

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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**IN RE: PROTON-PUMP INHIBITOR  
PRODUCTS LIABILITY LITIGATION**

**2:17-MD-2789 (CCC)(MF)  
(MDL 2789)  
and all member and related cases**

**This Document Relates to: ALL ACTIONS**

**Judge Claire C. Cecchi**

**CASE MANAGEMENT ORDER NO. 16  
ON JUNE 12, 2018 STATUS  
CONFERENCE**

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The Court having held a case management conference on June 12, 2018, and after reviewing the parties' submissions and having discussed various case management issues with the parties, enters the following ORDER:

1. The first PPI trial in this MDL will commence on September 21, 2020. By June 26, 2018, the parties shall submit an agreed-to Scheduling Order relative to this trial reflective of the parties' agreements and the Court's directives discussed at the case management conference.

2. The PSC and AstraZeneca Defendants have agreed to presumptive limits ("soft caps") on discovery, which includes 140 custodial productions and 55 common witness depositions, this number excluded 30(b)(6) deponents. By June 19, 2018, the parties shall submit an agreed-to Document Production Schedule setting out the agreement between the PSC and AstraZeneca reached prior to the case management conference.

3. Following oral argument, the Court ordered "soft caps" on discovery for the Takeda Defendants, which includes 135 custodial productions and 50 common witness depositions, this number excluded 30(b)(6) deponents. By June 26, 2018, the parties shall submit an agreed-to Document Production Schedule related to the Takeda Defendants document

production timeline.

4. The PSC and Pfizer/Wyeth Defendants have agreed to “soft caps” on discovery, which includes 80 custodial productions and 30 common witness depositions. By June 26, 2018, the parties shall submit an agreed-to Document Production Schedule related to the Pfizer/Wyeth Defendants document production timeline.


5. The PSC and Procter & Gamble Defendants have agreed to “soft caps” on discovery, which includes 50 custodial productions and 25 common witness depositions. By June 26, 2018, the parties shall submit an agreed-to Document Production Schedule, related to the Procter & Gamble Defendants document production timeline.

6. The parties reported that they have reached agreement on the form of the Defendant Fact Sheet (“DFS”) with the AstraZeneca, Takeda, Pfizer/Wyeth, and Procter & Gamble Defendants. By July 20, 2018, the parties shall submit an agreed to DFS Enabling Order or if they are unable to agree, they shall submit letters setting forth their respective positions.

7. The Court has scheduled an in-person status conference for July 24, 2018 at 1 p.m. The parties shall submit a joint status report and agenda for that conference by July 20, 2018.

SO ORDERED:

Dated: Newark, New Jersey  
June 20, 2018

  
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CLAIRE C. CECCHI  
United States District Judge