

JOSEPH CARUSO,

Plaintiff,

vs.

MONSANTO COMPANY, et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – BERGEN COUNTY

DOCKET NO.: BER-L-4379-25

Civil Action

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

AUG 22 2025

GREGG A. PADOVANO, J.S.C.

Plaintiff Joseph Caruso 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 November 30, 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.