

JOSEPH J. BROWN,  
Plaintiff,

vs.

MONSANTO COMPANY, et al.,  
Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – BERGEN COUNTY

DOCKET NO.: BER-L-4343-25

Civil Action

**FILED**

AUG 22 2025

GREGG A. PADOVANO, J.S.C.

**CONSENT ORDER STAYING DISCOVERY  
PENDING CASE MANAGEMENT ORDER**

Plaintiff Joseph J. Brown and Defendants Monsanto Company, Bayer Corporation, Bayer U.S. LLC, and Bayer CropScience LP (“Defendants”), through their respective counsel, stipulate as follows:

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel that:

1. On May 28, 2025, the Supreme Court granted a request made by Plaintiff – and plaintiffs in other matters regarding the use of Roundup Products – to designate such matters as multicounty litigation (“MCL”) pursuant to Court Rule 4:38 for centralized management purposes.
2. Due to the Supreme Court’s Order, the parties agree that discovery should be stayed in the above-captioned matter until a Case Management Conference (“CMC”) is scheduled and a Case Management Order (“CMO”) is entered in the newly formed MCL, which will establish the parameters and deadlines of discovery applicable across all cases managed under the newly-formed MCL;
3. The parties will work together in good faith to establish the parameters and deadlines of discovery with the Court given the establishment of a MCL;
4. The discovery deadline currently set for August 28, 2025, is hereby stayed pending the entry of a CMO in the MCL, which will set new dates and deadlines in the above-captioned matter; and

5. The undersigned counsel of record hereby indicates their consent to the form and entry of this Order.

Dated: August 19, 2025

**WEITZ & LUXENBERG, PC**

s/ James Bilsborrow  
James Bilsborrow (382552021)

*Attorney for Plaintiff*

Dated: August 22, 2025

**DLA PIPER LLP (US)**

s/ Stephen C. Matthews  
Stephen C. Matthews (055801994)

*Attorney for Defendants Monsanto Company, Bayer Corporation, Bayer U.S. LLC, Bayer CropScience LP, and Bayer CropScience LLC*

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