

**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  
AMENDED CASE  
MANAGEMENT  
SCHEDULE  
FOR WAVE 2  
BELLWETHER CASES**

**The Special Master Having Previously Entered the Revised Order  
Establishing Amended Case Management Schedule for Wave 2 Bellwether Cases  
on June 17, 2025 (ECF No. 3089),**

**The Parties Having Met and Conferred**, to agree upon the third amended 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, third amended schedule,

**IT IS ORDERED:** Counsel representing any fact witnesses whose depositions were previously noticed, but which have not been completed, are ordered to promptly provide dates for the depositions of those witnesses to take place before the close of fact discovery on July 11, 2025.

**IT IS ORDERED:** the deadlines for the four above matters previously established in ECF No. 3089 are amended and the deadlines for the four above matters are:

<b>Wave 2 BW Trial Event</b>	<b>Wave 2 BW Trial Date</b>
Close of case-specific fact discovery	7/11/2025
Deadline for Plaintiff to designate experts and serve expert report(s)	8/1/2025
Deadline for Defendants to designate experts and serve expert report(s)	9/16/2025
Depositions of experts	9/16/2025 – 10/21/2025

<b>Wave 2 BW Trial Event</b>	<b>Wave 2 BW Trial Date</b>
Close of expert discovery	10/21/2025
Deadline for parties to exchange deposition designations	11/3/2025 (Completion of rolling exchange)
Deadline to file: (i) Rule 702 motions; and (ii) summary judgment motions	11/10/2025
Deadline to submit deposition designations, objections, and counter-designations to the Court	12/1/2025
Deadline to file oppositions to: (i) Rule 702 motions; and (ii) summary judgment motions	12/12/2025
Deadline to file replies in further support of: (i) Rule 702 motions; and (ii) summary judgment motions	12/26/2025
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	1/16/2026*
Deadline to file oppositions to motions in limine	2/13/2026*
Deadline to submit joint final pretrial order	2/17/2026*

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

/s/ Thomas I. Vanaskie  
Hon. Thomas I. Vanaskie (Ret.)  
Special Master