FILED

JUN 14 2016

BRIAN R. MARTINOTTI, J.S.C.

SHANEKA L. SHANNON f/n/a SHANEKA WHYLES,	**SUPERIOR COURT OF NEW JERSEY LAW DIVISION: BERGEN COUNTY**
Plaintiff,	**DOCKET NO. BER-L-10942-10**
v.	
BAYER CORP., ET AL.,	**IN RE YAZ®, YASMIN®, OCELLA® LITIGATION, CASE NO. 287**
Defendants.	**CIVIL ACTION**
	ORDER SETTING DISCOVERY SCHEDULE

THIS MATTER, having been assigned to the Honorable Brian R. Martinotti, J.S.C. pursuant to the Supreme Court's Order of February 9, 2010 ordering centralized case management of the New Jersey state court actions arising out of the use of the oral contraceptives Yaz®, Yasmin® and Ocella®, and the parties hereby requesting that the Court enter the following discovery schedule;

And for good cause shown, the following Order is hereby entered:

IT IS SO ORDERED on this 14 day of June, 2016,

1. The stay imposed by Paragraph I.1 of CMO 52 is hereby lifted in this matter.

2. If not already provided under CMOs No. 51 or No. 52, plaintiff will serve updated authorizations and an updated and current Plaintiff Fact Sheet compliant with CMO No. 7 no later than 14 days after the date of this Order.

3. If not already provided under CMO No. 52, defendants will serve an updated and current Defendant Fact Sheet compliant with CMO No. 8 no later than 30 days after service of an updated Plaintiff Fact Sheet. Defendants' obligations with respect to a Defendant Fact Sheet and

document production under CMO No. 8 shall be limited to the healthcare providers identified in the most current Plaintiff Fact Sheet as of 14 days after the date of this Order.

4. Case-specific fact discovery may commence immediately and shall conclude 150 days after the date of this Order. Parties must identify any witness they intend to depose no later than 30 days before the conclusion of case-specific fact discovery.

5. Plaintiff's additional case-specific expert reports under R. 4:10-2(d) and R. 4:17-4(e), if any, shall be served no later than 30 days after the conclusion of case-specific fact discovery.

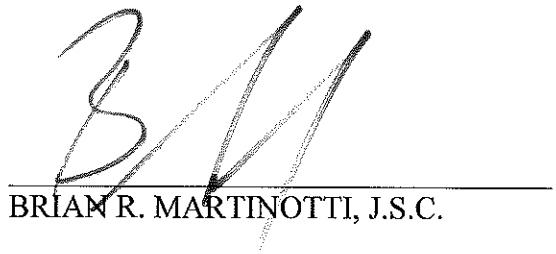
6. Defendants' additional case-specific expert reports under R. 4:10-2(d) and R. 4:17-4(e), if any, shall be served no later than 30 days after the deadline for plaintiffs' case-specific expert reports.

7. Expert depositions, to the extent either party seeks this discovery, shall be taken following receipt of all expert reports and shall conclude 30 days after the deadline for defendants' expert reports.

8. *Kemp* motions and dispositive motions, if any, shall be filed no later than 14 days after the conclusion of expert discovery, with response briefs due 30 days later.

9. Any party may ask the Court to modify any of the above deadlines, either to extend or shorten them, following a meet and confer with the other party.

10. No discovery shall be permitted except as specifically contemplated in the above schedule without prior leave of the Court.



BRIAN R. MARTINOTTI, J.S.C.