

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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

Civil No. 19-2875 (RBK/JS)

This Document Relates to:

All Actions

**STIPULATED ORDER EFFECTUATING AGREEMENT REGARDING
ESI SEARCH TERMS PERTAINING TO THE AUROBINDO DEFENDANTS**

THIS MATTER HAVING COME before the Court on Defendants' Motion to Modify the ESI Search Terms (Dkt. 445); and

THIS COURT HAVING CONSIDERED the parties' submissions in support of and in opposition to said Motion, as well as the argument and representations of counsel made during the telephonic status conference on June 17, 2020,

IT IS HEREBY ORDERED, this the 25th day of June 2020, as follows:

1) Based on affirmations from counsel that an agreement has been reached to resolve the parties' current dispute concerning ESI search terms, the Defendants' Motion to Modify the ESI Search Terms is **DENIED AS MOOT** with respect to Aurobindo Pharma Ltd., Aurolife Pharma LLC, and Aurobindo Pharma USA, Inc. (the "Aurobindo Parties");


2) For purposes of effectuating and memorializing the agreement reached between Plaintiffs and the Aurobindo Parties, and based on the agreement between Plaintiffs and the Aurobindo Parties, the Court **STATES FURTHER**:

a. The Aurobindo Parties will search their custodians' files using the search terms contained in, and in the manner described in, Exhibit H to the December 23, 2019 Order (Dkt. 328 at 29-57, the "December 23 Order"), except that they will

apply the agreed modifications to those search terms set forth in Exhibit 1 to this Stipulated Order and, should the need arise, the parties are permitted to make additional mutually agreed-to modifications without Court intervention and as long as such modifications do not result in a delay of document production; and

b. In addition to the above, the parties will proceed in accordance with the ESI Protocol (Dkt. 125), as well as their representations and the Court's instructions made during the June 17, 2020 status conference, to resolve issues through the meet and confer process, if any, that might arise during the processing, review, and production of the Aurobindo Parties' ESI.

SO ORDERED.



JOEL SCHNEIDER
United States Magistrate Judge

Term / Name	Agreed Modifications for The Aurobindo Parties
("PROCESS I" or "PROCESS II") AND (acid*)	Remove
("PROCESS I" or "PROCESS II") AND (amlodipine*)	Remove
("PROCESS I" or "PROCESS II") AND (aqueous*)	Remove
("PROCESS I" or "PROCESS II") AND (HCT or HCTZ)	Remove
("PROCESS I" or "PROCESS II") AND (hydrochlor*)	Remove
(ANDA) AND (amlodipine*)	Remove
(ANDA) AND (HCT or HCTZ)	Remove
(ANDA) AND (hydrochlor*)	Remove
(distribut*) AND (acid*)	Remove
(distribut*) AND (amlodipine*)	Remove
(distribut*) AND (HCT or HCTZ)	Remove
(distribut*) AND (hydrochlor*)	Remove
(delet* or destroy* or remov* or trash* or shred*) AND (Agency)	Remove
(delet* or destroy* or remov* or trash* or shred*) AND (blood*)	Remove
(delet* or destroy* or remov* or trash* or shred*) AND (HCTZ)	Remove
(delet* or destroy* or remov* or trash* or shred*) AND (hyrdochloro*)	Remove
(Patel) AND ("Abbreviated New Drug Application" or ANDA)	Remove

(Patel) AND ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park")	Remove
(Patel) AND (CDER or "Center for Drug Evaluation and Research")	Remove
(Patel) AND (DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency")	Remove
(quality) AND (test*)	Change to quality w/10 test*
(investigat*) AND ("Abbreviated New Drug Application" or ANDA)	Change to (investigator* or investigation*)
(investigat*) AND ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park")	Change to (investigator* or investigation*)
(delet* or destroy* or remov* or trash* or shred*) AND (regulat*)	Change to (delet* or destroy* or remov* or trash* or shred*) w/300 (regulat*)
(delet* or destroy* or remov* or trash* or shred*) AND (test*)	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 (test*)
(delet* or destroy* or remov* or trash* or shred*) AND (CDER or "Center for Drug Evaluation and Research")	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 (CDER or "Center for Drug Evaluation and Research")
(delet* or destroy* or remov* or trash* or shred*) AND (DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency")	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 (DEA or "Drug Enforcement Administration" or "Drug Enforcement Agency")
(delet* or destroy* or remov* or trash* or shred*) AND ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park")	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 ("Food and Drug Administration" or FDA or USFDA or "US-FDA" or "College Park")
(delet* or destroy* or remov* or trash* or shred*) AND ("Abbreviated New Drug Application" or ANDA)	Change to (delet* or destroy* or remov* or trash* or shred*) w/500 ("Abbreviated New Drug Application" or ANDA)