Kelly S. Crawford - NJ Attorney ID #029141993 FILED **RIKER DANZIG LLP** Headquarters Plaza OCT 08 2024 GREGGA. PADOVANO, J.S.C. One Speedwell Avenue Morristown, NJ 07962-1981 (973) 538-0800 Attorneys for Defendants MARGARET DALY, SUPERIOR COURT OF NEW JERSEY LAW DIVISION - BERGEN COUNTY DOCKET NO. BER-L-14421-14 MASTER DOCKET NO. BER-L-11575-14 Plaintiff, CIVIL ACTION VS. In Re Pelvic Mesh/Gynecare Litigation Case No. 291 ETHICON, INC., ETHICON WOMEN'S CASE MANAGEMENT ORDER TO EXTEND HEALTH AND UROLOGY, a Division of **CURRENT DEADLINES** ETHICON, INC., GYNECARE, JOHNSON & JOHNSON, and JOHN DOES 1-20,

Defendants.

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 8 day of September, 2024;

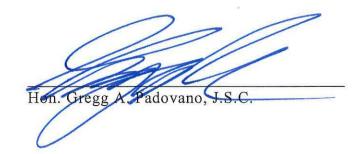
**ORDERED** that the deadlines in this matter shall be extended as follows:

- 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].



## CONSENTED TO AS TO FORM AND ENTRY:

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

and

Shayna E. Sacks Napoli Shkolnik PLLC 360 Lexington Ave., 11<sup>th</sup> Floor New York, NY 100117

Attorneys for Plaintiff, Margaret Daly Kelly S. Crawford, Esq. Riker Danzig LLP Headquarters Plaza One Speedwell Avenue Morristown, NJ 07962

Attorney for Defendants, Ethicon, Inc. and Johnson & Johnson

By: <u>/s/ Kelly S. Crawford<sup>1</sup></u> Kelly S. Crawford

Dated: September 11, 2024

By: /s/Shayna E. Sacks<sup>1</sup>

Dated: September 11, 2024

4876-8975-7154, v. 1

<sup>&</sup>lt;sup>1</sup> 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....."