

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: BERGEN COUNTY

**FILED**

CASE NO. 624  
MASTER DOCKET  
NO.: BER-L-\_\_\_\_ - \_\_\_\_

AUG 01 2017

RACHELLE L. HARZ  
J.S.C.

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IN RE STRYKER LFIT CoCr V40  
FEMORAL HEADS HIP IMPLANT  
LITIGATION

CIVIL ACTION  
CASE MANAGEMENT ORDER #2

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

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**This Matter** having been assigned to the Honorable Rachelle L. Harz, J.S.C., pursuant to the Supreme Court's Order of May 16, 2017, and this court having conducted a Case Management Conference on July 31, 2017; and counsel appearing, and for good cause shown and for the reasons set forth on the record;

**IT IS** on this 1<sup>st</sup> day of August 2017,

**ORDERED,**

**I. MDL COORDINATION**

1. Judge Harz has been and will continue to be in contact with Judge Talwani in connection with the ongoing MDL litigation. This court is aware that there is overlap in the executive committees of both litigations, which will assist in litigation going forward.

**II. FACT SHEETS AND PLEADINGS**

1. Pleadings. Parties shall meet and confer regarding long and short form pleadings. Parties shall come to an agreement by August 11, 2017. If no agreement is reached by said date, parties shall brief any remaining issues by August 25, 2017, with argument to be heard at the next Case Management Conference.

2. Fact Sheets. Parties shall meet and confer regarding the implementation of fact sheets. Parties shall come to an agreement by September 15, 2017.

### **III. WRITTEN DISCOVERY DRAFTS**

1. Parties shall meet and confer regarding plaintiffs' First Request for the Production of Documents and Tangible Things, deemed served, by August 21, 2017. The parties shall confer regarding timing of objections. This court will discuss at the next Case Management Conference the dates upon which defendant shall submit objections and/or produce documents.


### **IV. PROTECTIVE ORDER**

1. Counsel shall meet and confer and submit a proposed protective order to this court by August 11, 2017. Any remaining issues regarding the protective order shall be briefed by August 25, 2017 with argument to be heard at the next Case Management Conference.

### **V. CASE MANAGEMENT CONFERENCE 3**

1. The next Case Management Conference is scheduled for September 20, 2017 at 10:00 a.m. Liaison counsel shall report at 9:00 a.m. Counsel shall submit a proposed agenda seven (7) days prior to this Case Management Conference.
2. A copy of this order will be posted on the Judiciary Website.

Dated: August 1, 2017

  
Rachelle L. Harz, J.S.C.