

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

IN RE NUVARING PRODUCTS	)	4:08MD1964 (RWS)
LIABILITY LITIGATION	)	ALL CASES

**STIPULATION**

Schering Corporation, Organon USA, Inc. and N.V. Organon hereby stipulate that they are among the current corporate entities named in personal injury actions involving NuvaRing that are the subject of this MDL, and that based upon corporate acquisitions and mergers, they are currently or have been in the past involved in the research and development, design and manufacture, pre-clinical and clinical studies and testing, regulatory approval, labeling, safety surveillance, marketing, promotion, sale and distribution of NuvaRing in the United States.

In cases already on file, there will be no need for additional service of process on Schering Corporation, Organon USA, Inc. or N.V. Organon. Each of these entities will be deemed to have been named as a defendant in all cases already filed and jurisdiction obtained over them as of the time any individual complaint was filed and served. No amended Complaints will need to be filed to effectuate this stipulation. In new cases that are filed after the date of this Stipulation, Schering Corporation, Organon USA, Inc., and N.V. Organon can be served by certified mail via registered agent The Corporation Trust Co, 820 Bear Tavern Road, 3d Floor, West Trenton, NJ 08628.

Schering Corporation, Organon USA, Inc. and N.V. Organon represent that they have possession and control of NuvaRing documents from their predecessors in interest and will respond to discovery reasonably and properly requested by Plaintiffs. Schering Corporation, Organon USA, Inc. and N.V. Organon agree to use their best efforts to produce currently employed witnesses for deposition as reasonably and properly requested by Plaintiffs regardless of which of the predecessor companies employed the witnesses.

Schering Corporation, Organon USA, Inc. and N.V. Organon agree that they will enter into the same stipulation in pending state court actions in New Jersey and in subsequently filed cases in New Jersey court involving NuvaRing that raise allegations and claims sufficiently similar to the current personal injury claims in this litigation. In so agreeing, Defendants do not waive their right to object to the filing of future cases based on *forum non conveniens* grounds or improper venue. Nothing herein shall be construed as a waiver by Defendants of the right to raise by motion or otherwise any substantive defense to the personal injury claims in the litigation.

Dated: May 3, 2011

**Respectfully submitted,**

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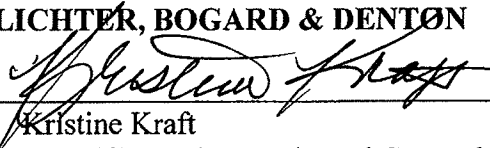
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**SCHLICHTER, BOGARD & DENTON**

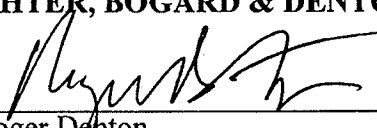
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