

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE SUBOXONE	)	Case No. 1:24-md-03092-JPC
(BUPRENORPHINE/NALOXONE)	)	
FILM PRODUCTS LIABILITY	)	MDL 3092
LITIGATION	)	
This Document Applies to All Cases	)	Judge J. Philip Calabrese

**JOINT AGENDA FOR MARCH 11, 2025 CASE-MANAGEMENT CONFERENCE**

Counsel have conferred and respectfully propose the following topics for discussion:

1. Plaintiff-centered Discovery
  - a. Census Protocol
    - i. Update on process to date
      1. Revised Schedule A submitted on March 7
      2. Census forms completed
  - b. Bellwether Protocol
    - i. Progress to date.
    - ii. Absent agreement, respective proposed protocols to be submitted on March 10 at 9:00 a.m. C.T.
2. Defendant-centered Discovery
  - a. Status of negotiation on search terms
    - i. Parties to complete working session with Court on March 10 to finalize any remaining disputes as to Indivior, discussion regarding which remain ongoing.
    - ii. Hit report for Aquestive custodians.

- b. Production and Deposition Protocol
    - i. Parties' positions on caps
    - ii. Initial custodians identified by PLC on February 14, 2025
    - iii. Options for informing and streamlining process of custodian identification
      - 1. PLC will serve 30(b)(6) on custodians this month
      - 2. Request from PLC for Defendants to complete chart of undisclosed custodians prepared by PLC through its own research
      - 3. Request from PLC to produce additional testimony from prior litigation regarding Suboxone Film.
  - c. Sublocade regulatory file.
  - d. Adverse-event reports.
3. Newly filed cases
- a. Update on filing status
  - b. Update on agreement to Stipulated Order on Joinder Complaints/bundling

Dated: March 7, 2025

Respectfully submitted,

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