

Kelly S. Crawford, Esq.  
RIKER DANZIG LLP  
7 Giralda Farms, Suite 250  
Madison, NJ 07940-1051  
(973) 538-0800

Attorneys for Defendants  
Ethicon, Inc. and Johnson & Johnson

**FILED**  
DEC 11 2025  
GREGG A. PADOVANO, J.S.C.

SUMMER RICHMOND and MELVIN  
VALLADARES, w/h,

Plaintiffs,

vs.

ETHICON, INC., et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – BERGEN COUNTY  
DOCKET NO. BER-L-003274-24-MCL

MASTER CASE NO. BER-L-11575-14

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

**ORDER GRANTING DEFENDANTS'  
MOTION TO EXTEND DISCOVERY**

THIS MATTER having been brought before the Court by Defendants Ethicon, Inc. and Johnson & Johnson, through its counsel Riker Danzig LLP, seeking an Order Extending Discovery; and the Court having considered the Motion, any opposition filed with respect to the Motion, and any arguments of counsel; and for good cause shown,

IT IS on this 11<sup>TH</sup> day of DECEMBER, 2025,

ORDERED that Defendants' Motion to Extend Discovery, has been granted and the new deadlines are as follows:

- A. Except as otherwise governed by CMOs 95 (regarding friends/family) and 97 (regarding sales reps), any outstanding fact discovery will be completed by December 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 *December 12, 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 *January 19, 2026* and *February 10, 2026* when the plaintiff can travel for a DME to be conducted by Defendants' experts by *February 10, 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 *January 19, 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 *February 23, 2026*.
- (v) Parties shall make best efforts to complete all necessary plaintiff expert depositions by *March 23, 2026* and all necessary defense expert depositions by *April 17, 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 *April 17, 2026*.

**C. Pre-Trial Motions**

- (i) Pretrial motions other than *in limine* (dispositive, Kemp/ Accutane) shall be served by *May 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 *June 15, 2026*.
- (iii) Replies shall be filed and served by *July 7, 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]**.

Should any of the deadlines for discovery in this order not be met without good cause or consent of the opposing party, the case shall not be considered a candidate for the next trial setting.

  
\_\_\_\_\_  
Hon. Gregg A. Padovano

\_\_\_\_ Opposed

☒ Unopposed

The Court's findings of fact and conclusions of law were placed on the record on the \_\_\_\_\_  
day of \_\_\_\_\_, 2025 and were:

\_\_\_\_ Written

\_\_\_\_ Oral