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FILED

JUL 08 2024

GREGG A. PADOVANO, J.S.C.

Attorneys for Defendants

**IN RE: PELVIC MESH/GYNECARE
LITIGATION**

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – BERGIN COUNTY**

CASE NO. 291

**MASTER DOCKET NO. BER-L-11575-14
MCL**

This Document Relates to:

Lee Davis Boggs v. Ethicon, Inc. et al. – BER-L-
007077-21

Darla Brown v. Ethicon, Inc. et al. – BER-L-
007764-21

Jennifer Gurr v. Ethicon, Inc. et al. – BER-L-
007765-21

Erika Watson v. Ethicon, Inc. et al. – BER-L-
008453-21

**CASE MANAGEMENT ORDER TO
EXTEND CURRENT DEADLINES**

THIS MATTER, having been opened to the Court by Plaintiffs, through their Counsel Motley Rice, 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 July, 2024;

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

A. Expert Discovery

- (i) Plaintiff expert report(s) shall be served by **July 19, 2024**. If Plaintiff fails to serve all expert

reports by the deadline without having obtained prior leave of the Court, the case may be dismissed with prejudice.

- (ii) Defense expert reports shall be served by **September 19, 2024**.
- (iii) The parties shall make best efforts to complete all necessary plaintiff expert depositions by **October 18, 2024**, and all necessary defense expert depositions by **November 18, 2024**. Defense expert depositions will not be conducted until after completion of plaintiff expert depositions.
- (iv) Expert discovery shall be completed by **November 18, 2024**.

B. Pre-Trial Motions

- (i) Pre-trial motions other than *in limine* (dispositive, *Kemp/ Accutane*) shall be served by **December 20, 2024**. 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) Opposition to pre-trial motions shall be filed and served by **January 17, 2024**.
- (iii) Only when necessary, on leave of Court, limited replies shall be filed and served by **January 28, 2024**.
- (iv) Oral argument on pre-trial motions shall commence on a date to be determined by the Court.



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

CONSENTED TO AS TO FORM AND ENTRY:

Sarah T. Hansel, Esq.
Motley Rice
Woodland Falls Corporate Park
210 Lake Drive East, Suite 101
Cherry Hill, NJ 08002

*Attorney for Plaintiff,
Darla Brown*

By: /s/ Sarah T. Hansel¹
Sarah T. Hansel

Dated: June 26, , 2024

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*Attorneys for Defendants, Ethicon, Inc.
and Johnson & Johnson*

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

Dated: June 26, 2024

4885-2821-4733, 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... ."