

Kelly Jones Howell (State Bar ID #030682005)  
Marina Plotkin (State Bar ID # 047582005)  
**HARRIS BEACH PLLC**  
One Gateway Center, Suite 2500  
Newark, New Jersey 07102  
(973) 848-1244  
KHowell@HarrisBeach.com  
MPlotkin@HarrisBeach.com

**FILED**  
NOV 28 2023  
GREGG A. PADOVANO, J.S.C.

*Attorneys for Novartis Pharmaceuticals Corporation*

**IN RE: TASIGNA PRODUCTS  
LIABILITY LITIGATION**

*Applicable to Cases on Attached Schedule A*

**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION, BERGEN COUNTY**

Master Docket No. BER-L-005018-21

Case No. 635

CIVIL ACTION

**[PROPOSED] CASE MANAGEMENT  
ORDER NO. 7**

**THIS MATTER** having been assigned to the Honorable Gregg A. Padovano, pursuant to the Supreme Court's Order designating this matter for Multicounty Litigation ("MCL") status, and the Court having received proposed orders from counsel for the parties, and having conducted a Case Management Conference on September 19, 2023 (via Zoom), and for the reasons set forth on the record and good cause shown,

IT IS on this 28<sup>th</sup> day of November, 2023, **ORDERED:**

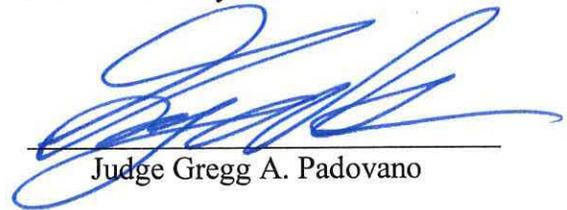
1. All remaining case-specific fact discovery in the ten discovery-pool cases is to be completed 180 days from October 2, 2023.

a. Plaintiffs will produce relevant, non-privileged ESI responsive to NPC's specific requests as agreed by the parties or ordered by the Court by no later than 90 days from October 2, 2023.<sup>1</sup>

<sup>1</sup> The parties agree to revisit the timeline regarding Plaintiffs' social media ESI production in particular cases, as necessary, depending on the timing of resolution of the scope of plaintiffs' social media production.

- b. Defendant will produce relevant, non-privileged sales force ESI responsive to the plaintiffs' specific requests as agreed by the parties by no later than 90 days from October 2, 2023.
2. All case-specific expert discovery will be completed 150 days after the close of fact discovery, according to the following schedule:
- a. Plaintiffs' expert reports will be due 50 days from the close of fact discovery;
  - b. Defendant's expert reports will be due 50 days from the service of plaintiffs' expert reports; and
  - c. Depositions will be completed thereafter prior to the 150-day cutoff.

Dated: 11-28-2023, 2023



Judge Gregg A. Padovano

**Schedule A**  
**MCL Discovery Pool Cases**

<b>Case Name</b>	<b>MCL Number</b>
<i>Darren Chase v. Novartis Pharmaceuticals Corporation</i>	BER-L-004278-21
<i>Stacy Cook v. Novartis Pharmaceuticals Corporation</i>	BER-L-004279-21
<i>John Helmers v. Novartis Pharmaceuticals Corporation</i>	BER-L-001218-22
<i>Kathleen Martin v. Novartis Pharmaceuticals Corporation</i>	BER-L-004515-21
<i>Linda Trudeau v. Novartis Pharmaceuticals Corporation</i>	BER-L-004518-21
<i>Vishnu Chowbay v. Novartis Pharmaceuticals Corporation</i>	BER-L-004315-21
<i>Rebecca Fowler v. Novartis Pharmaceuticals Corporation</i>	BER-L-007441-21
<i>Robert Lambert v. Novartis Pharmaceuticals Corporation</i>	BER-L-004272-21
<i>Tommy Raxter v. Novartis Pharmaceuticals Corporation</i>	BER-L-004317-21