



UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN N-  
NITROSODIMETHYLAMINE (NDMA)  
CONTAMINATION PRODUCTS  
LIABILITY LITIGATION

Civil No. 19-2875 (RBK/JS)

**CASE MANAGEMENT ORDER NO. 10**

The Court having conducted a Case Management Conference on June 26, 2019; and this Order intending to confirm the Court's rulings and to set forth certain other matters; and accordingly,

**IT IS HEREBY ORDERED** this 1<sup>st</sup> day of **July, 2019**, as follows:

1. By **August 15, 2019** plaintiffs shall serve the API Manufacturer and Supplier defendants, and the Finished Product/Dose Manufacturing defendants (hereinafter "defendants"), with formal written document requests. Plaintiffs shall serve each group of defendants with an omnibus document request. Separate document requests may be sent to a defendant as to issues particular to that defendant.

2. By **September 16, 2019**, defendants shall serve plaintiffs with only their objections to the document requests. Each defendant group shall serve plaintiffs with one set of objections to plaintiffs' omnibus document requests. Separate objections may be served as to document requests directed to a particular defendant. The parties are on notice that boilerplate objections

will be overruled and raise Fed.R.Civ.P. 26(g) implications. Younes v. 7-Eleven, Inc., 312 F.R.D. 692, 706-07 (D.N.J. 2015).

3. After the foregoing objections are served, the parties shall meet and confer in person to attempt in good faith to narrow their disputes, and to agree on responsive ESI custodians to be searched and search terms to use.

4. By **September 30, 2019**, the parties shall complete their meet and confer obligations and serve simultaneous letter briefs regarding discovery disputes to be decided. The parties shall address all disputes concerning the ESI to be produced, the custodians to be searched, and search terms to be used. Plaintiffs and each defendant group shall serve a single dispute letter regarding plaintiffs' omnibus document requests. Separate letters may be served for disputes applicable to a particular party. Responses shall be served by **October 18, 2019**.

5. All discovery disputes will be addressed at the in-person conference scheduled on **October 23, 2019 at 10:00 a.m. in Courtroom 3C.**

6. Amongst the issues the Court will address with the parties during the next scheduled conference call with the Court on **July 10, 2019 (4:00 p.m.)** are disputes regarding the Fact Sheets for plaintiffs and defendants and the status of the proposed Form Complaint.

7. Defendants' insurance disclosures are scheduled to be completed by **July 15, 2019**. See June 14, 2019 Order ¶1, Doc. No. 120. Defendants' production of core discovery is scheduled to be completed by **July 19, 2019**. See CMO. No. 7, ¶8, Doc. No. 114. Thereafter, the parties shall meet and confer regarding any alleged deficiencies. By **July 31, 2019**, all disputes shall be raised by plaintiffs in a letter to the Court. By **August 7, 2019**, defendants may respond in a single letter. The phone conference scheduled on August 14, 2019 is changed to an in-person conference to be held in Courtroom 3C on **August 14, 2019 at 2:00 p.m.** All disputes regarding defendants' insurance disclosures and production of core discovery will be addressed at the conference. If no material disputes need to be addressed, the Court will entertain a request to change the in-person conference to a phone conference.

s/ Joel Schneider  
JOEL SCHNEIDER  
United States Magistrate Judge