

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: TEPEZZA MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

This Document Relates to All Cases

No. 1:23-cv-03568
MDL No. 3079

Judge Thomas M. Durkin

Magistrate Judge M. David Weisman

[JOINT PROPOSED] CASE MANAGEMENT ORDER NO. 4
**(Deadlines Related to Corporate Discovery, Core and Supplemental Bellwether Case Fact
Discovery, Experts, Briefing and Bellwether Trials)**

The Plaintiffs’ Leadership Committee (PLC) on behalf of all plaintiffs in MDL No. 3079 and Horizon Therapeutics USA, Inc. (Horizon) (collectively, the “Parties”) submit this Joint Proposed Schedule pursuant to the Court’s May 1, 2024 Minute Entry (ECF No. 143) (J. Durkin) and adopted by the Court’s May 9, 2024 Minute Entry (ECF No. 144) (J. Weisman) ordering the Parties to “submit an agreed proposed schedule or, if they cannot reach agreement, a comparison of their proposed schedules in the same format as R. 139-2,” setting the trial of the first Bellwether Trial Plaintiff on March 9, 2026. The Parties met and conferred regarding a proposed schedule and were able to reach agreement regarding most dates. The Parties present their positions regarding the remaining disputes, notated as “disputed” in the proposed schedule below.

Deadline	PLC’s Proposed Date	Horizon’s Proposed Date
Horizon to select four Initial Bellwether Discovery Cases (CMO No. 3 § III(B))	May 30, 2024	May 30, 2024
The Parties to generate four random selections for Initial	June 6, 2024	June 6, 2024

Deadline	PLC's Proposed Date	Horizon's Proposed Date
Bellwether Discovery Cases (CMO No. 3 § III(C))		
The Parties' Submission of a Joint Proposed Order Identifying the 12 Initial Bellwether Discovery Cases (Joint Stipulation to Modify Deadlines in CMO No. 3 § A)	June 6, 2024	June 6, 2024
<p>Horizon's due date to file Rule 12(b)(6) motions on Initial Bellwether Discovery Cases (Joint Stipulation to Modify Deadlines in CMO No. 3 § C)</p> <p>[Disputed as to proposed page limitations and font]</p>	<p>July 19, 2024</p> <p><u>PLC's Position:</u></p> <p>To the extent the Defendant intends to file an Omnibus Motion that generally affects more than one plaintiff in this MDL, the brief shall be limited to 20 pages in Century Schoolbook Font.</p> <p>To the extent the Defendant intends to file a brief related to alleged pleading defects related to any individual state court claim the brief shall be limited to a total of 30 pages for all Plaintiffs in Century Schoolbook Font.</p> <p>The PLC notes the Court ordered the parties to negotiate page limits regarding Rule 12 motion practice. Despite that, and as Horizon notes, it refused to engage in any form of negotiation over reasonable page limitations. The PLC's approach is reasonable given every state in the Union recognizes some form of action for negligence and the allegations related to fraud</p>	<p>July 19, 2024</p> <p><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p>Horizon proposes the parties meet and confer regarding page limits following identification of all 12 bellwether trial cases so Horizon can evaluate any grounds to dismiss each of the 12 bellwether cases. Horizon does not seek an exception to the Court's Case Procedures at this time. It is premature to discuss page limits until all 12 bellwether cases are selected and Horizon has had an opportunity to evaluate the grounds for motions to dismiss in each matter and confer with plaintiffs.</p> <p>Horizon further objects that the PLC proposes that Horizon's case-specific motions to dismiss be confined to an omnibus motion limited to 2.5 pages per case.</p>

Deadline	PLC's Proposed Date	Horizon's Proposed Date
	are largely uniform within the various filed Complaints.	<p>Horizon further objects that the PLC inequitably proposes that Horizon's omnibus motion be limited to 20 pages but proposes the PLC's opposition be 25 pages.</p> <p>Horizon objects to the PLC's proposal that the PLC dictate use of a specific font, not required by L.R. 5.2 (Electronic and Paper Documents Filed).</p>
Court-Ordered Quarterly Mediation, to Commence:	On or about August 1, 2024. Subsequent meetings to be held every 90 days thereafter.	On or about August 1, 2024. Subsequent meetings to be held every 90 days thereafter.
<p>PLC's due date for Oppositions to any Rule 12 motions (CMO No. 3 § V)</p> <p>[Disputed as to proposed page limitations and font]</p>	<p>August 30, 2024</p> <p><u>PLC's Position:</u></p> <p>The PLC's due date for its opposition to any Omnibus Brief filed by Defendant. The brief shall be limited to 25 pages. The PLC's brief(s) related to individual state court cause of actions shall be limited to a total of 30 pages for all Plaintiffs in Century Schoolbook Font. See above.</p>	<p>August 30, 2024</p> <p><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p>See Horizon's position above.</p>
<p>Due date for Horizon's Rule 12 Replies (CMO No. 3 § V)</p> <p>[Disputed as to proposed page limitations, font, and reply limitations]</p>	<p>September 27, 2024</p> <p><u>PLC's Position:</u></p> <p>The Defendant shall be entitled to a 10-page reply to the PLC's Opposition on its Omnibus Motion to Dismiss in Century Schoolbook Font.</p>	<p>September 27, 2024</p> <p><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p>See Horizon's position above regarding page limits and font.</p>

Deadline	PLC's Proposed Date	Horizon's Proposed Date
	The Court will not entertain Reply briefs on any motion related to a state court claim affecting an individual plaintiff. See above.	Horizon further objects that the PLC proposes to limit Horizon's ability to reply in support of its motions.
The issues set forth in Defendant's Motions to Dismiss will be ripe for oral argument, at the Court's discretion, by:	The PLC, at the Court's discretion, proposes the Court set a hearing between October 8 – 11.	At the Court's discretion.
Close of Core Fact Discovery	December 20, 2024	December 20, 2024
Simultaneous Submission of Memorandum to Court Regarding the Parties' Recommendations for the 4 Initial Bellwether Trial Cases (CMO No. 3 § V)	January 17, 2025	January 17, 2025
Hearing to Select Four Initial Bellwether Trial Cases, ripe for argument:	At the Court's discretion, on or about January 31, 2025	At the Court's discretion, on or about January 31, 2025
<p data-bbox="203 1163 513 1232">Close of Corporate Fact Discovery</p> <p data-bbox="203 1335 475 1367">[Disputed Deadline]</p>	<p data-bbox="613 1163 805 1194">April 10, 2025</p> <p data-bbox="613 1230 824 1262"><u>PLC's Position:</u></p> <p data-bbox="613 1297 1003 1877">Generally, the PLC objects given MDL Courts in NDIL do not bifurcate general and case-specific discovery, a position the Court endorsed at the last status. The PLC has consistently maintained corporate discovery should align with the close of case-specific discovery and last 12 months—the current offer contemplates an 11.5-month period. Beyond that, corporate discovery did not open on October 23, 2023. On October 23, 2023,</p>	<p data-bbox="1024 1163 1265 1194">February 14, 2025</p> <p data-bbox="1024 1230 1292 1262"><u>Horizon's Position:</u></p> <p data-bbox="1024 1297 1409 1587">Corporate fact discovery is core fact discovery. The PLC provides no justification for general, corporate discovery to align with the close of the <i>supplemental</i> case-specific discovery reserved for the 4 bellwether trial cases.</p> <p data-bbox="1024 1623 1414 1877">Horizon proposed that corporate fact discovery close simultaneously with core discovery on December 20, 2024, prior to the January 17, 2025 recommendation for bellwether trial cases because</p>

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	<p>Horizon produced certain FDA Regulatory filings after being Ordered by the Court to do so. ECF No.: 106, PageID#: 1363 governs production of custodial files. Per that Order, Horizon did not certify its Wave 1 production until April 30, 2024—<i>ten days ago</i>. Custodial depositions flow from production of the custodian's file—meaning no custodial deposition could occur until after certification of a Wave production. That is particularly true given Defendant's representation that it intends corporate witnesses be deposed once—i.e., early deposition practice following production of the FDA regulatory documents would preclude future depositions <i>after</i> the PLC receive the witnesses' custodial file.</p> <p>Additionally, per ECF No.: 106 Horizon will complete Wave V and VI production on November 29, 2024, and December 30, 2024, meaning their proposal affords the PLC 67- and 36-days respectively to review, analyze, prepare for and take Wave V and VI custodians. To put this in perspective, the Wave I production included 176,764 documents comprised of 1,375,661 pages.</p>	<p>it informs bellwether trial selection. Horizon offered the PLC a compromise proposal for corporate fact discovery to close on February 14, 2025, so that most, if not all, corporate fact discovery would be completed prior to selection of the bellwether trial cases. The PLC rejected this proposal.</p> <p>With a close of corporate fact discovery on February 14, 2025, the PLC will have almost 16 months to complete corporate fact discovery from the time discovery started in this case. “By any measure, discovery in this case <i>started</i> on October 23, 2023, when Defendant made its first document production.” <i>See</i> The PLC's Response to Defendant's Proposed Schedule, at 4 (ECF No. 141) (emphasis in original).</p> <p>Pursuant to the parties' Stipulated Case Management Order Regarding General Document Production (ECF No. 106), Horizon has been producing custodial files on a rolling basis for up to 65 custodians, in 6 “waved” productions (12 custodians in each wave, limited to 5 custodians in the final wave).</p> <p>The PLC need not await completion of each waved production to conduct document review. Horizon has been producing</p>

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	<p>While the PLC intended to start deposition practice within 30-days of the Wave 1 production, it had no way of anticipating the first production would exceed one million pages based on Defendant's former counsel's representation regarding the scope of the anticipated document production during the in-person discovery conference before Magistrate Weisman. If the Wave 1 production is representative of future production, Defendant's proposal will require the PLC to review, analyze and evaluate nearly 6 million pages in 9.5 months (which does not contemplate the non-custodial production).</p> <p>Finally, despite multiple requests, Defendant failed to articulate how aligning corporate and case-specific discovery prejudices it, given a discovery alignment does not alter any proposed date in the schedule. This simple answer is that it does not, which is why the <i>Zimmer</i>, <i>TRT</i> and <i>NEC</i> courts aligned the close of corporate and case-specific discovery.</p>	<p>documents on a rolling basis. In addition, Horizon will complete the Wave II production early and offered to promptly start on Wave III if the PLC will expedite its selection of custodians for Wave III.</p> <p>Even if the Court accepts the PLC's argument that corporate discovery did not fully begin until production of custodial documents, Horizon started rolling production of custodial documents on February 22, 2024, almost a year before Horizon's proposed close of corporate discovery on February 14, 2025, a significantly longer period than that allotted in the schedule for core discovery of case-specific discovery in the 12 bellwether cases. The PLC's claim of surprise regarding the number of documents produced is not supportable. The PLC insisted that Horizon employ a broad set of 225 search terms (<i>see</i> ECF No. 100-1) and engage in only an extremely limited review for relevance (ECF No. 99, § F.2). The PLC persisted with those demands even after Horizon provided the PLC with an estimated yield of documents from an initial set of custodians that hit on the search terms requested, averaging 31,208 documents</p>

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		<p>per custodian (totaling 374,505 documents for 12 custodians, far more than the 176,764 documents produced in Wave I).</p> <p>The PLC requested productions from custodians in their preferred order of priority and stated its intent to request depositions within 30 days of each "waved" production. The PLC has thus far requested production from 24 document custodians and indicated it may not request production from all 65 custodians. The final "Wave VI" production of the final 5 custodial files is scheduled to be completed by December 30, 2024 (if requested).</p> <p>Even if the PLC requests the deposition of one of the final 5, last-prioritized custodians to be produced, Horizon's proposal allows at least 45 days from the date Horizon completes Wave VI discovery.</p> <p>The PLC's request that it be permitted 19 months to complete corporate fact discovery (by April 11, 2025), is inequitable, and inconsistent with its proposal that Horizon complete core discovery, including 48 depositions across 12 cases, in only 6 months.</p>

Deadline	PLC's Proposed Date	Horizon's Proposed Date
Close of Supplemental Fact Discovery for Bellwether Trial Cases:	April 10, 2025	April 10, 2025
Plaintiffs to Submit General and Case-Specific Expert Reports for 4 Bellwether Trial Cases	May 9, 2025	May 9, 2025
Defendant Submits General and Case-Specific Expert Reports for 4 Bellwether Trial Cases	June 9, 2025	June 9, 2025
Submission of Deposition Dates [Disputed]	<u>PLC's Position:</u> June 11, 2025—the parties will exchange two deposition dates for each of their expert over two separate weeks. The PLC contemplates a six-week period to conduct expert depositions. The PLC further proposes each party must offer dates during each week of the expert deposition time period so as to avoid back-loading deposition dates. A similar practice was adopted by Judge Kennelly in <i>TRT</i> .	N/A <u>Horizon's Position:</u> The PLC's proposal is not typical practice and will not facilitate timely completion of expert depositions. Horizon proposes the Court simply set a deadline for the close of expert discovery and the parties can determine the best way to complete depositions in advance of that deadline once they identify the number and location of experts identified by each party, without limiting the start of depositions.
Submission of Rebuttal Reports, if any	June 20, 2025	June 20, 2025
Close of Expert Discovery [Disputed]	Expert deposition period: June 23 – July 18, 2025. <u>PLC's Position:</u> The PLC opposes staggered depositions for four reasons: 1) there is no rule requiring	All expert depositions to be completed by July 18, 2025 <u>Horizon's Position:</u> As is typical practice under the Federal Rules of Civil Procedure, Horizon proposes

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	<p>plaintiff's experts be taken before defense experts; 2) Defendant's proposal contemplates depositions prior to receipt of the Defendant's report; 3) no MDL in NDIL has ever adopted a staggered deposition approach; because 4) in many instances the expert authoring the rebuttal report is the same to author the primary report. Horizon's proposal contemplates conducting plaintiff's expert deposition before completion of rebuttal reports.</p>	<p>that the Court enter a date for the close of expert discovery. The parties will determine how best to complete all depositions by that time. If any experts submit rebuttal reports within the permissible scope of Rule 26, the parties can complete those depositions within the time allotted. Delaying the start of depositions to a date certain will only delay completion of expert discovery, already within a compressed time period.</p>
<p>Parties to Submit Rule 702 Motions</p> <p>[Disputed as to proposed page limitations and font]</p>	<p>August 15, 2025</p> <p><u>PLC's Position:</u></p> <p>Parties to submit all 702 Motions related to general and case-specific causation. The Parties shall file one omnibus motion related to all experts, which shall be limited to 40 pages. Any Rule 702 Motions related to case-specific causation opinions shall be limited to a total of 25 pages for all Plaintiffs in Century Schoolbook Font.</p> <p><u>PLC's Position Regarding Page Limitations:</u></p> <p>The Court may impose reasonable page limitations on any motion. As Defendant notes, they intend to file Rule 702 motions individually. Assuming the PLC proffers 5-6 experts that means 75-90</p>	<p>August 15, 2025</p> <p><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p>See Horizon's position above.</p> <p>Horizon does not seek an exception to the Court's Case Procedures regarding page limits at this time. It is premature to address any exceptions regarding page limits until the parties disclose experts. Until then, the parties have no information as to the number of experts at issue, nor can they evaluate the grounds, if any, for Rule 702 motions as to each expert's opinions.</p> <p>Horizon additionally objects to the PLC's proposal that it is appropriate to brief an unknown number of case-</p>

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	<p>pages of briefing that will restate the same standard, cover the same law, and rely on many of the same facts, albeit in 5-6 separate briefs. Given the Court can impose page limitations, and Defendant refuses to negotiate any meaningful limits on briefing, the Court ought to adopt the PLC's proposal.</p>	<p>specific experts for four different plaintiffs, necessarily involving different case-specific facts and medical information, in a single motion.</p>
<p>Oppositions to Rule 702 motions due</p> <p>[Disputed as to proposed page limitations and fonts]</p>	<p>September 12, 2025</p> <p><u>PLC's Position:</u></p> <p>Parties to submit Opposition to Rule 702 Motion. The Parties shall submit one omnibus brief opposing the moving party's brief on issues of general causation limited to 50 pages in Century Schoolbook Font.</p> <p>See the PLC's position above.</p>	<p>September 12, 2025</p> <p><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p>See Horizon's position above.</p>
<p>Replies to Rule 702 Motions due</p> <p>[Disputed as to proposed page limitations, font, and reply limitations]</p>	<p>September 26, 2025</p> <p><u>PLC's Position:</u></p> <p>Parties to submit Replies in support of Rule 702 Motion. The Reply Brief related to general causation experts shall be limited to 15 pages in Century Schoolbook Font.</p> <p>The Reply brief related to case specific causation shall be limited to a total of 10 pages for all Plaintiffs.</p> <p>See the PLC's position above.</p>	<p>September 26, 2025</p> <p><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p>See Horizon's position above.</p> <p>Horizon additionally objects that the PLC proposes to drastically limit Horizon's ability to reply to Rule 702 motions, essentially eliminating Horizon's ability to reply to any motions involving case-specific experts, which necessarily</p>

Deadline	PLC's Proposed Date	Horizon's Proposed Date
		must be addressed individually.
Oral Argument on Rule 702 Motions	The PLC proposes the week of October 6–10, 2025	At the Court's discretion.
The Court anticipates Ruling on all Rule 702 Motions	At the Court's discretion, within 30 days of completion of briefing, on or about November 6, 2025.	At the Court's discretion, within 30 days of completion of briefing, on or about November 6, 2025.
Court-Ordered Conference Regarding Motions for Summary Judgment	At the Court's discretion, on or before October 15, 2025	At the Court's discretion, on or before October 15, 2025
<p data-bbox="203 804 581 905">Summary Judgment Motions due for 4 Initial Bellwether Trial Cases</p> <p data-bbox="203 1010 542 1079">[Disputed as to proposed page limits and font]</p>	<p data-bbox="613 804 841 835">October 29, 2025</p> <p data-bbox="613 867 824 898"><u>PLC's Position:</u></p> <p data-bbox="613 940 997 1041">The brief shall be limited to a total of 20 pages in Century Schoolbook Font.</p> <p data-bbox="613 1083 997 1367">Given the Court requires the parties articulate the basis for any motion for summary judgment, the briefing should be well thought out by the Summary Judgment Conference and distilled to limited issues.</p> <p data-bbox="613 1409 997 1440">See the PLC's position above.</p>	<p data-bbox="1024 804 1252 835">October 29, 2025</p> <p data-bbox="1024 867 1414 968"><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p data-bbox="1024 1010 1414 1041">See Horizon's position above.</p> <p data-bbox="1024 1083 1398 1325">Horizon proposes the parties address page limits on summary judgment briefing, if needed, at the Court-Ordered Conference Regarding Summary Judgment.</p> <p data-bbox="1024 1367 1398 1692">It is premature to address any exceptions to the Court's Case Procedures regarding page limits until the Court selects the Bellwether Trial Cases and Horizon has the opportunity to evaluate the grounds for summary judgment in each case.</p> <p data-bbox="1024 1734 1414 1829">Horizon further objects to the PLC's inequitable proposal to limit Horizon's motions to 20</p>

Deadline	PLC's Proposed Date	Horizon's Proposed Date
		pages but allow 25 pages for the PLC's oppositions.
<p>Oppositions to Summary Judgment Motions due for 4 Initial Bellwether Trial Cases</p> <p>[Disputed as to proposed page limitations and font]</p>	<p>November 24, 2025</p> <p><u>PLC's Position:</u></p> <p>Parties to submit Opposition briefs to Summary Judgment. The brief responding to the Motion shall not exceed 25 pages in Century Schoolbook Font. See above.</p>	<p>November 24, 2025</p> <p><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p>See Horizon's position above.</p>
<p>Replies to Summary Judgment Motions due for 4 Initial Bellwether Trial Cases</p> <p>[Disputed as to proposed page limitations, font, and reply limitations]</p>	<p>December 12, 2025</p> <p><u>PLC's Position:</u></p> <p>The reply brief shall be limited to 10 pages in Century Schoolbook Font. See above.</p>	<p>December 12, 2025</p> <p><u>Horizon's Position Regarding the PLC's Proposed Page Limits and Font:</u></p> <p>See Horizon's position above.</p>
<p>The issues related to Summary Judgment motions will be ripe for oral argument on or after</p>	<p>The PLC proposes the Court hear Oral Argument the week of December 16 –20, 2025</p>	<p>At the Court's discretion</p>
<p>The Court anticipates Ruling on any Summary Judgment Motions</p>	<p>At the Court's discretion, within 60 days of completion of briefing.</p>	<p>At the Court's discretion, within 60 days of completion of briefing.</p>
<p>Final Pretrial Case Management Conference</p>	<p>February 10-13, 2026</p> <p><u>PLC's Position:</u> The Court will set forth a schedule regarding deposition designations, exhibit lists and Motions in Limine at the Final Pretrial Conference. To the extent the Court intends for the parties to supply those dates now, the PLC proposes the schedule set forth below.</p>	<p>Horizon takes no position and defers to the Court's discretion.</p>

Deadline	PLC's Proposed Date	Horizon's Proposed Date
Motions in <i>Limine</i> re First Bellwether Trial plaintiff	February 16, 2026	February 16, 2026
Responses to Motions in <i>Limine</i> re First Bellwether Trial Plaintiff	February 23, 2026	February 23, 2026
Final Pretrial Memorandum re First Bellwether Trial Plaintiff	February 23, 2026	February 23, 2026
Final Pretrial Conference re First Bellwether Trial Plaintiff	March 2, 2026	March 2, 2026
Final Pretrial Conference follow-up (if necessary)	March 3, 2026	March 3, 2026
First Bellwether Plaintiff Trial (3-4 weeks)	March 9, 2026	March 9, 2026
Second Bellwether Plaintiff Trial (3-4 weeks)	May 4, 2026	May 4, 2026
Third Bellwether Plaintiff Trial (3-4 weeks)	June 29, 2026	June 29, 2026
Fourth Bellwether Plaintiff Trial (3-4 weeks)	August 24, 2026	August 24, 2026

Dated: May 10, 2024

Respectfully Submitted,

/s/ Trent B. Miracle

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CERTIFICATE OF SERVICE

I certify that on May 10, 2024, a copy of the foregoing Joint Proposed Schedule was filed using the CM/ECF filing system, which will send notice of electronic filing to all parties appearing on the Court's ECF service list.

/s/ Robert E. Johnston

Counsel for Horizon Therapeutics USA, Inc.