

LOWENSTEIN SANDLER PC

Attorneys At Law
65 Livingston Avenue
Roseland, New Jersey 07068
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Attorneys for Defendant
LifeCell Corporation

IN RE: ALLODERM® LITIGATION

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY**

DOCKET NO. L__ -11 MT

CASE CODE 295

CIVIL ACTION

_____ ,

Plaintiff,

v.

LIFECCELL CORPORATION

Defendant.

**ANSWER AND DEFENSES TO SHORT
FORM COMPLAINT AND ADOPTION
BY REFERENCE**

JURY TRIAL DEMANDED

1. Pursuant to Case Management Order No. 1 entered in *In re: AlloDerm® Litigation*, Case Number 295 on October 18, 2011, the undersigned counsel for Defendant LifeCell Corporation (“LifeCell”) hereby submit this Answer and Defenses to Short Form Complaint in response to the Short Form Complaint of Plaintiff _____ (“Plaintiff’s Short Form Complaint”), and adopt and incorporate by reference all relevant portions of the Answer and Defenses to Master Long Form Complaint for *In re: AlloDerm® Litigation*, Case Number 295, and any and all amendments thereto.

2. LifeCell is without knowledge and information sufficient so as to form a response to the statements set forth in paragraph 2 of Plaintiff's Short Form Complaint.

3. Defendant denies the allegations set forth in paragraph 3 of Plaintiff's Short Form Complaint.

4. Defendant denies the allegations set forth in paragraph 4 of Plaintiff's Short Form Complaint.

5. The statements set forth in paragraph 5 of Plaintiff's Short Form Complaint are not factual allegations to which a denial or admission would be appropriate. LifeCell adopts and incorporates by reference its responses in the Answer and Defenses to Master Long Form Complaint to each of the corresponding Counts adopted in paragraph 5 of Plaintiff's Short Form Complaint, and each of the Defenses in the Answer and Defenses to Master Long Form Complaint.

WHEREFORE, defendant LifeCell Corporation demands judgment against Plaintiff including the following:

- (1) dismissal with prejudice of Plaintiff's Short Form Complaint;
- (2) costs and reasonable attorneys' fees; and
- (3) all other relief that the Court deems appropriate and proper.

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Dated: December __, 2011

David W. Field
Stephen R. Buckingham

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, defendants designate David W. Field and Stephen R. Buckingham as trial counsel.

JURY DEMAND

Defendant demands trial by jury as to all issues so triable.

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David W. Field
Stephen R. Buckingham

CERTIFICATIONS

I hereby certify pursuant to R. 4:5-1 that, to the best of my knowledge, the matter in controversy is the subject of numerous other actions assigned to the Honorable Jessica R. Mayer in the Superior Court of New Jersey, Law Division, Middlesex County, under Master Case No. 295. I further certify that I am not aware of other parties who should be joined in this action at the present time. I further certify that this pleading was filed and served in accordance with the applicable Rule.

Dated: December __, 2011

Stephen R. Buckingham

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer and Defenses to Short Form Complaint and Adoption by Reference has been served this same day by electronic mail to the following counsel for Plaintiffs at the following addresses:

Adrienne E. Walvoord, Esq. awalvoord@anapolschwartz.com

Lawrence R. Cohan, Esq. lcohan@anapolschwartz.com

Dated: December __, 2011

Stephen R. Buckingham