

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**MDL No. 2875**

**Honorable Renée Marie Bumb,  
Chief Judge**

**SPECIAL MASTER ORDER**

**NOW, this 3rd Day of February, 2025, IT IS HEREBY ORDERED  
THAT:**

1. No later than February 11, 2025, counsel for Plaintiffs shall submit a letter report on the status of discussions with ZHP counsel concerning material safety data sheets and ZHP certificates of analyses, proposing a briefing schedule on those matters if the parties are unable to reach agreement on a stipulated order.
2. ZHP shall make its designations of testimony from the deposition of Min Li no later than February 28, 2025. Thereafter, ZHP shall respond to Plaintiffs' revised deposition designations within ten (10) days of service of Plaintiffs' revised deposition designation.

3. The show cause process for challenges to Plaintiff Fact Sheets (“PFS”) established by Case Management Order No. 16 (ECF No. 249) is reinstated. Defendants shall submit to Plaintiffs’ Leadership Counsel a list of at-issue PFS no later than February 14, 2025, and the parties shall be prepared to address allegedly deficient PFS at the next Case Management Conference. Questions concerning the status of orders with respect to challenged PFS shall be directed to Chief Judge Bumb’s career law clerk, Clarissa Lintner.
4. No later than March 3, 2023, the parties shall submit a proposed process for addressing dismissal of individual cases for lack of product identification information.
5. No later than February 10, 2025, the parties shall submit a stipulated order resolving Plaintiffs’ “common benefit” motion (ECF No. 2960). If the parties are unable to agree to a stipulated ECF No. 2960, they shall propose a briefing schedule to resolve the motion.
6. No later than February 3, 2025, Plaintiffs shall advise the Court on the inclusion of the Yolanda Bonmon (No. 1:20-cv-09207) and Robert Lee (No. 1:20-19843) cases in the Wave 2 bellwether trials.
7. No later than February 14, 2025, the parties shall propose a schedule for bringing to trial the Wave 2 bellwether cases, identifying by case name,

the sequence in which the parties propose that the Wave 2 bellwether cases  
by tried.

8. The next Case Management Conference will be held via Teams on March  
3, 2025, commencing at 10:00 a.m., Eastern Time.

Dated: February 3, 2025

s/ Thomas I. Vanaskie  
Hon. Thomas I. Vanaskie (Ret.)  
Special Master