

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE: PARAGARD IUD)	MDL DOCKET NO. 2974
PRODUCTS LIABILITY)	
LITIGATION)	
)	(1:20-md-02974-LMM)
)	This Document Relates to All Cases

**CASE MANAGEMENT ORDER REGARDING
CUSTODIAL FILE PRODUCTION**

Plaintiffs and Defendants, through their respective undersigned counsel, having met and conferred regarding the schedule for custodial file production, have agreed to the following Order, which the Court hereby enters:

1. Defendants will complete production of the custodial files from all relevant Defendants for Thomas Mehs and Jennifer Gates on or before November 30, 2022. Privilege logs for both files will be completed by all relevant Defendants and produced to Plaintiffs on or before December 30, 2022.

2. Should a difficulty be encountered in meeting a specified date or should other issues arise with respect to custodial items, the parties shall meet and confer in good faith to find a mutually acceptable alternative or solution prior to raising the matter with the Court. The parties agree that for every day Plaintiffs' custodial file request passes a submission date specified below, the Defendants shall have an equal number of days added to the applicable production deadline for that custodian.

3. For purposes of this Order, if an individual whose custodial file is requested by Plaintiffs worked for one or more of the Teva Defendants and/or one or more of the Cooper Defendants on Paragard, that individual shall be considered as one custodian.

4. Subject to the foregoing, custodial file items shall be requested, collected, and produced as follows:

a. Custodial File Request #1:

- i. The parties have agreed that six (6) of the first twenty (20) custodial files to be produced are the following: Valerie Mulligan (Teva custodial file), Susan Larijani (Teva custodial file), Paul Wasielewski (Teva custodial file), Vrunda Desai (Cooper custodial file), James Keller (Cooper custodial file), and Gary Tschamber (Cooper custodial file). On October 26, 2022, Plaintiffs submitted an additional fourteen (14) names to Defendants collectively for whom custodial files are requested.
- ii. Defendants have up to and including 75 days from October 26, 2022 (i.e., up to and including January 9, 2023) to produce relevant items from the custodial files identified and requested in Section 4(a)(i). Defendants shall have up to and including 45 days from January 9, 2023 to produce privilege logs for all custodial files requested in Section 4(a)(i) (i.e., up to and including February 23, 2023).

b. Custodial File Request #2

- i. Plaintiffs may submit no more than twenty (20) names to Defendants collectively for which the next set of custodial files are requested.

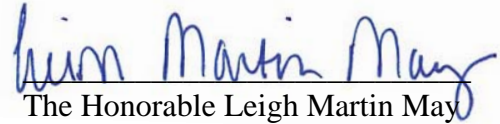
- ii. If such files are requested on or before January 9, 2023, Defendants shall have up to and including seventy-five (75) days from January 9, 2023 (i.e., up to and including March 27, 2023) to produce relevant items. Defendants shall have up to and including 45 days from March 27, 2023 to produce privilege logs for the custodial files requested in Section 4(b) (i.e., up to and including May 11, 2023).
- iii. If any such files are requested after January 9, 2023, Defendants shall have up to and including seventy-five (75) days from the date such files were requested to produce relevant items. Defendants shall have up to and including 45 days after the deadline for production of such custodial files to produce privilege logs for those custodial files.

c. **Custodial File Request #3:**

- i. Plaintiffs may submit no more than ten (10) names to Defendants collectively for which the next set of custodial files are requested.
- ii. If such files are requested on or before March 27, 2023, Defendants shall have up to and including sixty (60) days from March 27, 2023 (i.e., up to and including May 26, 2023) to produce relevant items. Defendants shall have up to and including 45 days from May 26, 2023 to produce privilege logs for the custodial files requested in Section 4(c)(i) (i.e., up to and including July 10, 2023).
- iii. If any such files are requested after March 27, 2023, Defendants shall have up to and including sixty (60) days from the date such files were requested to produce relevant items. Defendants shall have up to and

including 45 days after the deadline for production of such custodial files
to produce privilege logs for those custodial files.

SO ORDERED, this the 21st day of November, 2022.

A handwritten signature in blue ink that reads "Leigh Martin May". The signature is written in a cursive style with a horizontal line drawn across the middle of the name.

The Honorable Leigh Martin May
United States District Judge
Northern District of Georgia