

WILLIAM CAPOBIANCO,
Plaintiff,

vs.

MONSANTO COMPANY, et al.,
Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – BERGEN COUNTY

DOCKET NO.: BER-L-4370-25

Civil Action

FILED
AUG 22 2025
GREGG A. PADOVANO, J.S.C.
CONSENT ORDER STAYING DISCOVERY
PENDING CASE MANAGEMENT ORDER

Plaintiff William Capobianco 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 September 12, 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



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