

**FILED**

**MAY -2 2022**

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J.S.C.**

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IN RE HEALTHPLUS SURGERY CENTER  
LITIGATION

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY  
CASE NO.: 632  
MASTER DOCKET NO.: BER-L-7092-20

Civil Action

**SCHEDULING ORDER**

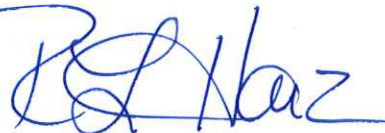
**THIS MATTER** having come before the Court at 1:00 p.m. on May 2, 2022, by way of a joint video status conference with counsel to all parties named in the above-referenced Multicounty Litigation and the Honorable James B. Clark, III, U.S.M.J., who is case managing three consolidated putative class action lawsuits filed against HealthPlus Surgery Center, LLC, and other named Defendants in the United States District Court for the District of New Jersey (Civil Action Nos. 2:19-cv-964, 2:19-cv-965, 2:19-cv-5906 (WJM)) (the "Federal Actions"), and in the interest of continuing combined coordination of all discovery in the Federal Actions and the above-captioned Multicounty Litigation, and for good cause having been shown;

**IT IS HEREBY ORDERED** that discovery in the Federal Actions and the Multicounty Litigation shall be completed in accordance with the following schedule:

1. May 31, 2022:
  - a. All parties must serve responses to any and all discovery deficiency letters received from any other party;
  - b. All parties must serve initial responses to any additional interrogatories and/or requests for production of documents received from any other party (subject to supplemental productions);
2. June 10, 2022: Any motion to add new parties, whether by amended or third-party complaint, and any motion to amend the pleadings, must be filed not later than June 10, 2022 and shall be made returnable on July 5, 2022.
3. September 15, 2022: Deadline to complete all fact discovery, party depositions, and fact-witness depositions;
4. October 31, 2022: Plaintiffs' expert reports due;
5. December 15, 2022: Defendants' expert reports due;
6. January 30, 2023: Expert depositions must be complete;
7. To be determined:
  - a. Deadline to file dispositive motions;
  - b. Deadline to file class certification motions.

**IT IS HEREBY FURTHER ORDERED** that a Zoom conference shall be conducted on September 12, 2022 at 1:00pm; and

**IT IS FURTHER ORDERED** that all parties involved in the MCL Litigation will advise Judge Harz by joint letter on or about July 29, 2022 regarding the status of the MCL cases.



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Hon. Rachelle L. Harz, J.S.C.