

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON : Civil Action No. 3:16-md-2738-FLW-
TALCUM POWDER PRODUCTS : LHG
MARKETING, SALES PRACTICES :
AND PRODUCTS LIABILITY : MDL No. 2738
LITIGATION :
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**STATUS REPORT AND PROPOSED JOINT AGENDA
FOR JANUARY 24, 2019 STATUS CONFERENCE**

I. STATUS OF EXPERT DISCOVERY

Depositions of Plaintiffs' experts are underway. As of January 21, 2019, eight have been completed, one was started, and fourteen remain to be taken, with dates set between January 22 and February 7. Judge Pisano continues to address the disputes that have arisen as to documents related to studies or experiments that have been performed by Plaintiffs' experts including a published study (*Identification of Foreign Particles in Human Tissue Using Ramen Microscope*, Analytical Chemistry, June 2018) which was funded by Plaintiffs' counsel.

On January 11, 2019, the J&J Defendants provided dates for the depositions of all of their potential experts. Plaintiffs' supplemental expert report from Drs. Rigler and Longo were provided to counsel on January 16, 2019. Plaintiffs served an addendum to the report of Dr. Mark Krekeler on January 17, 2019 and an amended report for Dr. Robert Cook on January 22, 2019.

Pursuant to the Court's directives at the September 27 and November 28, 2018 status conferences, Defendants served their preliminary general causation expert lists on January 11, 2019.

II. GENERAL DISCOVERY ISSUES

There are some issues relating to both the production and privilege issues. However, in light of the ongoing expert deposition schedule, the parties will continue to confer and will report to the Court if any issues arise.

III. PSC'S APPEAL OF SPECIAL MASTER'S DECISION REGARDING IMERYS' DEMAND TO CLAWBACK DOCUMENT

Currently pending before Your Honor is the PSC's appeal of Special Master Pisano's ruling granting Imerys' request for the claw back of certain personal communications of an Imerys employee.

On January 15, 2019, the Court asked Imerys to provide additional information on this issue in order to supplement the record. Imerys' response is due January 22, 2019. The PSC's response to Imerys' supplementation is due on January 23, 2019.

IV. STATUS OF CASES RE-FILED IN THE MDL PER CMO 8

There are 67 cases where Plaintiffs who were previously part of a multi-plaintiff complaint have filed short form complaints in this MDL proceeding but have not complied with CMO 8 in either serving the short form complaint on Defendants or filing a notice of filing on the master docket. *See* CMO 8, ¶¶ 1 and 5 (requiring plaintiffs to file short form complaints pursuant to CMO 2 and to serve these complaints pursuant to CMO 3); *see also* CMO 3, ¶¶ 3 and 4 (requiring filing of an ECF notice if the original service of process was proper or requiring service of process where the original complaint was not properly served).

There are also 715 plaintiffs from multi-plaintiff cases pending in the MDL who have not filed Short Form Complaints pursuant to CMO 8. In seven cases involving approximately 386 plaintiffs, motions to remand are pending and the filing of a Short Form Complaint is not appropriate at this time. Of the 715 who have not refiled an individual single plaintiff case in the MDL, 145 have refiled in non-MDL jurisdictions. The majority of these plaintiffs have re-filed in California and New Jersey per an agreement between Defendants and the PSC. The parties will work to submit an order dismissing these duplicate filed cases in the MDL, as it has been determined that jurisdiction in the MDL is not proper in these instances. For any cases that have been refiled outside of the agreement between the PSC and

Defendants, Defendants will work with plaintiffs' counsel in that particular case to get one case dismissed.

V. DUPLICATE FILED CASES

There are 38 plaintiffs in this MDL who have multiple cases pending. The PSC made a request on January 19, 2019 for a listing of the duplicative filings and Defendant responded on January 20 with a list of duplicative cases that require review and discussion. The parties will work together to address any outstanding issues.

VI. REPORT ON FEDERAL DOCKET

As of January 8, 2019:

- A. There are currently 9,347 cases pending in the MDL in which the Johnson & Johnson Defendants have been served or in which Plaintiffs from multi-plaintiff cases pending in the MDL have filed Short Form Complaints on individual dockets and have not served the Johnson & Johnson Defendants (and have opened case numbers), totaling 10,023 Plaintiffs (including 675 Plaintiffs in 40 multi-plaintiff cases removed from Missouri state court that have not filed Short Form Complaints on individual dockets, 11 Plaintiffs in *Harders* removed from Illinois state court that have not filed Short Form Complaints on individual dockets, 2 Plaintiffs in *Lovato* removed from New Mexico state court that have not filed Short Form Complaints on individual dockets, 1 Plaintiff in *Robb* removed from Oklahoma state court that has not filed Short Form Complaints on individual dockets, 2 Plaintiffs from the *Crenshaw* case from the Middle District of Georgia that have not filed Short Form Complaints on individual dockets, and 24 Plaintiffs from the *Flores-Rodriguez* case from the District of Puerto Rico).

Individual Plaintiffs in the multi-plaintiff cases are in the process of filing Short Form Complaints on individual dockets. Thus far, all of the individual Plaintiffs in the following multi-plaintiff cases have filed Short Form Complaints on individual dockets: *Karen Glenn, et al.* and *Mary Rea, et al.* (one *Rea* Plaintiff, Exia Monroe, a New Jersey resident, has re-filed in New Jersey state court). Additionally, all of the individual Plaintiffs in the *Charmel Rice, et al.* and *Lillie Lewis, et al.* multi-plaintiff

cases have filed Short Form Complaints on individual dockets, except individual Plaintiffs Charmel Rice and Lillie Lewis.

There are seven Plaintiffs named as the lead Plaintiffs in multi-plaintiff cases who did not refile Short Form Complaints on individual dockets, but filed a Short Form Complaint in their corresponding multi-plaintiff case dockets. These include the lead Plaintiffs from four multi-plaintiff cases removed from Missouri state court (*Brenda Anderson, et al.*, *Lillie Lewis, et al.*, *Charmel Rice, et al.*, and *Jerie Rhode, et al.*), Marie Robb in the *Robb* case removed from Oklahoma State, and Deborah Crenshaw from the *Crenshaw* case originally filed in the Middle District of Georgia, and Samary Flores-Rodriguez in the *Flores-Rodriguez* case transferred from the District of Puerto Rico.

- B.** There are currently two multi-plaintiff cases removed from Missouri state court and pending in the Eastern District of Missouri, discussed below, that the JPML has not yet transferred into the MDL totaling 149 plaintiffs). Motions to dismiss and motions to remand have been filed in these cases.

The cases pending in the Eastern District of Missouri are listed below along with the judge to whom they are presently assigned.

Judge Rodney W. Sippel

McConnell, Laura, et al. v. Johnson & Johnson, et al., Case No. 4:18-cv-02083-RWS

Judge Ronnie L. White

Tashay Benford, et al. v. Johnson & Johnson, et al., Case No. 4:18-cv-01903-RLW

- C.** There are a handful of single-plaintiff cases that have been on CTOs and will be transferred in the near future to the MDL. These cases would not greatly affect the number of cases pending in the MDL absent the plaintiffs in the multi-plaintiff cases.

VII. STATE COURT LITIGATION

As of January 8, 2019:

California: There are approximately 584 ovarian cancer cases involving 637 plaintiffs pending in the California coordinated proceeding, *Johnson & Johnson Talcum Powder Cases*, Judicial Council Coordinated Proceeding No. 4877. These cases are assigned to Judge Maren E. Nelson, Los Angeles Superior Court. To date, a *Sargon* hearing has been held, and one case—*Echeverria*—proceeded to trial. Prior to that trial, on July 10, 2017, the court granted Imerys’ motion for summary judgment, dismissing all claims against Imerys as to the *Echeverria* case only. The *Echeverria* trial resulted in a plaintiff verdict against the Johnson & Johnson Defendants; however, on October 20, 2017, the Court granted the Johnson & Johnson Defendants’ motions for judgment notwithstanding the verdict and, alternatively, for a new trial. Elisha Echeverria, Acting Trustee of the 2017 Eva Echeverria Trust, filed her Notice of Appeal on December 18, 2017. The Johnson & Johnson Defendants filed their Cross-Notice of Appeal on January 4, 2018. Appellants’ Opening Brief was filed on July 18, 2018, and Respondents’ and Cross-Appellants’ Brief was filed on November 26, 2018.

On May 3, the Court ordered the J&J Defendants to file their Motion to Quash as to the non-California Plaintiffs on personal jurisdictional grounds before ruling on Plaintiffs’ request for jurisdictional discovery. Plaintiffs filed their amended master complaint on May 14, 2018. Defendants filed their motion to quash Plaintiffs’ Second Amended Complaint on June 29, 2018. The Court further ordered that once the J&J Defendants filed their Motion to Quash the non-California Plaintiffs. Plaintiffs must submit a proposed jurisdictional “discovery plan” by July 16, 2018 “specifically outlining the discovery [Plaintiffs’ Executive Committee] requires to oppose the motion(s) and how it has a tendency to show that specific jurisdiction may be exercised” over the J&J Defendants. Pursuant to the Court’s order, Plaintiffs submitted their discovery plan. On August 15, 2018, also pursuant to the Court’s order, Plaintiffs filed a second motion seeking jurisdictional discovery. To date, general discovery (liability and causation) as well as jurisdictional discovery has not yet been ordered in the JCCP. A case management conference is scheduled for January 25, 2019, which will include a hearing to discuss Plaintiffs’ Motion to Conduct Jurisdictional Discovery.

Delaware: There are currently 196 cases pending in the Superior Court of Delaware in which the Johnson & Johnson Defendants have been served. All of the Delaware cases have been consolidated before the Hon. Charles E. Butler. On

January 19, 2017, the Johnson & Johnson Defendants filed a motion to dismiss for lack of personal jurisdiction. On January 31, 2017, Plaintiffs served jurisdictional discovery. On March 2, 2017, the Johnson & Johnson Defendants filed a motion for protective order to quash the jurisdictional discovery. On September 10, 2018, the Court granted Johnson & Johnson and Johnson & Johnson Consumer Inc.'s motion to dismiss the claims of nonresident plaintiffs based on lack of personal jurisdiction and, therefore, dismissed the nonresident plaintiffs' claims against the Johnson & Johnson Defendants. On the same day, the Court also granted the Johnson & Johnson Defendants' motion for a protective order to quash the nonresident plaintiffs' jurisdictional discovery requests. On October 26, 2018, the Court denied Plaintiffs' motion for re-argument. The Johnson & Johnson Defendants and Plaintiffs are in the process of executing a re-filing agreement such that all nonresident plaintiffs' claims will be dismissed and refiled in the MDL or New Jersey MCL.

Missouri: There are currently 14 cases, with a total of 583 plaintiffs pending in the 22nd Judicial Circuit Court, St. Louis (City) in which Defendants have been served.

Trial in the case of *Daniels v. Johnson & Johnson, et al.* resulted in a defense verdict on March 3, 2017 (individual claim filed in the multi-plaintiff *Valerie Swann* matter). Plaintiffs did not appeal.

Appeals are pending from judgments against the Johnson & Johnson Defendants and Imerys in the *Deborah Giannecchini* and *Lois Slemper* cases and against the Johnson & Johnson Defendants in the multi-plaintiff *Gail Ingham, et al.* case.

Trial in the case of *Michael Blaes on behalf of Shawn Blaes v. Johnson & Johnson, et al.* before Judge Rex Burlison is currently stayed and briefing on Defendants' petitions for writs of prohibition is pending before the Missouri Supreme Court on venue challenges. Oral argument took place on February 27, 2018. On March 2, 2018, the Missouri Supreme Court issued amended preliminary writs of prohibition ordering that Judge Burlison may proceed only with a determination of jurisdiction, but can take no other action until further order by the Missouri Supreme Court. The next hand down date from the Missouri Supreme Court is January 29, 2019

In the *Lois Slemper* case, that trial court found that plaintiffs had established personal jurisdiction exists in Missouri state court over the objections of Johnson &

Johnson defendants and Imerys. The *Slemp* case is on direct appeal to the Missouri Court of Appeals.

On October 17, 2017, the Missouri Court of Appeals, Eastern District, reversed and vacated the judgment in the *Jacqueline Fox* case for lack of personal jurisdiction. (Imerys, having received a defense verdict, was not part of the appeal.) The Court also rejected Plaintiff's request to remand the case to the trial court to attempt to establish jurisdictional facts. On December 19, 2017, the Court denied Plaintiff's Motion for Rehearing. On March 6, 2018, the Missouri Supreme Court denied Plaintiff's requested review of the decision. On March 12, 2018, the Missouri Court of Appeals issued the mandate. On March 30, 2018, the trial court entered an order enforcing the mandate from the appellate court that the *Fox* judgment be reversed and vacated for lack of personal jurisdiction. On November 13, 2018, the *Fox* case was refiled in the MDL.

On June 29, 2018, consistent with the Court's opinion and ruling in *Fox*, the Missouri Court of Appeals, Eastern District, reversed and vacated the judgment in the *Gloria Ristesund* case for lack of personal jurisdiction. (Imerys, having received a defense verdict, was not part of the appeal.) Consistent with the *Fox* opinion, the Court also rejected Plaintiff's request to remand the case to the trial court to attempt to establish jurisdictional facts. On August 7, 2018, the Missouri Court of Appeals, Eastern District, denied Plaintiff's application for transfer to the Missouri Supreme Court. On October 30, 2018, the Missouri Supreme Court denied Plaintiff's application to transfer the case from the Missouri Court of Appeals.

On December 27, 2018, the Missouri Supreme Court issued a Preliminary Writ of Prohibition against The Honorable Rex M. Burlinson prohibiting him from taking any further action against Imerys in the matter of *Vicki Forrest, et al. v. Johnson & Johnson, et al.* until such time as the Missouri Supreme Court could hear argument from Imerys as to whether the State of Missouri holds proper jurisdiction over Imerys. As a result, the trial that was scheduled to begin on January 21, 2019 in the *Forrest* matter was stayed as to Imerys. Earlier, (on January 9, 2019), the Missouri Supreme Court denied Johnson & Johnson Defendants' Petition for Writ of Prohibition in the *Forrest* matter on the issue of personal jurisdiction.

On January 14, 2019, the Missouri Supreme Court issued a Preliminary Writ of Prohibition against The Honorable Rex M. Burlinson prohibiting him from taking any further action against the J&J Defendants in the matter of *Vicki Forrest, et al. v. Johnson & Johnson, et al.* until such time as the Missouri Supreme Court could hear argument from the J&J Defendants as to whether the City of St. Louis was the proper

venue for the case. As a result, the trial that was scheduled to begin on January 21, 2019 in the *Forrest* matter was stayed in its entirety.

The St. Louis Court has set the following trial dates in the following cases:

January 21, 2019 – Trial in *Vicki Forrest, et al. v. Johnson & Johnson, et al.* (*stayed*)

April 8, 2019 – Trial in *Tracey Young, et al. v. Johnson & Johnson, et al.*

August 5, 2019 – Trial in *Leewing Loyd, Sr., et al. v. Johnson & Johnson, et al.*

October 7, 2019 – Trial in *Tenesha Farrar, et al. v. Johnson & Johnson, et al.*

New Jersey: There are currently 513 cases pending in the Atlantic County Superior Court Multicounty Litigation, *In re: Talc-Based Powder Products Litigation*, Case No. 300. The coordinated proceedings were jointly assigned to Judges Johnson and Mendez by the New Jersey Supreme Court, and with Judge Johnson's retirement, the parties expect that they will continue to be managed by Judge Mendez pursuant to the Supreme Court Order. The cases are currently stayed for discovery purposes pending resolution of the plaintiffs' appeal of the ruling by Judge Johnson on the *Kemp* issues. On January 8, 2018, the New Jersey Appellate Division issued a *Sua Sponte* Order staying the appeals for six months or until the New Jersey Supreme Court decides the appeal pending in *In re: Accutane Litigation*, A-25-17, 079958, and *In re: Accutane Litigation*, A-26/27-17, 079933. Oral argument occurred in the Accutane Litigation on April 23, 2018. On August 1, 2018, the New Jersey Supreme Court affirmed the trial court's decision in the *Accutane Litigation*, and held that the *Daubert* factors are incorporated into New Jersey's Rule 702 analysis of the reliability of expert testimony. The stay has since been lifted in the *Balderrama* and *Carl* cases and the Appellate Division requested that the parties submit supplemental briefing on certain discreet issues, which was completed on October 26th. Briefing is now complete.

Florida: There are nineteen cases pending in Florida state court. There are five cases pending in Broward County, Florida, including three cases before Judge Michael A. Robinson, one case before Judge David Haimen, and one case before Judge Sandra Periman. There are four cases pending in Miami-Dade County, Florida, including one case before Judge Michael Hanzman, one case before Judge Dennis Murphy, one case before Maris de Jesus Santovenia, and one case before Judge Barbara Areces. The case before Judge Hanzam in Miami-Dade County is set

for trial in April of 2019. There are three cases pending in Hillsborough County, Florida before Judge Rex Barbas. There is one case pending in Osceola County, Florida before Judge Margaret Schreiber. There are two cases pending in Palm Beach County, Florida (one case before Judge Jaime Goodman and one case before Meenu Sasser). There is one case pending in Volusia County, Florida. There are two cases in Orange County, Florida before Judge Jose R. Rodriguez. There is one case pending in Sarasota County before Judge Andrea McHugh.

In the *Ricketts* matter, pending in Broward County, Imerys' Motion to Dismiss for Lack of Personal Jurisdiction was denied on November 9, with the Court granting 30 days for Imerys to file an appeal. That appeal was filed on December 8, 2017.

Georgia: There are eight cases pending in Georgia state court. One case in Fulton County, Georgia before Judge Jane Morrison is currently set for trial in March of 2019 but, due to the court's schedule, is to be reset to a date yet to be determined. There are six cases pending in Gwinnet County, Georgia before Judge Shawn F. Bratton. There is one case pending in Richmond County before Judge Patricia W. Booker.

Illinois: There are twenty-three cases pending in Illinois state court. There are two cases in Madison County, Illinois state court before Judge William Mudge. There are eighteen cases pending in Cook County, Illinois, which have been consolidated in the *Harris* matter before Judge Daniel T. Gillespie. There is one additional case pending in Cook County, Illinois before Judge Brendan A. O'Brien. There is one case pending in McLean County, Illinois before Judge Rebecca Foley. There is one case pending in St. Clair County before Judge Christopher T. Kolker

Pennsylvania: There is one case pending in state court in Allegheny County, PA before Judge Robert Colville. Imerys' appeal on personal jurisdiction issues is pending. There are six cases pending in state court in Philadelphia County, PA (three cases before Judge John M. Younge, two cases before Judge Idee Fox, and one case before Judge Arnold New).

Louisiana: There are seventeen cases pending in Louisiana State Court. There are twelve in the Parish of Orleans, Louisiana, including two cases before Judge Robin M. Giarrusso, two cases before Judge Melvin Zeno, one case before Judge Paulette Irons, three cases before Judge Kern Reese, one case before Judge Piper Griffin, one case before Judge Donald Johnson, one case before Judge Christopher Bruno, and one case before Judge Rachael Johnson. There are five cases pending in East Baton Rouge Parish, one before Judge Janice Clark, one before

Judge Donald Johnson, one before Judge Todd Hernandez, and one before Judge R. Michael Caldwell, and one before Judge Wilson Fields.

In the *McBride* matter, Imerys' Motion to Dismiss for Lack of Personal Jurisdiction was granted on December 1, 2017. On January 3, 2018, the Court denied the Plaintiff's motion for a new trial on this ruling. In the *Rose Bowie* case, the Johnson and Johnson Defendants and Imerys have filed several motions, which are due to be heard on May 18, 2018, along with a motion for an expedited trial setting.

Arizona: There is one case pending in Pima County, Arizona before Judge Douglas Metcalf.

VIII. STATUS OF PENDING MOTIONS

- A. The list of motions pending in individual cases is attached hereto as Exhibit A.
- B. On July 14, 2017, the Court issued a dismissal of the *Estrada* Consumer Class case, finding that Estrada did not allege an injury in fact. ECF Nos. 50, 51. The Court dismissed and entered judgment in Estrada's lawsuit on August 10, 2017. ECF No. 53. Estrada has appealed this decision. On September 6, 2018, a panel of the Third Circuit Court of Appeals affirmed the Court's decision. Estrada filed a petition for rehearing *en banc* on September 20, 2018, which was denied on October 3, 2018.

Respectfully submitted,

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EXHIBIT A**STATUS OF PENDING MOTIONS IN INDIVIDUAL CASES**

Case Name	Case No.	Status of Pending Motions
<i>Ellen Gavin v. Johnson & Johnson, et al.</i>	3:17-cv-05907	Plaintiffs' Motion to Remand filed August 10, 2017. Fully briefed. Imerys' Motion to Dismiss filed 9/8/17. Fully briefed 10/10/17.
<i>Edna Brown v. Johnson & Johnson, et al.</i>	3:17-cv-05724	Plaintiffs' Motion to Remand filed September 1, 2017. Fully briefed. Imerys' Motion to Dismiss filed 9/5/17. Fully briefed.
<i>Carolyn Bennett v. Johnson & Johnson, et al.</i>	3:17-cv-05723	Plaintiffs' Motion to Remand filed September 1, 2017. Fully briefed. Imerys' Motion to Dismiss filed 9/5/17. Fully briefed.
<i>Maureen Abbeduto, et al. v. Johnson & Johnson, et al.</i>	3:17-cv-05812	Plaintiffs' Motion to Remand filed September 1, 2017. Fully briefed. Imerys' Motion to Dismiss filed 9/5/17. Fully briefed.
<i>Kim Knight v. Johnson & Johnson, et al.</i>	3:17-cv-05796	Plaintiffs' Motion to Remand filed September 1, 2017. Fully briefed. Imerys' Motion to Dismiss filed 9/5/17. Fully briefed.
<i>Sharon McBee, et al. v. Johnson & Johnson, et al.</i>	3:17-cv-5720	Johnson & Johnson Defendants' Motion to Dismiss filed September 5, 2017. Motion to be terminated pursuant to CMO 8. Imerys' Motion to Dismiss filed 9/5/17. Fully briefed 10/13/17. Motion to be terminated pursuant to CMO 8.
<i>Donna McNichols, et al. v. Johnson & Johnson, et al.</i>	3:17-cv-5719	Johnson & Johnson Defendants' Motion to Dismiss filed September 5, 2017. Motion to be terminated pursuant to CMO 8. Imerys' Motion to Dismiss filed 9/5/17. Fully briefed 10/13/17. Motion to be terminated pursuant to CMO 8.

Case Name	Case No.	Status of Pending Motions
<i>Sandra Lee, et al. v. Johnson & Johnson, et al.</i>	3:17-cv-03548	<p>Plaintiffs' Motion to Remand filed September 25, 2017. Johnson & Johnson Defendants' Opposition filed October 24, 2017. Defendant Imerys' Opposition filed October 25, 2017.</p> <p>Johnson & Johnson Defendants' Motion to Dismiss filed 10/24/2017. Plaintiffs' Opposition filed November 8, 2017.</p> <p>Imerys' Motion to Dismiss filed 10/9/17. Fully briefed.</p>
<i>Ruth Carver v. Johnson & Johnson, et al.</i>	3:17-cv-03549	<p>Plaintiffs' Motion to Remand filed September 25, 2017. Johnson & Johnson Defendants' Opposition filed October 24, 2017. Defendant Imerys' Opposition filed October 25, 2017.</p> <p>Johnson & Johnson Defendants' Motion to Dismiss filed 10/24/2017. Plaintiffs' Opposition filed November 8, 2017.</p> <p>Imerys' Motion to Dismiss filed 10/9/17. Fully briefed.</p>
<i>Rebecca Bowers v. Johnson & Johnson, et al.</i>	3:17-cv-12308	Plaintiffs' Motion to Remand filed December 4, 2017. Fully briefed.
<i>Peck, et al. v. Johnson & Johnson, et al.</i>	3:17-cv-12665	<p>Plaintiffs' Motion to Remand filed January 11, 2018. Johnson & Johnson Defendants' Opposition filed January 22, 2018. Defendant Imerys' Opposition filed February 7, 2018.</p> <p>Imerys' Motion to Dismiss filed November 8, 2017. Fully briefed.</p>
<i>Anderson, et al. v. Johnson & Johnson, et al.</i>	3:17-cv-2943	Plaintiff's Motion for Voluntary Dismissal without prejudice filed February 15, 2018. Fully briefed. 2018.
<i>Chathapana, Davahn v. Johnson & Johnson, et al.</i>	3:17-cv-05853	Imerys' Motion to Dismiss filed 9/5/17. No opposition filed. Motion to be terminated pursuant to CMO 8.

Case Name	Case No.	Status of Pending Motions
<i>Femminella, Joan v. Johnson & Johnson, et al.</i>	3:17-cv-05860	Imerys' Motion to Dismiss filed 9/5/17. No opposition filed. Motion to be terminated pursuant to CMO 8.
<i>Glenn, Karen v. Johnson & Johnson, et al.</i>	3:17-cv-05071	Imerys' Motion to Dismiss filed 8/21/17. No opposition filed. Motion to be terminated pursuant to CMO 8.
<i>Guptill, Mary v. Johnson & Johnson, et al.</i>	3:17-cv-05869	Imerys' Motion to Dismiss filed 9/5/17. No opposition filed. Motion to be terminated pursuant to CMO 8.
<i>Dawn Hannah v. Johnson & Johnson, et al.</i>	3:18-cv-01422	Plaintiff's Motion to Remand filed March 5, 2018. Fully Briefed. Imerys' Motion to Dismiss filed 4/4/18. Fully briefed.
<i>Callahan, Janice v. Johnson & Johnson, et al.</i>	3:18-cv-05557	Plaintiff's Motion to Remand filed May 4, 2018. Fully briefed. Defendant Imerys' Motion to Dismiss filed October 10, 2018. Fully Briefed.
<i>Smith, Phyllis v. Johnson & Johnson, et al.</i>	3:18-cv-05556	Plaintiff's Motion to Remand filed May 4, 2018. Fully briefed. Defendant Imerys' Motion to Dismiss filed October 9, 2018. Fully Briefed.
<i>Baker v. Johnson & Johnson, et al.</i>	3:17-cv-07712	Plaintiff's Motion to Remand filed June 8, 2018. Fully briefed. Defendant Imerys' Motion to Dismiss filed July 9, 2018. No oppositions were filed. Plaintiffs' Motion to Stay or Strike Defendant Imerys' Motion to Dismiss filed July 17, 2018. Defendant Imerys' Opposition filed July 27, 2017.
<i>Cartwright, Darren v. Johnson & Johnson, et al.</i>	3:18-cv-05535	Plaintiffs' Motion to Remand filed July 25, 2018. Fully briefed. Defendant Imerys' Motion to Dismiss filed August 24, 2018. Fully Briefed.

Case Name	Case No.	Status of Pending Motions
<i>Kassimali, Maureen, et al. v. Johnson & Johnson, et al.</i>	3:18-cv-05534	Plaintiffs' Motion to Remand filed July 25, 2018. Fully briefed. Defendant Imerys' Motion to Dismiss filed August 24, 2018. Fully Briefed.
<i>Kehoe, Tracey, et al. v. Johnson & Johnson, et al.</i>	3:18-cv-11509	Plaintiffs' Motion to Remand filed July 26, 2018. Defendants' Opposition filed August 27, 2018. Plaintiffs' Reply to Johnson & Johnson Defendants' filed October 8, 2018. Defendant Imerys' Motion to Dismiss filed October 23, 2018. Fully Briefed.
<i>Storm, Cathy v. Johnson & Johnson, et al.</i>	3:18-cv-10321	Plaintiff's Motion to Remand filed July 3, 2018. Johnson & Johnson Defendants' Opposition filed August 2, 2018. Defendant Imerys' Opposition filed August 3, 2018. Defendant Imerys' Motion to Dismiss filed October 11, 2018. Fully brief.
<i>Jiminez, Sandra, et al. v. Johnson & Johnson, et al.</i>	3:18-cv-12526	Plaintiffs' Motion to Remand filed August 23, 2018. Fully briefed.
<i>Johnson, Amy v. Johnson & Johnson, et al.</i>	3:18-cv-01423	Plaintiffs' Motion to Remand filed September 26, 2018. Fully Briefed. Imerys' Motion to Dismiss filed October 26, 2018. Fully Briefed.
<i>Gavin, Sherron, et al. v. Johnson & Johnson, et al.</i>	3:18-cv-10319	Plaintiffs' Motion to Remand filed September 26, 2018. Fully Briefed. Imerys' Motion to Dismiss filed October 26, 2018. Fully Briefed.
<i>Reising, Amanda, et al. v. Johnson & Johnson, et al.</i>	3:18-cv-10320	Plaintiffs' Motion to Remand filed September 26, 2018. Fully Briefed. Imerys' Motion to Dismiss filed October 26, 2018. Fully Briefed.
<i>Farra, Donna v. Johnson & Johnson, et al.</i>	3:18-cv-13432	Plaintiffs' Motion to Remand filed September 28, 2018. Fully Briefed. Imerys' Motion to Dismiss filed October 29, 2018. Fully Briefed.

Case Name	Case No.	Status of Pending Motions
<i>Gendelman, Robert v. Johnson & Johnson, et al.</i>	3:17-cv-00461	On 11/14/18, Defendant Imerys and Plaintiff submitted joint letter to Judge Wolfson withdrawing Motion to Remand and Motion to Dismiss without prejudice.
<i>Aikens, Chelsea v. Johnson & Johnson, et al.</i>	3:17-cv-12675	Motion to Remand (consolidated under Motion to Remand filed in the Sandra Peck matter filed January 11, 2018. Defendant Johnson & Johnson's Opposition filed January 22, 2018. Imerys' Opposition filed February 7, 2018. Imerys' Motion to Dismiss filed November 14, 2018. Fully Briefed.
<i>Comardelle, Pamela v. Johnson & Johnson, et al.</i>	3:17-cv-13365	Motion to Remand (consolidated under Motion to Remand filed in the Sandra Peck matter filed January 11, 2018. Defendant Johnson & Johnson's Opposition filed January 22, 2018. Imerys' Opposition filed February 7, 2018. Imerys' Motion to Dismiss filed November 12, 2018. Fully Briefed.
<i>Gibson, Cynthia v. Johnson & Johnson, et al.</i>	3:18-cv-14637	Plaintiffs' Motion to Remand filed November 1, 2018. Fully Briefed. Imerys' Motion to Dismiss filed December 3, 2018. Plaintiffs' Opposition filed January 2, 2019. Imerys' Reply Brief due January 17, 2019.
<i>Lightfoot, Brandy v. Johnson & Johnson, et al.</i>	3:17-cv-13361	Motion to Remand (consolidated under Motion to Remand filed in the Sandra Peck matter filed January 11, 2018. Defendant Johnson & Johnson's Opposition filed January 22, 2018. Imerys' Opposition filed February 7, 2018. Imerys' Motion to Dismiss filed November 13, 2018. Fully Briefed.

Case Name	Case No.	Status of Pending Motions
<i>Mouton, Geneva v. Johnson & Johnson, et al.</i>	3:17-cv-12674	Motion to Remand (consolidated under Motion to Remand filed in the Sandra Peck matter filed January 11, 2018. Defendant Johnson & Johnson's Opposition filed January 22, 2018. Imerys' Opposition filed February 7, 2018. Imerys' Motion to Dismiss filed November 13, 2018. Fully Briefed.
<i>Sansome, Kristina v. Johnson & Johnson, et al.</i>	3:17-cv-12673	Motion to Remand (consolidated under Motion to Remand filed in the Sandra Peck matter) filed January 11, 2018. Defendant Johnson & Johnson's Opposition filed January 22, 2018. Imerys' Opposition filed February 7, 2018. Imerys' Motion to Dismiss filed November 15, 2018. Fully Briefed.
<i>Hittler, Lisa v. Johnson & Johnson, et al.</i>	3:18-cv-17106	Motion to Remand filed January 7, 2019. Oppositions due on February 6, 2019.
<i>Barsh, Eleanor v. Johnson & Johnson, et al.</i>	3:18-cv-01464	Renewed Motion to Remand filed January 9, 2019. Oppositions due February 6, 2019.