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April 14, 2025

Via ECF

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, No. 1:19-md-02875 (D.N.J.)

Dear Judge Vanaskie:

Please accept this letter on behalf of the Plaintiffs, providing an update on ZHP's production of its certificates of analysis, material safety data sheets, document retention policies, and related documents.

On April 4, 2025, ZHP requested a seven-day extension (from April 8 to April 15) to produce the internal documents processing its supplier's certificates of analysis (COAs) and material safety data sheets (MSDSs). (Ex. 1 hereto). Plaintiffs are still awaiting that production.

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In the same email, ZHP also identified two retention policies allegedly permitting it to destroy its supplier's COAs and MSDSs. It provided a certified translation of one of the policies and committed to providing the Court with a certified translation of the other. Plaintiffs have not received a copy of this second certified translation.

ZHP also confirmed that (1) there is no Chinese standard for TEA HCL; (2) the Chinese standards it produced earlier were in effect for the entire relevant time period; and (3) it did not maintain copies of the Chinese standards for DMF and TEA.

Lastly, the Parties are continuing to meet and confer on a stipulation establishing ZHP did not have a retention policy providing for the destruction of Jinsheng Lin's custodial file before December 2017.

Once ZHP has produced the above-referenced documents, Plaintiffs will promptly complete their review and update the Court on how they wish to proceed.

Thank you for your courtesies and consideration.

Respectfully,



Adam M. Slater
Plaintiffs' Liaison Counsel

Cc: Counsel of record (via ECF)