

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

JO ARONSTEIN, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

KENVUE, INC., a Delaware Corporation, and  
JOHNSON & JOHNSON, a New Jersey Corporation,  
JOHNSON & JOHNSON CONSUMER, INC., a New  
Jersey Corporation,

Defendants.

Civil Action No. 3:24-cv-04665

**ORDER**

MARY JANE CASTLE and BRANDI BALDWIN-  
JONES, individually and on behalf of herself and all  
others similarly situated,

*Plaintiffs,*

v.

JOHNSON & JOHNSON and KENVUE INC.,

*Defendants.*

Civil Action No. 3:24-cv-06090

SHARNAY MOULTRIE, individually and on behalf  
of all others similarly situated,

*Plaintiffs,*

v.

JOHNSON & JOHNSON and KENVUE INC.,

*Defendants.*

Civil Action No. 3:24-cv-04757

IT HAVING BEEN STIPULATED AND AGREED by Plaintiffs and Defendants in the above-captioned matters, through their respective counsel, as follows:

WHEREAS, all three of the above-captioned actions (the “Actions”) seek to represent a class of persons or entities who have purchased Defendants’ OURTONE and FLEX FABRIC Band-Aid products with substantially similar questions of fact and law, such that consolidation under Rule 42 of the Federal Rules of Civil Procedure and Local Rule 42.1 will serve the Court, the Parties, and the interests of justice by maximizing efficiency, minimizing redundancies, and eliminating the threat of inconsistent rulings;

NOW THEREFORE, the Parties through their respective counsel and subject to the Court’s approval hereby stipulate and agree that:

1. Pursuant to Fed. R. Civ. P. 42(a), the above-captioned Actions, Civil Action Nos. 3:24-cv-04665, 3 :24-cv-06090, 3 :24-cv-04757, are hereby consolidated for all purposes.
2. The Clerk shall establish a Docket for the Actions under Civil Action No. 3:24-cv-04665. All papers filed in the Actions shall be filed on the Docket and shall bear the caption:

JO ARONSTEIN, individually and on behalf of all others similarly situated,  
Plaintiffs,  
v.  
KENVUE, INC., a Delaware Corporation, and  
JOHNSON & JOHNSON, a New Jersey Corporation, JOHNSON & JOHNSON CONSUMER, INC., a New Jersey Corporation,  
Defendants.

Civil Action No.: 3:24-cv-04665

3. Any actions related to the Actions that are subsequently filed in or transferred to this District, or to be filed or transferred, **MAY** be consolidated **WITH THE CONSENT** of counsel from the subsequently-filed or transferred actions.

4. Should such consent be withheld, the Parties will meet and confer with counsel from the subsequently filed or transferred actions to explore ways to prevent redundancies, inefficiencies and/or the threat of inconsistent rulings from the subsequently-filed or transferred actions, before seeking relief from the Court.

5. Service shall be deemed complete once Defendants have been served with the complaint in one of the above-captioned Actions.

6. Defendants' time to answer, move, or otherwise respond to the complaints in the above-captioned Actions is suspended.

7. After the appointment of interim class counsel, Plaintiffs and Defendants shall meet and confer with respect to a schedule for Plaintiffs to file a consolidated complaint and for Defendants to answer, move, or otherwise respond to the consolidated complaint.

8. Except as to the defense of insufficiency of service of process and insufficiency of process in these Actions, no defense of the Defendants is prejudiced or waived by such Defendants' executing, agreeing to, or joining this Order, including but not limited to whether this case is appropriate for class treatment under Federal Rule of Civil Procedure Rule 23. Defendants agree that interim class counsel may serve a valuable administrative role at this phase of the case but Defendants specifically do not agree that the appointment of interim class counsel creates an attorney-client relationship between interim class counsel and absent putative class members prior to class certification.

SO ORDERED this 5<sup>th</sup> day of June, 2024

  
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HON. MICHAEL A. SHIPP, U.S.D.J.