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FILED

OCT 08 2024

GREGG A. PADOVANO, J.S.C.

MARGARET DALY,

Plaintiff,

vs.

ETHICON, INC., ETHICON WOMEN'S
HEALTH AND UROLOGY, a Division of
ETHICON, INC., GYNECARE, JOHNSON &
JOHNSON, and JOHN DOES 1-20,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – BERGEN COUNTY
DOCKET NO. BER-L-14421-14

MASTER DOCKET NO. BER-L-11575-14

CIVIL ACTION

In Re Pelvic Mesh/Gynecare Litigation
Case No. 291

**CASE MANAGEMENT ORDER TO EXTEND
CURRENT DEADLINES**

THIS MATTER, having been opened to the Court by Plaintiffs, through their Counsel NSPR Law Services, LLC & Napoli Shkolnik, PLLC, and Defendants, through their counsel Riker Danzig LLP, seeking an Order extending current discovery deadlines, by consent of all parties, and for good cause shown;

IT IS ON THIS 8TH day of ~~September~~ October, 2024;

ORDERED that the deadlines in this matter shall be extended as follows:

A. Expert Discovery

- (i) Except as set out below, the deadlines set out in CMO 109 govern this case.

- (ii) The parties shall make best efforts to complete all necessary plaintiff expert depositions by **October 31, 2024**, and all necessary defense expert depositions by **December 6, 2024**. Defense expert depositions will not be conducted until after completion of plaintiff expert depositions.

- (iii) Expert discovery shall be completed by **December 6, 2024**.

B. Pre-Trial Motions

- (i) Pretrial motions other than *in limine* (dispositive, Kemp/ Accutane) shall be served **by January 24, 2025**. Consistent with the practice in this MCL, the original motion papers shall be submitted directly to the trial judge's chambers. Only Notices of Motion and Forms of Order shall be submitted for filing with the Clerk's office (either via JEDS or in hard copy).

- (ii) Oppositions to pre-trial motions shall be filed and served by **February 14, 2025**.

- (iii) Only when necessary, on leave of Court, limited replies shall be filed and served by **February 28, 2025**.

- (iv) Oral argument on pre-trial motions and any remaining outstanding disputed deposition designations shall commence on **[To be determined by later order of the Court]**, continuing day to day as necessary.

- (v) The court shall issue rulings on pretrial motions and any outstanding deposition designation disputes that impact opening statements, or other such issues that must be resolved prior to opening statements by no later than **[To be determined by later order of the Court]**.



Hon. Gregg A. Padovano, J.S.C.

CONSENTED TO AS TO FORM AND ENTRY:

Chris LoPalo
NSPR Law Services, LLC
1302 Avenida Ponce de Leon
Santurce, PR 00907

Kelly S. Crawford, Esq.
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and

Shayna E. Sacks
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360 Lexington Ave., 11th Floor
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*Attorney for Defendants, Ethicon, Inc. and
Johnson & Johnson*

By: /s/ Kelly S. Crawford¹
Kelly S. Crawford

*Attorneys for Plaintiff,
Margaret Daly*

Dated: September 11, 2024

By: /s/Shayna E. Sacks¹

Dated: September 11, 2024

4876-8975-7154, v. 1

¹ Pursuant to the New Jersey Supreme Court Omnibus Order on Covid-19 issues entered on March 27, 2020, “ The provisions of Rule 1:32-2A(c) and all other Court Rules requiring original signatures on filings are relaxed and supplemented so as to permit electronic signatures to be used in all filing processes temporarily authorized to be used during the COVID-19 crisis, including, but not limited to emergent applications submitted by email and hardcopy submissions in dockets without an approved electronic filing system... .”