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March 13, 2025

VIA ECF

The Honorable Renée Marie Bumb
United States District Court Judge
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

**Re: *In re: Valsartan, Losartan, and Irbesartan Products Liability
Litigation.*, U.S. District Court for the District of New Jersey; Case
No. 1:19-md-02875**

Dear Judge Bumb:

Following meet and confers between the parties and as discussed with the Court during the March 3, 2025 Case Management Conference, attached is the parties' proposed Case Management Order establishing a product identification show cause process for manufacturer defendants. Please let us know if there is anything else that Your Honor requires and thank you once again for your careful consideration of these issues.

Sincerely,

/s/ Steven M. Harkins
Steven M. Harkins

Enclosure

cc: All counsel of record (*via ECF*)

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Hon. Renée Marie Bumb
Chief Judge U.S. District Court

This Document Relates to:
All Cases

No. 1:19-md-2875-RMB-SAK

**CASE MANAGEMENT ORDER NO. ___ ESTABLISHING MANUFACTURER
DEFENDANT PRODUCT IDENTIFICATION SHOW CAUSE PROCESS**

For individual personal injury matters in which a Requesting Manufacturer Defendant entity is named in the operative Complaint but there is no documentary evidence identifying Plaintiff product usage attributable to the Requesting Manufacturer Defendant(s)' manufacture and/or sale of any at issue product, Requesting Manufacturer Defendants shall serve notice of the deficiency via MDL Centrality to the individual Plaintiff.¹ The notice shall state the basis for the request, and all named Requesting Manufacturer Defendants seeking dismissal on this basis.

If the dispute is not resolved within 30 days of the notice by way of either withdrawal of the deficiency or voluntary dismissal of the Requesting Manufacturer Defendant, Defendants shall put the dispute on the agenda for the next case management conference. If a case appears on the agenda for two case management conferences, the Defendants may request that an Order to Show Cause be entered as to the delinquent party. That Order to Show Cause shall be returnable at the next case management conference and require the delinquent party to show cause why the Complaint should not be dismissed with prejudice as to the Requesting Manufacturer Defendant(s).

The parties will also hold a monthly global meet and confer prior to the monthly case management conferences to address any ongoing disputes before bringing them to the Court's attention. A deficiency list shall be served by Defendants on Plaintiff leadership no later than five days prior to the meet and confer.

ORDERED this ___ day of March, 2025

HON. RENÉE MARIE BUMB
CHIEF UNITED STATES DISTRICT JUDGE

¹ A Defendant's decision not to seek dismissal under this CMO shall not constitute evidence that any specific claims are properly brought and/or supported by sufficient evidence, nor shall it be deemed a waiver of a Defendant's right to subsequently move for dismissal and/or summary judgment on any grounds.