

NGRV**NICH GOLDENBERG
RASO & VAUGHN**

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to:

**Smalls v. Zhejiang Huahai
Pharmaceutical Co., Ltd. et al.
Case No. 1:20-cv-08199-RMB-SAK**

**Garcia v. Zhejiang Huahai
Pharmaceutical Co., Ltd. et al.
Case No. 1:20-cv-07957-RMB-SAK**

**Suits v. Zhejiang Huahai
Pharmaceutical Co., Ltd et al.
Case No. 1:20-cv-06547-RMB-SAK**

**Lee v. Zhejiang Huahai
Pharmaceutical Co., Ltd. et al.
Case No. 1:20-cv-15324-RMB-SAK**

MDL No. 2875

Honorable Renée Marie Bumb,
Chief Judge

**ORDER
ESTABLISHING CASE
MANAGEMENT
SCHEDULE
FOR WAVE 2
BELLWETHER CASES**

The Parties Having Met and Conferred, to agree upon the case management schedule for the second wave of potential personal injury bellwether plaintiff trials (“Wave 2 BW”) in the following matters:

1. Garcia, Robert – 1:20-cv-07957
2. Lee, Robert – 1:20-cv-15324

3. Smalls, Evon – 1:20-cv-08199

4. Suits, James – 1:20-cv-06547

Having Reviewed the proposed agreed upon schedule,

IT IS ORDERED: the deadlines for the four above matters are:

| Wave 2 BW Trial Event | Wave 2 BW Trial Date |
|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------|
| Deadline to amend Plaintiff Fact Sheet | 3/14/2025 |
| Close of case-specific fact discovery | 5/9/2025 |
| Deadline for Plaintiff to designate experts and serve expert report(s) | 5/16/2025 |
| Deadline for Defendants to designate experts and serve expert report(s) | 6/18/2025 |
| Depositions of experts | 6/18/2025 – 7/21/2025 |
| Close of expert discovery | 7/21/2025 |
| Deadline for parties to exchange deposition designations | 7/31/2025 (Completion of rolling exchange) |
| Deadline to file: (i) Rule 702 motions; and (ii) summary judgment motions | 8/4/2025 |
| Deadline to submit deposition designations, objections, and counter-designations to the Court | 8/29/2025 |
| Deadline to file oppositions to: (i) Rule 702 motions; and (ii) summary judgment motions | 9/4/2025 |
| Deadline to file replies in further support of: (i) Rule 702 motions; and (ii) summary judgment motions | 9/18/2025 |
| Parties to submit (joint or separate if no agreement) position statement(s) to Court on proposed selection of Wave 2 bellwether trial case | 3 business days after the Court's ruling on Rule 702/MSJs |
| Deadline to file motions in limine | 9/24/2025* |
| Deadline to file oppositions to motions in limine | 10/8/2025* |
| Deadline to submit joint final pretrial order | 10/17/2025* |

* Dates to be adjusted pending Court's identification of trial start date

/s/ Thomas I. Vanaskie

Hon. Thomas I. Vanaskie (Ret.)

Special Master