

RICHARD J. WILLIAMS, JR.
CERTIFIED CIVIL TRIAL ATTORNEY
Direct dial: (973) 425-8773
rwilliams@ndinc-law.com

August 26, 2019

Via Federal Express

Honorable Glenn A. Grant, J.A.D.
Administrative Director of the New Jersey Courts
Administrative Office of the Courts of the State of New Jersey
Richard J. Hughes Justice Complex
25 W. Market Street
Trenton, NJ 08625

RE: HealthPlus Surgery Center Litigation

Dear Judge Grant:

This office represents HealthPlus Surgery Center, LLC in respect of numerous pending civil matters. Please accept this correspondence in response to the application for mass tort case management submitted by Alan Roth, Esq. in respect of these matters. Although HealthPlus denies all liability for the claims asserted by all of the plaintiffs who have filed suit, including four pending class actions, HealthPlus does not object to the request for case classification as Multicounty Litigation in respect of the individual tort claims filed by several individual plaintiffs. HealthPlus agrees that the most efficient procedure for managing this litigation is to centralize the case management of the actions pending in the New Jersey Superior Court.

As Mr. Roth noted in his correspondence, there are three class actions pending in Federal Court and a fourth class action that was remanded back to Essex County Superior Court. There are an additional 14 actions filed by individual tort plaintiffs pending in New Jersey Superior Court. We enclose a complete list of all of the actions filed against HealthPlus, of which we are presently aware.



Thank you for Your Honor's attention to this matter.

Respectfully submitted,

MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

Richard J. Williams, Jr.

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RJW

Enclosure

cc: Phillip C. Federico, Esq. (via email)

Michael J. Maggiano, Esq. (via email)

Michael J. Epstein, Esq. (via email)

Jared R. Cooper, Esq. (via email)

Brett Stambolian, Esq. (via email)

HealthPlus Surgery Center, LLC Litigation

Case Name	Class Action or Individual Claim	Venue & Docket/Civil Action No.
Individually and as a Class Rep v. HealthPlus Surgery Center, Yan Betty McCabe	Class Action	Bergen County; L-9289-18; Removed to DNJ 2:19-cv-00964-WJM-MF
Marrero & Julio C. Marrero v. Healthplus Surgery Center	Class Action	Bergen County; L-9265-18; Removed to DNJ 2:19-cv-00965-WJM-MF
Winsky-Dunk v. Healthplus Surgery Center	Class Action	US Eastern District of NY Civil Action No: 18-cv-07459; transferred to DNJ 2:19-cv-964-WJM
cedo vs. Healthplus Surgery Center	Class Action	Essex County; L-74-19; Removed to DNJ 2:19-cv-00962-WJM-MF; Remanded back to Essex C
rez v. Healthplus Surgery	Individual	Essex County; L-713-19
Farrey and Patricia Yarey v. HealthPlus Surgery Center	Individual	Bergen County; L-689-19
Weststone v. HealthPlus Surgery Center	Individual	Bergen County; L-691-19
Kinlock and Shantene Kinlock v. HealthPlus Surgery Center, LLC	Individual	Bergen County; L-268-19
o Encarnacion et als. v. HealthPlus Surgery Center, LLC	Individual (batch)	Bergen County; L-1535-19
la Alvarez et als. v. HealthPlus Surgery Center, LLC	Individual (batch)	Bergen County; L-1315-19
an LaBarbiera v. HealthPlus Surgery Center; Gerardo Araiza	Individual	Bergen County; L-1037-19
DeBenedictis v. HealthPlus Surgery Center, LLC	Individual	Bergen County; L-28-19
Shretian v. Han Hyekyung	Individual	Bergen County; L-1333-19
Rodriguez v. HealthPlus Surgery Center	Individual (batch)	Bergen County; L-2725-19
arris v. HealthPlus Surgery Center	Individual	Kings County Supreme -- NY Index No. 505979/2019
phael et als v. HealthPlus Surgery Center	Individual (batch)	Bergen County; L-5483-19
Antana Hernandez v. HealthPlus Surgery Center	Individual (batch)	Bergen County; L-5475-19
ssent et als v. HealthPlus Surgery Center	Individual (batch)	Bergen County; L-5470-19