<sup>1</sup>

Dated: March 24, 2026

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<sup>1</sup> Pursuant to the New Jersey Supreme Court Omnibus Order on Covid-19 issues entered on March 27, 2020, "The provisions of Rule 1:32-2A(c) and all other Court Rules requiring original signatures on filings are relaxed and supplemented so as to permit electronic signatures to be used in all filing processes temporarily authorized to be used during COVID-19 crisis, including, but not limited to emergency applications, submitted by email and hardcopy submissions in dockets without an approved electronic filing system... ."