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IN RE: PELVIC

MESH/GYNECARE LITIGATION

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**FILED**  
APR 22 2025  
GREGG A. PADOVANO, J.S.C.

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION: BERGEN COUNTY

CASE NO. 291

MASTER DOCKET NO.: BER-L-11575-14

CIVIL ACTION

CASE MANAGEMENT ORDER #119 -  
UPDATED DISCOVERY COMPLETION  
ORDER REGARDING CERTAIN CMO 105  
ACTIVATED CASES.

All prior orders remain in full force and  
effect except as modified by this Order.

IT IS on this 22<sup>ND</sup> day of April 2025, **ORDERED** as follows:

- I. **DISCOVERY DEADLINES FOR CMO 105 CASES LISTED ON THE ATTACHED EXHIBIT A.**
  - A. Except as otherwise governed by CMOs 95 (regarding friends/family) and 97 (regarding sales reps), any outstanding fact discovery will be completed by August 15, 2025.

**B. Expert Discovery**

- (i) Plaintiffs are to advise Defendants if the plaintiff has or intends to submit to an IME by plaintiffs' case specific expert by *August 11, 2025*, which expert will be conducting the exam, and whether a pelvic exam will be performed.
- (ii) Plaintiffs are to provide Defendants with possible dates between *September 19, 2025* and *October 8, 2025* when the plaintiff can travel for a DME to be conducted by Defendants' experts by *October 8, 2025*. Defendants will then send plaintiffs' counsel an email confirming the name of the defense expert, his or her qualifications, the location, date and time of the DME. This information will then be formalized in a Notice for DME that complies with the New Jersey Court Rules. If Plaintiff objects to any aspect of the proposed DME, those objections can be raised with the Court by letter if there is no resolution after meeting and conferring with Defendants.
- (iii) Plaintiff expert report(s) shall be served by *September 19, 2025*. If Plaintiffs fail to serve all expert reports by the deadline without having obtained prior leave of the Court, the case may be dismissed with prejudice.
- (iv) Defense expert reports shall be served by *October 17, 2025*.
- (v) Parties shall make best efforts to complete all necessary plaintiff expert depositions by *November 14, 2025* and all necessary defense expert depositions by *December 12, 2025*. Plaintiff's experts will not be deposed until after receipt of the defense expert reports and the notes of all DME's. Defense expert depositions will not be conducted until after completion of plaintiff expert depositions.
- (vi) Expert discovery shall be completed by *December 12, 2025*.

**C. Pre-Trial Motions**

- (i) Pretrial motions other than *in limine* (dispositive, Kemp/ Accutane) shall be served by *January 9, 2026*. 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 6, 2026*.
- (iii) Replies shall be filed and served by *February 27, 2026*.
- (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]**.

Any case that fails to meet any of the deadlines for discovery in this order without good cause or consent of the opposing party shall not be considered a candidate for the next trial setting.

## II. CMO 105 CASES NOT LISTED ON EXHIBIT A.

Plaintiffs' counsel for any CMO 105-activated case that is not listed on Exhibit A may contact defense liaison counsel ([Kcrawford@riker.com](mailto:Kcrawford@riker.com)) to meet and confer regarding case work up and scheduling issues.



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HON. GREGG A. PADOVANO, J.S.C.

## CMO 119 Exhibit A

	Plaintiff/Case Name	Docket #	PL Firm(s)
1	Bakaj, Deborah	BER-L-002735-23	Anapol Weiss
2	Bible, Violetta	BER-L-006845-22	Bailey & Glasser, LLP; Cohen Placitella & Roth, PC
3	Biller, Lisa	BER-L-000950-24	Schroeder Law Office, PLLC/Bossier & Associates
4	Bunn, Jodi	BER-L-1202-24	Anapol Weiss
5	Cardenas, Connie	BER-L-005204-22	Motley Rice New Jersey, LLC; Wagstaff Law Firm (Amy Wagstaff)
6	Chiofalo, Gail	BER-L-005652-23	Schroeder Law Office, PLLC/Bossier & Associates
7	Doyle, Dianna	BER-L-005205-22	Motley Rice New Jersey, LLC; Wagstaff Law Firm (Amy Wagstaff)
8	Godsey, Vicki Sue	BER-L-004309-23	Bailey & Glasser, LLP; Cohen Placitella & Roth, PC
9	Gore, Marion and Raymond	BER-L-011110-14	Cohen Placitella; Roth, P.C./ Motley Rice
10	Harrill, Barbara and James	BER-L-006460-23	Anapol Weiss
11	Holler, Barbera	BER-L-005539-23	Anapol Weiss
12	Huxtable, Gena and Richard	BER-L-006705-22	Motley Rice New Jersey, LLC
13	Johnson, Tori	BER-L-3236-24	Anapol Weiss
14	Laneve, Janet	BER-L-003537-23	Schroeder Law Office, PLLC/Bossier & Associates
15	McCabe, Kathy Lynn and Ronald	BER-L-000080-23	Bailey & Glasser, LLP; Cohen Placitella & Roth, PC
16	McDaniel, Christy	BER-L-005653-23	Javerbaum Wurgalt Hicks Kahn Wikstrom & Sinins, PC/ Flint Cooper
17	Mosley, Gwendolyn (KY)	BER-L-000739-23	Schroeder Law Office, PLLC/Bossier & Associates
18	Nicholes, Susan	BER-L-000572-24	Schroeder Law Office, PLLC/Bossier & Associates
19	Pons, Elizabeth	BER-L-000467-23	Bailey & Glasser, LLP; Cohen Placitella & Roth, PC
20	Prudente, Jennifer and Michael	BER-L-014083-14	Messa & Associates
21	Quinn, Erin	BER-L-001303-24	Anapol Weiss
22	Richmond, Summer and Valladares, Melvin	BER-L-3274-24	Anapols Weiss
23	Rudo, Melissa	BER-L-002475-24	Schroeder Law Office, PLLC/Bossier & Associates
24	Segura, Roselyn (aka Garcia, Roselyn)	BER-L-003538-23	Schroeder Law Office, PLLC/Bossier & Associates

25	Sands, Clara	BER-L-1448-24	Anapols Weiss
26	Shoop, Kimberly and Brian	BER-L-3377-24	Anapol Weiss
27	Sotomayor, Mary Ann and Alex	BER-L-005107-23	Motley Rice New Jersey, LLC Wagstaff Law Firm. (Amy Wagstaff)
28	Spliedt, Corinne	BER-L-000741-23	Schroeder Law Office, PLLC/Bossier & Associates
29	Stiers, Ralinda	BER-L-015352-14	Bernstein Liebhard LLP; Law Offices of Jan Meyer & Associates, PC; Kirkendall Dwyer
30	Stone, Lisa	BER-L-005764-23	Cohen Placitella & Roth, PC/Bailey & Glasser
31	Trainer, Linda and Mark	BER-L-014104-14	Cohen Placitella; Roth, PC; Motley Rice, LLC
32	Tucker, Evelyn	BER-L-002234-23	Bossier & Associates; Schroeder Law Office, PLLC
33	Yoder, Tracy and Allan (CMO 106)	BER-L-002163-23	Anapol Weiss