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IN RE TALC BASED POWDER PRODUCT  
LITIGATION

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ATLANTIC COUNTY

CASE NO.: 300

CIVIL ACTION

**CASE MANAGEMENT ORDER 19 – ORDER  
GOVERNING AMENDMENTS TO  
COMPLAINTS**

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This matter having come before the Court upon the application of the Parties, and the Court  
having reviewed the matter,

IT IS ON THIS 15<sup>th</sup> day of May, 2025,

**ORDERED THAT:**

The procedures set forth below shall govern the amendment of existing complaints to add new  
defendants (section A) and the amendment of complaints to substitute plaintiffs (section B)

**A. Amendment of Complaints to Add New Defendants**

1. Plaintiffs are hereby granted leave to file Amended Complaints to add new Defendants  
without further motion to the court provided that:

a. Each Plaintiff's firm serve a single copy of their proposed Amended Complaint  
to defense counsel, Jessica Brennan, Esquire, along with a proposed consent order in the form attached as  
Exhibit A, before filing with the Court;

b. Each Plaintiff's firm send a list of all cases it intends on filing an Amended  
Complaint with the Court, Terms and Numbers to defense counsel, Jessica Brennan, Esquire, before filing  
with the Court;

c. Defendants will review the Amended Complaint and consent order within seven  
(7) days of receipt. After Defendants have reviewed and approved of the Amended Complaint and

consent order, each Plaintiff's firm may then file the agreed upon Consent Order with the proposed Amended Complaint and list of all the cases to which the Amended Complaint applies.

2. The foregoing does not apply to any of the 15 cases selected for the Discovery Pool in accordance with the Third Amended Case Management Order 9 and listed in Case Management Order 22.

3. Defendants are not required to file an Answer to any Amended Complaints until a case receives a trial date.

**B. AMENDMENT OF COMPLAINTS TO SUBSTITUTE PLAINTIFFS**

1. Plaintiffs are hereby granted to leave to amend their complaint to substitute the party plaintiff so long as the necessary documents establishing the newly substituted plaintiff's authority to prosecute the action (as defined by applicable state law) are attached as an exhibit to the amended complaint. No further permission of the Court is required for amendments that comply with these requirements.

2. All changes to the amendments to substitute the parties are reserved until a case receives a trial date.



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THE HONORABLE JOHN C. PORTO

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER LITIGATION

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ATLANTIC COUNTY**

**MASTER DOCKET NO.: ATL-L-2648-15**

**CIVIL ACTION**

**CONSENT ORDER TO AMEND COMPLAINTS TO  
ADD NEW DEFENDANTS PURSUANT TO CMO 19**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, pursuant to CMO 19, that the matters listed in the attached Exhibit "A" are hereby permitted to file an Amended Complaint to add the new Defendants identified in the contemporaneously filed Amended Complaint attached as Exhibit "B." Defendants are not required to file an Answer to any Amended Complaints until an individual case receives a trial date.

**IT IS SO STIPULATED:**

BY: /s/  
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Attorney for Plaintiffs

Date:

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Attorney for Defendants

Date