UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

IN RE: COVIDIEN HERNIA MESH PRODUCTS LIABILITY LITIGATION NO. II,

This Document Relates To:

All Cases

MDL No. 1:22-md-03029-PBS

JOINT MOTION FOR EXTENSION OF MEDIATION COMPLETION DEADLINE

COME NOW the Parties to jointly request an extension of the mediation completion deadline set forth in Case Management Order No. 15 (ECF No. 487). The current deadline is September 22, 2025. The Parties believe good cause exists for an extension of the existing deadline to January 14, 2026, to allow sufficient time for the Parties to complete mediation. No prejudice will result from this extension because the Parties are not proposing to change the February 2026 trial date, or any trial-related dates.

WHEREFORE, the Parties respectfully request the Court enter the accompanying Proposed Order extending the deadline to complete mediation to January 14, 2026.

Dated: August 6, 2025

/s/ Kelsey L. Stokes

Kelsey L. Stokes

Plaintiffs' Interim Co-Lead Counsel

Texas Bar No. 24083912

FLEMING, NOLEN & JEZ, L.L.P.

2800 Post Oak Blvd., Suite 4000

Houston, TX 77056-6109

Tel: (713) 621-7944

Fax: (713) 621-9638

kelsey stokes@fleming-law.com

Attorney for Defendants

Timothy M. O'Brien *Plaintiffs' Interim Co-Lead Counsel*

Florida Bar No. 055565

Respectfully submitted,

/s/ Jessica C. Wilson

Jessica C. Wilson (BBO No. 692674)

DLA Piper LLP (US)

33 Arch Street, 26th Floor

Boston, MA 02110-1447

Tel: (617) 406-6000

Fax: (617) 406-6100

jessica.wilson@us.dlapiper.com

LEVIN, PAPANTONIO, RAFFERTY, PROCTOR, BUCHANAN, O'BRIEN, BARR & MOUGEY, P.A. 316 South Baylen St., Ste. 600 Pensacola, FL 32502 Tel: (850) 435-7084 Fax: (850) 436-6084

Walter Kelley, Esq. *Plaintiffs' Liaison Counsel* BBO# 670525 4 Court Street Plymouth, MA 02360 Tel: (617) 420-1111 Fax: (617) 830-0712 wkelley@realjustice.com

tobrien@levinlaw.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I, Jessica C. Wilson, certify that on August 6, 2025 a true and correct copy of the foregoing document was served on all counsel of record by filing it with the Court's NextGen CM/ECF system.

/s/ Jessica C. Wilson
Jessica C. Wilson