

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

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**SHERYL MCCALL and DAVID  
MCCALL,**

*Plaintiffs,*

v.

**JANSSEN PHARMACEUTICALS, INC.,  
et al.,**

*Defendants.*

*This Document Relates to All Cases<sup>1</sup>*

: Case Nos.  
: 3:20-cv-08074; 3:20-cv-12605;  
: 3:20-cv-07758; 3:20-cv-07756;  
: 3:20-cv-09530; 3:20-cv-10080;  
: 3:20-cv-07753; 3:20-cv-12328;  
: 3:20-cv-11913; 3:20-cv-11912;  
: 3:20-cv-12608; 3:20-cv-07079;  
: 3:20-cv-10341; 3:20-cv-11921;  
: 3:20-cv-12421; 3:20-cv-13940;  
: 3:20-cv-10342; 3:20-cv-07750;  
: 3:20-cv-12547; 3:20-cv-10966;  
: 3:20-cv-11919; 3:20-cv-10968;  
: 3:20-cv-12264; 3:20-cv-13596;  
: 3:20-cv-06070; 3:20-cv-10960

**JUDGE BRIAN R. MARTINOTTI  
JUDGE ZAHID N. QURAIISHI**

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<sup>1</sup> The served cases are: (1) *Rebecca Anthony and Carlie Anthony v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-12605-BRM-ZNQ; (2) *Lynn Brewer and William Brewer v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-07758-BRM-ZNQ; (3) *Harriet Comstock v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-07756-BRM-ZNQ; (4) *Sherry Dobbins and James Dobbins v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-09530-BRM-ZNQ; (5) *Carol Dubois v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-10080-BRM-ZNQ; (6) *Deborah Edwards v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-07753-BRM-ZNQ; (7) *Margaret Emmons v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-12328-BRM-ZNQ; (8) *Marilyn J. Evans v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-11913-BRM-ZNQ; (9) *Iris Groudan v. Janssen Pharmaceuticals Inc., et al.*, 3:20-cv-11912-BRM-ZNQ; (10) *Carol Hardy and Roger Hardy v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-12608-BRM-ZNQ; (11) *Valerie Hull and Edward Hull v. Teva Pharmaceuticals, Inc., et al.*, 3:20-cv-07079-BRM-ZNQ; (12) *Clara Johns v. ALZA Corp., et al.*, 3:20-cv-10341-BRM-ZNQ; (13) *Tiffany Kotz v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-11921-BRM-ZNQ (14) *Elizabeth Lafave v. Teva Branded Pharmaceutical Products R&D, Inc., et al.*, 3:20-cv-12421-BRM-ZNQ; (15) *Velma Lehmann v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-13940-BRM-ZNQ; (16) *Shirley Ruth Levy v. ALZA Corp., et al.*, 3:20-cv-10342-BRM-ZNQ; (17) *Barbara Mayou and Keith Mayou v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-07750-BRM-ZNQ; (18) *Sheryl McCall and David McCall v. Janssen Pharmaceuticals, Inc., et al.*, 3:20-cv-08074-BRM-ZNQ; (19) *Loretta Reid v. Janssen*

- (13) Structural files not material to individual file contents (e.g. .CSS, .XSL, .DTD,) unless such files contain substantive data (for example when used for data storage or transmission);
  - (14) Operating System files that do not store substantive content (e.g. CAT, DLL, DMP, EXE, FON, PNF, OPS, SYS.);
  - (15) Application source code, configuration, and other similar files necessary for the function of an application that do not store user-created content during ordinary use (E.g. BAK, BIN, CFG, DBF, DAT, JS, JAR, LUA, MSB, RES, WINNT, YTR), and are not user-created programs (for example SAS programs).
- f. Disaster-Recovery Backup Data. Absent a Party's specific written notice for good cause, no Party shall be required to modify or suspend procedures, including rotation of backup Media, used in the normal course of business to back up data and systems for disaster recovery purposes. Absent a showing of good cause, such backup Media shall be considered to be not reasonably accessible. Notwithstanding anything contained herein to the contrary, before any non-duplicative, discoverable data that Defendants have a reasonable and good faith belief would potentially contain responsive information is erased, overwritten, destroyed or otherwise made unavailable or unusable, the Defendants will identify in sufficient detail what potentially relevant data is on such Media and which is no longer available on other systems or other Media.
3. Procedures for redactions and for the handling of materials subject to claims of attorney-client privilege, work-product, and privacy shall be set out in the Protective Order to be entered in this action.