_____,	SUPERIOR COURT OF NEW JERSEY
	LAW DIVISION – ATLANTIC COUNTY
Plaintiff(s),	DOCKET NO. ATL-L-
	MASTER CASE NO. L-6341-10-CT
vs.	Civil Action
	Gynecare Litigation, Case No. 291
ETHICON, INC., ETHICON WOMEN'S HEALTH AND UROLOGY, a Division of Ethicon, Inc., GYNECARE, JOHNSON & JOHNSON, AND JOHN DOES 1-20,	**MASTER SHORT FORM COMPLAINT AND JURY DEMAND**
Defendants.	

Plaintiff(s), _____, complaining against the Defendants, say(s) as follows:

FIRST COUNT

1. Pursuant to Case Management Order No. 3, entered in In Re Pelvic Mesh/Gynecare Litigation, Master Case No. L-6341-10-CT, Case No. 291, the undersigned counsel hereby submit this Short Form Complaint and Jury demand against the defendants, and adopts and incorporates by reference the allegations in the Plaintiffs' Master Long Form Complaint, and any and all amendments thereto.

2. Plaintiff is a resident of the State of _____.

3. Plaintiff brings this action [Check the applicable designation]:

_____ On behalf of herself.

_____ As the representative of _____, who is a living person.

_____ As the Administrator, Administrator ad Prosequendum, or other representative of the Estate of _____ (hereinafter "Decedent"), who died on _____.

4. Additionally, _____, is/are the [Check the applicable designation]:

_____ Spouse

_____ Child/Children

_____ Other (Set forth) _____

of _____, is/are a resident(s) of the State of _____, and is/are hereby named as an additional plaintiff(s), and claims damages.

5. Plaintiff asserts that the following designated product(s) was/were implanted into _____, causing injuries and damages [Check the applicable designation(s)]:

_____ Prolene Mesh/Prolene Soft Mesh

_____ Gynemesh

_____ TVT

_____ TVT-O

_____ TVT-S

_____ TVT Exact

_____ TVT Abbrevo

_____ Prolift

_____ Prolift +M

_____ Gynecare Pelvic Mesh Product(s), specific product name(s) unknown at present.

_____ Non-Gynecare Pelvic Mesh Product(s), known as _____.

6. The product code(s) and lot number(s) are as follows (if known):

_____.

7. The aforesaid implantation of Pelvic Mesh Product(s) occurred on: _____ [List all dates of implantation], at _____, located in _____ [City], _____ [State].

8. Plaintiff(s) adopt and incorporate by reference the applicable Causes of Action asserted against the Defendants in the Master Long Form Complaint.

9. _____ has suffered/will continue to suffer pain, suffering, disability, impairment, loss of enjoyment of life, inability to engage in chosen and necessary activities, and/or economic damages, as a result of the implantation of the prior designated pelvic mesh product(s).

10. The additional designated plaintiff(s) has suffered/have suffered/will continue to suffer loss of care, comfort, consortium, guidance, support, wrongful death damages, survivorship damages, and/or other losses and damages as a result of the implantation of the prior designated pelvic mesh product(s).

WHEREFORE, Plaintiff(s) demand Judgment against the Defendants awarding compensatory damages, punitive damages, attorneys' fees, interest, costs of suit, and such further relief as the Court deems equitable and just.

SECOND COUNT [If applicable]

1. Plaintiffs re-allege and incorporate by reference each of the foregoing paragraphs as if set forth at length herein.

2. Plaintiff(s) assert(s) the following additional Causes of Action against Defendant(s) [set forth the applicable Defendant(s), cause(s) of action and, where required by the New Jersey Rules of Court, supply the supporting facts and allegations with specificity]:

3. _____ has suffered/will continue to suffer pain, suffering, disability, impairment, loss of enjoyment of life, inability to engage in chosen and necessary activities, and/or economic damages, as a result of the implantation of the prior designated pelvic mesh product(s).

4. The additional designated plaintiff(s) has suffered/have suffered/will continue to suffer loss of care, comfort, consortium, guidance, support, wrongful death damages, survivorship damages, and/or other losses and damages as a result of the implantation of the prior designated pelvic mesh product(s).

WHEREFORE, Plaintiff(s) demand Judgment against the Defendants awarding compensatory damages, punitive damages, attorneys' fees, interest, costs of suit, and such further relief as the Court deems equitable and just.

THIRD COUNT

1. Plaintiffs re-allege and incorporate by reference each of the foregoing paragraphs as if set forth at length herein.

2. Defendants John Does 1-20 are persons, individuals, and/or entities who are liable and/or responsible for Plaintiff's/Plaintiffs' damages, but who have not been identified.

WHEREFORE, Plaintiff(s) demand Judgment against the defendants awarding compensatory damages, punitive damages, attorneys' fees, interest, costs of suit, and such further relief as the Court deems equitable and just.

JURY DEMAND

Plaintiff(s) hereby demand(s) a trial by jury.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, _____ is hereby designated as trial counsel.

_____
Attorney for Plaintiff(s)

RULE 4:5-1 CERTIFICATION

I hereby certify that to the best of my knowledge the matter in controversy is the subject of numerous other actions filed in the Superior Court, all of which are consolidated and designated as and under Master Docket No. L-6341-10-CT, Case No. 291, and that no other parties are necessary to join at this time.

I hereby certify that the foregoing statements made by me are true. I am aware if any of the foregoing statements made by me are willfully false, I am subject to punishment.

_____
Attorney for Plaintiff(s)