

Documents

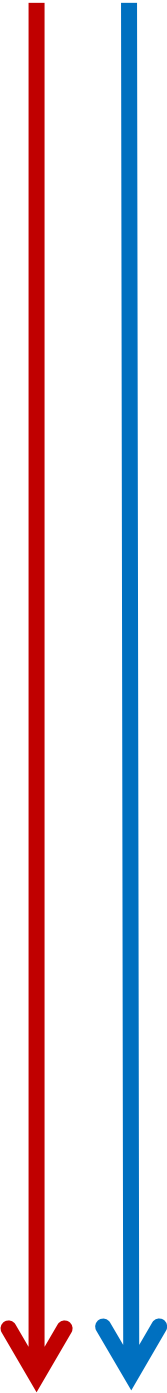
All pharmacy records relating to dispensing drugs to the plaintiff for two (2) years before the date of the first diagnosis of the alleged personal injury, through two (2) years after the plaintiff stopped taking the Olmesartan products, OR , for two (2) years after the alleged personal injury (the digestive issues), <i>whichever date occurs last</i> .
A Plaintiff Fact Sheet (PFS) and authorizations for the release of records. All plaintiffs, even those who previously submitted a PFS, must file updated authorizations.
Medical records for two (2) years before the date of the first diagnosis of the alleged personal injury, through two (2) years after the plaintiff stopped taking the Olmesartan products, OR , for two (2) years after the alleged personal injury (the digestive issues), <i>whichever date occurs last</i> . The medical records include: All physicians, medical facilities, other healthcare providers and/or other providers who prescribed the plaintiff Olmesartan products, or gave the plaintiff samples of Olmesartan products. All medical records relating to the plaintiff from the plaintiff’s primary care physician(s). All medical records relating to the plaintiff from the plaintiff’s gastroenterologist. All medical records relating to the plaintiff from any other healthcare provider who treated the plaintiff for the personal injuries alleged in the plaintiff’s case. All medical records relating to the plaintiff from any hospital that treated the plaintiff for the alleged personal injury.
A certification signed by the plaintiff or the plaintiff’s lawyer stating that the following records have been collected and submitted per CMO34: All of the pharmacy records above; All of the medical records above. Note: If any of the above documents don’t exist or can’t be collected/submitted, the plaintiff or the plaintiff’s lawyer shall state that fact and the reason, if known, that the documents don’t exist or can’t be collected/submitted. This statement will be made as part of the certification, and must include a “No Records Statement” from the pharmacy or the healthcare provider .

Deadline for Filing

For cases filed or transferred before August 1, 2017: currently 11:59pm on November 15, 2017. This is based on CMO34 and is sixty (60) days from the final Opt-In Deadline for the Olmesartan Products Resolution Program, which is currently 11:59pm on September 15, 2017.

For cases filed or transferred on or after August 1, 2017: within sixty (60) days from the date the case was filed or transferred. See Note on "counting the days."

Chart courtesy of LegalReader.com

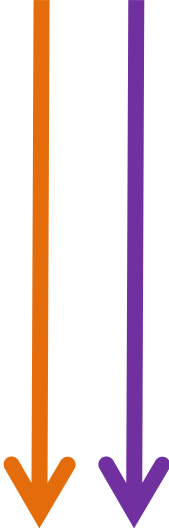


Documents

A report that complies with Federal Rule of Civil Procedure 26(a)(2) on general causation. For general causation, this report must be from a medical expert expressing the opinion (to a degree of medical or scientific certainty) that Olmesartan products pose an increased risk for the development of the type of injury alleged by the plaintiff.

A report that complies with Federal Rule of Civil Procedure 26(a)(2) on specific causation. For specific causation, this report must be from a medical expert expressing the opinion (to a reasonable degree of medical certainty) that using Olmesartan products caused or substantially contributed to the plaintiff’s alleged injury.

Note: Plaintiffs should consult their lawyers regarding the reports mentioned in the two boxes above to ensure that the reports comply with the Rule’s requirements.



Deadline for Filing

For cases filed or transferred before August 1, 2017: currently 11:59pm on January 14, 2018. This is due to the fact that the actual deadline is on Sunday, January 13, 2018. This is based on CMO34 and is one hundred twenty (120) days from the final Opt-In Deadline.

For cases filed or transferred on or after August 1, 2017: one hundred twenty (120) days from the date the case was filed or transferred. Please refer to the Note on "counting the days."

Chart courtesy of LegalReader.com

Note on "counting the days": Federal Rules of Civil Procedure #6 dictates how to “count the days.” In this case, do not include the date the case was filed or transferred; start with the following day. Include: Saturdays, Sundays, and legal holidays, as well as the last day of the period (the sixtieth day) unless the last day is on a Saturday, Sunday, or legal holiday. In that case, the end of the period is the next day that is not a Saturday, Sunday, or legal holiday. Example: Sixty days for a case filed or transferred on August 10, 2017 is October 10, 2017.