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February 14, 2025

**VIA ECF**

Honorable Renée Marie Bumb  
United States District Court  
Mitchell H. Cohen Building and  
U.S. Courthouse  
Courtroom 3D  
4<sup>th</sup> and Cooper Streets  
Camden, New Jersey 0810

Honorable Thomas I. Vanaskie (Ret.)  
Special Master  
Stevens & Lee  
1500 Market St., East Tower,  
Suite 1800  
Philadelphia, Pennsylvania 19103

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***  
**Case No. 1:19-md-02875-RBK (D.N.J.)**

Dear Chief Judge Bumb and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs regarding the schedule for the  
Wave 2 bellwether pool.

Plaintiffs propose that the Wave 2 trial at the end of 2025 be a multi-plaintiff  
trial, which will be more efficient. Scheduling a multi-plaintiff trial will also address  
Defendants' concern that a case may drop out before trial, leaving an additional case  
or cases ready for trial in that event.

Honorable Renée Marie Bumb, U.S.D.J.  
Honorable Thomas I. Vanaskie (Ret.)  
February 14, 2025  
Page 2

Plaintiffs have attached a proposed schedule for the multi-plaintiff trial, with the most important date being for the service of case-specific expert reports, which require a complete factual record and significant additional time and work in order to complete, also showing Plaintiffs' understanding of Defendants' proposed deadlines. (Ex. 1). Although the briefing schedule and later pretrial events partially overlap with the Roberts trial, the Parties and Court will have the benefit of the Roberts rulings by that time, which will allow the Court to more efficiently address the legal issues for the Wave 2 trial.

We look forward to discussing the Wave 2 schedule with the Court.

Respectfully,



ADAM M. SLATER

Cc: All counsel of record (via ECF)

Encl.

# Exhibit 1

<b>Roberts Trial Event</b>	<b>Roberts Date</b>	<b>Plaintiffs' Proposal for Wave 2 Trial Event/Date</b>	<b>Defendants' Proposal for Wave 2 Trial Event/Date</b>
Deadline to amend Plaintiff Fact Sheet	12/2/2024	3/14/2025	2/28/2024
Close of case-specific fact discovery	2/14/2025	5/2/2025	4/14/2025
Deadline for Plaintiff to designate experts and serve expert report(s)	2/28/2025	5/16/2025	4/14/2025
Deadline for Defendants to designate experts and serve expert report(s)	3/31/2025	6/16/2025	5/12/2025
Depositions of experts	4/1/2025-4/28/2025	6/16/2025 – 7/31/2025	5/13/2025 – 6/13/2025
Close of expert discovery	4/28/2025	7/31/2025	6/13/2025
Deadline for parties to exchange deposition designations	5/1/2025	7/31/2025 (Completion of rolling exchange)	7/18/2025
Deadline to file: (i) Rule 702 motions; and (ii) summary judgment motions	5/12/2025	8/22/2025	6/27/2025
Deadline to submit deposition designations, objections, and counter-designations to the Court	5/30/2025	8/29/2025	8/29/2025
Deadline to file oppositions to: (i) Rule 702 motions; and (ii) summary judgment motions	6/16/2025	9/15/2025 (Rule 702) 9/22/2025 (Summary Judgment)	7/25/2025
Deadline to file replies in further support of: (i) Rule 702 motions; and (ii) summary judgment motions	7/2/2025	None	8/15/2025
Parties to submit (joint or separate if no agreement) position statement(s) to Court on proposed selection of Wave 2 bellwether trial case	None	Not needed for multi-plaintiff trial	1-week after the Court's ruling on Rule 702/MSJs
Deadline to file motions in limine	7/14/2025	28 days before trial	9/17/2025
Deadline to file oppositions to motions in limine	7/31/2025	14 days before trial	10/1/2025
Deadline to submit joint final pretrial order	8/11/2025	None	10/10/2025
Deadline to file pretrial briefs	8/14/2025	9 days before trial	10/13/2025

Deadline to file: (i) joint proposed jury instructions; (ii) joint proposed jury questionnaire; and (iii) joint verdict sheet	8/18/2025	9 days before trial	10/17/2025
Deadline to file responsive papers to pre-trial briefs	8/21/2025	None	10/20/2025
Deadline to submit: (i) witness lists; and (ii) exhibit lists	8/26/2025	9 days before trial	10/27/2025
Pretrial conference (via Zoom)	8/28/2025	7 days before trial	10/29/2025
Trial begins	9/8/2025	TBD	November 2025