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IN RE TALC BASED POWDER PRODUCT  
LITIGATION

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: ATLANTIC COUNTY

CASE NO.: 300

MASTER DOCKET: ATL-L-2648-15

CIVIL ACTION

**CASE MANAGEMENT ORDER 20  
EXPERT DEPOSITION  
COORDINATION IN *CARL* AND  
*BALDERRAMA* WITH THE MDL**

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**THIS MATTER** having come before the Court upon the joint application of the Parties to address efficiencies in connection with the depositions of the experts of both sides in the *Carl*, *Balderrama*, and MDL bellwether cases, and the parties having consented to same and for good cause shown,

IT IS ON THIS 2nd day of April, 2024,

**ORDERED THAT:**

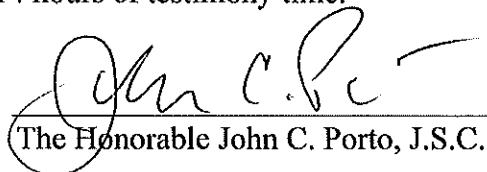
1. All general expert depositions will be taken one time and can be used in either the MDL or MCL. This includes depositions already taken and those to be taken in the future. The exception is in the event there are differences in the MDL vs. MCL report. To the extent there are differences, an additional deposition can be taken in the MCL to explore the limited differences. With respect to case specific experts, an additional deposition may be taken to question on case specific issues to the extent they have not already been questioned.

2. Depositions of general causation experts who offer supplements to their original MDL reports on general causation will be limited to four hours of testimony.

3. Depositions of experts who in addition to general opinions offer case-specific

opinions for up to two individual Plaintiffs shall be limited to a total of one day/seven hours of testimony.

4. If an expert offers general opinions and case-specific opinions as to three of more plaintiffs, the deposition is limited to two days/14 hours of testimony time.



The Honorable John C. Porto, J.S.C.