

FILED

AUG 31 2018

**RACHELLE L. HARZ
J.S.C.**

IN RE: : SUPERIOR COURT OF NEW JERSEY
: LAW DIVISION: BERGEN COUNTY
MIRENA IUD PRODUCTS LIABILITY LITIGATION :
: CASE NO. 297
This Document Relates to All Actions : CIVIL ACTION

CASE MANAGEMENT ORDER NO. 56

Dismissal of Claims for Failure to Appear and Participate in the Litigation

The Parties have advised the Court that they have entered into a Confidential Master Settlement Agreement ("MSA"). Although the terms of the settlement are confidential, the MSA seeks to include all plaintiffs, including derivative claimants, who have asserted claims against one or more of the following Defendants: Bayer HealthCare Pharmaceuticals Inc., Bayer Oy and Bayer Pharma AG ("Bayer Defendants"), including those claims asserted in *In Re: Mirena Litigation*, Multi-County Litigation Case No. 297 pending in the Bergen County Law Division of the Superior Court of New Jersey ("MCL"). The deadline to participate in the MSA expired on June 29, 2018. Subsequently, this Court has been advised that various individual counsel for Plaintiffs have advised Co-Lead Counsel for the Plaintiffs that approximately a few hundred Plaintiffs have failed to respond to their individual counsel regarding whether or not they intended to participate in the MSA. This Court has also been advised that an additional significant number of other Plaintiffs have not participated in the Confidential Master Settlement Agreement, but Co-Lead Counsel for the Plaintiffs do not know and cannot determine

whether these Plaintiffs are non-responsive to their individual counsel or if they do not intend to participate in the MSA.

While the terms of the MSA do not require a Plaintiff who wishes to reject her/his settlement offer to affirmatively opt-out of the settlement, this court recognizes that individual counsel for hundreds of Plaintiffs have advised Co-Lead Counsel that their clients have failed to respond regarding their intent to participate in the MSA and that an additional significant number of Plaintiffs may also be failing to respond to their individual counsel regarding their intent to participate in the MSA. In turn, this Court finds that it is in the best interest of the Parties and this Court's resources, before continuing with this MCL, to determine the intentions of these two groups of Plaintiffs who have not expressed their intent with regards to participation in the MSA.

This Case Management Order No. 56 mandates the procedure by which these two groups of Plaintiffs (hereinafter referred to as "Non-Responsive Plaintiffs" and identified by way of the spreadsheet attached to this CMO as Exhibit "A") must declare their intentions with respect to participating in the MSA, and if they chose not to participate in the MSA, whether they intend to continue to litigate their claims in this MCL. In addition, this Case Management Order sets forth the conditions under which the Court will dismiss the cases of those Non-Responsive Plaintiffs who fail to respond to this Order:

1. The Bayer Defendants and Plaintiffs' Co-Lead Counsel have advised the Court that each plaintiff listed on Exhibit A to this CMO is a Non-Responsive Plaintiff.
2. Within seven (7) days of entry of this CMO, counsel of record for each Non-Responsive Plaintiff shall send a letter to that plaintiff's last known address

advising plaintiff of: (a) the obligations set forth in paragraphs 3 and 4 below; and that (b) the failure to comply with those obligations will result in the dismissal of their claims with prejudice. Counsel shall send this letter to the Non-Responsive Plaintiff by regular and certified mail, return receipt requested, and shall be prepared to share it with the Court *in camera*. For *pro se* plaintiffs, Co-Lead counsel for Plaintiffs shall be responsible for mailing such letters to addresses available via Court filings, if applicable.

3. To promote the efficient resolution of this litigation, within thirty (30) days of entry of this CMO, each Non-Responsive Plaintiff must file and serve a completed Notice of Intent to Proceed (in a form substantially similar to that attached as Exhibit B to this CMO) and must also email the completed Notice of Intent to Proceed form to Mirena_Release@shb.com and mirena@motleyrice.com. The Notice of Intent to Proceed must be signed by the individual plaintiff and shall unambiguously identify which position the Non-Responsive Plaintiff is taking with respect to the MSA.
4. In addition to filing and serving a Notice of Intent to Proceed form, each Non-Responsive Plaintiff must also submit documents in accordance with the subparagraph below that reflects their MSA participation decision:
 - a. If the individual plaintiff intends to participate in the MSA she/he must, in addition to filing and serving a Notice of Intent to Proceed form, submit a signed and notarized Release (Exhibit C to this CMO) with a signed Stipulation of Dismissal (Exhibit D to this CMO) to the settlement's enrollment email addresses of Mirena_Release@shb.com and mirena@motleyrice.com within thirty (30) days of this CMO. In addition, she/he must also submit a Claim Form (attached hereto as Exhibit "E" to each individual firm's ShareFile Account) also within thirty (30) days of this CMO.
 - b. If the Non-Responsive Plaintiff does not intend to participate in the MSA but has given their counsel permission to execute a Stipulation for Dismissal with prejudice on their behalf, she/he must, in addition to filing and serving a Notice of Intent to Proceed form, must submit a

signed Stipulation of Dismissal (Exhibit D to this CMO) to the email addresses of Mirena_Release@shb.com and mirena@motleyrice.com within thirty (30) days of this CMO.

c. If the Non-Responsive Plaintiff does not intend to participate in the MSA but wishes to pursue her/his claim in Court, she/he must file and serve a Notice of Intent to Proceed form and must also email the Notice of Intent to Proceed Form to Mirena_Release@shb.com and mirena@motleyrice.com within thirty (30) days of this CMO.

5. Thirty-five (35) days from the issuance of this Order, the Parties shall jointly submit a list of Non-Responsive Plaintiffs that have not filed and served a Notice of Intent to Proceed pursuant to Paragraph 3 herein. Unless counsel for any of the identified Plaintiffs on this list or, alternatively, any of the Plaintiffs themselves, appears in Judge Harz's Courtroom on October 9, 2018 at 11:00 a.m. EST and shows cause why the Court should not issue an Order for Dismissal with Prejudice, the Court will consider such Non-Responsive Plaintiffs who fail to appear to have abandoned her/his case and will dismiss with prejudice, the Non-Responsive Plaintiffs' Claims at that time.

DATED:

8/31/2018

Rachelle L Harz
The Honorable Rachelle L. Harz, J.S.C.

EXHIBIT A

User/Last Name	User/First Name	Case Name	Original Court	Current Court	Current Cause #	Exhibit A	Firm
Adams-Venema	Joyce	Adams-Venema, Joyce	NJ - Bergen County	NJ - Bergen County	BER-L-7308-14	Yes	The Maher Law Firm
Aguirre-Hill	Michelle	Aguirre-Hill, Michelle	NJ - Bergen County	NJ - Bergen County	BER-L-5552-15	Yes	Goza Homnold
Allen	Adrienne	Allen, Adrienne	NJ - Bergen County	NJ - Bergen County	BER-L-0455-14	Yes	DUPE? "served" Sanders Viener, Unfiled
Allen	Dana	Allen, Dana	NJ - Bergen County	NJ - Bergen County	BER-L-7997-13	Yes	The Orlando Firm
Alshamrani	Nora	Alshamrani, Nora Hamzah	NJ - Bergen County	NJ - Bergen County	BER-L-3319-16	Yes	Morgan & Morgan
Anderson-Harris	Brianne	Anderson-Harris, Brianne	NJ - Morris County	NJ - Bergen County	BER-L-4751-13	Yes	Matthews & Associates
Anding (NJ)	Samantha	Anding, Samantha (NJ)	NJ - Bergen County	NJ - Bergen County	BER-L-8886-13	Yes	Heninger Garrison Davis LLC
Andringa	Connie	Andringa, Connie	NJ - Bergen County	NJ - Bergen County	BER-L-3781-15	Yes	Girardi Keese
Armstrong	Angelica	Armstrong, Angela	NJ - Bergen County	NJ - Bergen County	BER-L-0284-14	Yes	Matthews & Associates
Arneson	Deanna	Arneson, Deanna	NJ - Bergen County	NJ - Bergen County	BER-L-8842-14	Yes	Heninger Garrison Davis LLC
Arteaga	Rosa	Arteaga, Rosa	NJ - Bergen County	NJ - Bergen County	BER-L-3697-15	Yes	Gacovino, Lake & Associates, PC
Aviso	Morlah	Aviso, Morlah	NJ - Bergen County	NJ - Bergen County	BER-L-9020-17	Yes	Heninger Garrison Davis LLC
Ayissi	Ernestine	Ayissi, Ernestine	NJ - Morris County	NJ - Bergen County	BER-L-4757-13	Yes	Parker Waichman
Bailey	Renita	Bailey, Renita	NJ - Bergen County	NJ - Bergen County	BER-L-3720-15	Yes	Hissey Klientz
Bancroft	Deborah	Bancroft, Deborah	NJ - Bergen County	NJ - Bergen County	BER-L-4593-15	Yes	Heninger Garrison Davis LLC
Barrett	Peggy	Barrett, Peggy	NJ - Bergen County	NJ - Bergen County	BER-L-6974-14	Yes	Matthews & Associates
Bates	Yarnell	Bates, Yarnell	NJ - Morris County	NJ - Bergen County	BER-L-4778-13	Yes	Parker Waichman
Be'Ans	Courtney	Be'Ans, Courtney	NJ - Bergen County	NJ - Bergen County	BER-L-3780-15	Yes	Girardi Keese

Bell	Stephanie	Bell, Stephanie	NJ - Bergen County	NJ - Bergen County	BER-L-5814-15	Yes	Goza Honnold
Berteau	Margo	Berteau, Margo	NJ - Bergen County	NJ - Bergen County	BER-L-0344-14	Yes	Matthews & Associates
Beseler	Heather	Beseler, Heather	NJ - Morris County	NJ - Bergen County	BER-L-4677-13	Yes	Parker Waichman
Bester	Keahna	Bester, Keahna	NJ - Bergen County	NJ - Bergen County	BER-L-3661-17	Yes	Bernstein Liebhard
Beyer	Cassie	Beyer, Cassie	NJ - Morris County	NJ - Bergen County	BER-L-4661-13	Yes	Parker Waichman
Blair	Elizabeth	Blair, Elizabeth	NJ - Bergen County	NJ - Bergen County	BER-L-2302-15	Yes	Wientz, Goldman, Spitzer
Block	Megan	Block, Megan	NJ - Morris County	NJ - Bergen County	BER-L-4678-13	Yes	Parker Waichman
Bouwma	Leanne	Bouwma, Leanne	NJ - Bergen County	NJ - Bergen County	BER-L-7790-14	Yes	Heninger Garrison Davis LLC
Bowman	Warigia	Bowman, Warigia	NJ - Bergen County	NJ - Bergen County	BER-L-20724-14	Yes	Provost Umphrey
Bozzuto	Bernadette	Bozzuto, Bernadette	NJ - Bergen County	NJ - Bergen County	BER-L-7606-14	Yes	Heninger Garrison Davis LLC
Branch	Erica	Branch, Erica	NJ - Bergen County	NJ - Bergen County	BER-L-883-15	Yes	Matthews & Associates
Bridges	Judith	Bridges, Judith	NJ - Bergen County	NJ - Bergen County	BER-L-4517-15	Yes	Bernstein Liebhard
Britain	Ashley	Britain, Ashley	NJ - Bergen County	NJ - Bergen County	BER-L-9707-15	Yes	Girardi Keese
Brown	Roxanne	Brown, Roxanne	NJ - Bergen County	NJ - Bergen County	BER-L-4760-15	Yes	Rheingold Giuffra Ruffo & Plotkin LLP
Buchmann	Katelyn	Buchmann, Katelyn	NJ - Bergen County	NJ - Bergen County	BER-L-5693-15	Yes	Bernstein Liebhard
Buehler	Alexis Anne	Buehler, Alexis Anne	NJ - Bergen County	NJ - Bergen County	BER-L-9589-14	Yes	Molley Rice
Buffington	Theresa	Buffington, Theresa	NJ - Bergen County	NJ - Bergen County	BER-L-3772-15	Yes	Gacovino, Lake & Associates, PC
Bush	Latoyia	Bush, Latoyia	NJ - Bergen County	NJ - Bergen County	BER-L-7806-16	Yes	Heninger Garrison Davis LLC
Bushman	Kylee	Bushman, Kylee	NJ - Bergen County	NJ - Bergen County	BER-L-7135-14	Yes	Hollis, Wright, Clay & Vail
Bustamante	Christina	Bustamante, Christina	NJ - Bergen County	NJ - Bergen County	BER-L-3652-16	Yes	Heninger Garrison Davis LLC

Carlson	Heather	Carlson, Heather	NJ - Bergen County	NJ - Bergen County	BER-L-6545-13	Yes	Meyers & Flowers
Carpenter (Kimball)	Carissa	Carpenter, Carissa	NJ - Bergen County	NJ - Bergen County	BER-L-2296-14	Yes	Goza Honnold
Castillo	Marlene	Castillo, Marlene Cordoba	NJ - Bergen County	NJ - Bergen County	BER-L-8722-17	Yes	Parker Waichman // Johnson Becker
Castro	Maria	Castro, Maria	NJ - Bergen County	NJ - Bergen County	BER-L-19638-14	Yes	Mathews & Associates
Cates	Stephanie	Cates, Stephanie	NJ - Bergen County	NJ - Bergen County	BER-L-0188-14	Yes	Parker Waichman
Caudle	Charlene	Caudle, Charlene	NJ - Bergen County	NJ - Bergen County	BER-L-4020-15	Yes	Heninger Garrison Davis LLC
Caulfield	Deanna	Caulfield, Deanna	NJ - Bergen County	NJ - Bergen County	BER-L-9712-15	Yes	Girardi Keese
Cavin	Amber	Cavin, Amber	NJ - Bergen County	NJ - Bergen County	BER-L-3188-16	Yes	Cory Watson
Cessna	Katherine	Cessna, Katherine	NJ - Bergen County	NJ - Bergen County	BER-L-3534-14	Yes	Parker Waichman
Challinor	Sonja	Challinor, Sonja	NJ - Bergen County	NJ - Bergen County	BER-L-8639-13	Yes	Parker Waichman
Chanthala	Lena	Chanthala, Lena	NJ - Bergen County	NJ - Bergen County	BER-L-954-16	Yes	Bernstein Liebhard
Clarke	Jennifer	Clarke, Jennifer	NJ - Bergen County	NJ - Bergen County	BER-L-3760-15	Yes	Gacovino, Lake & Associates, PC
Cleary	Stephanie	Cleary, Stephanie	NJ - Bergen County	NJ - Bergen County	BER-L-19496-14	Yes	Bernstein Liebhard
Clem	Amy	Clem, Amy	NJ - Bergen County	NJ - Bergen County	BER-L-1302-14	Yes	Kirkendall Dwyer
Clemons-Heat	Cynthia	Clemons-Heat, Cynthia	NJ - Bergen County	NJ - Bergen County	BER-L-3688-15	Yes	Gacovino, Lake & Associates, PC
Colon	Erin	Colon, Erin	NJ - Bergen County	NJ - Bergen County	BER-L-2922-14	Yes	Nast Law
Copley	Courtney	Copley, Courtney	NJ - Bergen County	NJ - Bergen County	BER-L-5705-14	Yes	Johnson Becker
Corbin	Megan	Corbin, Megan	NJ - Bergen County	NJ - Bergen County	BER-L-6893-16	Yes	Johnson Becker
Davenport	Chrystal	Davenport, Chrystal	NJ - Bergen County	NJ - Bergen County	BER-L-9738-15	Yes	Girardi Keese
Davis	Bekki	Davis, Bekki Jane and Josh Davis	NJ - Bergen County	NJ - Bergen County	BER-L-10672-15	Yes	Pogust Braslow & Millroad, LLC

Davis	Jordan	Davis, Patricia	NJ - Bergen County	NJ - Bergen County	BER-L-4536-15	Consortium Claim	
Day	Jennifer L.	Day, Jennifer L.	NJ - Bergen County	NJ - Bergen County	BER-L-19668-14	Yes	Goldenberg Heller & Antognoli, PC
Dease	Jessica	Dease, Jessica	NJ - Bergen County	NJ - Bergen County	BER-L-3650-15	Yes	Girardi Keese
Debusk	Tempestt	Debusk, Tempestt	NJ - Bergen County	NJ - Bergen County	BER-L-8700-15	Yes	Hissey Klientz
Delgado	Alicia	Delgado, Alicia	NJ - Bergen County	NJ - Bergen County	BER-L-9020-14	Yes	Hissey Klientz
Deshotel	Sierra	Deshotel, Sierra	NJ - Bergen County	NJ - Bergen County	BER-L-9044-13	Yes	Goza Honnold
Dinh	Thuy	Dinh, Thuy	NJ - Bergen County	NJ - Bergen County	BER-L-6954-14	Yes	Parker Waichman
Downing	Natia	Downing, Natia	NJ - Bergen County	NJ - Bergen County	BER-L-6970-15	Yes	Fling Law Firm, LLC
Draper	Sade	Draper, Sade	NJ - Bergen County	NJ - Bergen County	BER-L-7168-14	Yes	Goza Honnold
Dresback	Matthew	Dresback, Loretta	NJ - Bergen County	NJ - Bergen County	BER-L-0710-14	Consortium Claim	Sanders Phillips Grossman
Drum	Erica	Drum, Erica	NJ - Bergen County	NJ - Bergen County	BER-L-7808-16	Yes	Heninger Garrison Davis LLC
Dubray	Emily	Dubray, Emily	NJ - Bergen County	NJ - Bergen County	BER-L-9349-13	Yes	Matthews & Associates
Dubreaull	Larry	Dubreuil, Donna	NJ - Bergen County	NJ - Bergen County	BER-L-9339-15	Consortium Claim	
Duh	Jasmine	Duh, Jasmine	NJ - Bergen County	NJ - Bergen County	BER-L-20292-14	Yes	Matthews & Associates
Dwyer	Robyn	Dwyer, Robyn	NJ - Bergen County	NJ - Bergen County	BER-L-8377-16	Yes	Provost Umphrey
Eckerstrand	Meghann	Eckerstrand, Meghann	NJ - Bergen County	NJ - Bergen County	BER-L-5757-13	Yes	Meyers & Flowers
Edwards	Elizabeth	Edwards, Elizabeth Anne	NJ - Bergen County	NJ - Bergen County	BER-L-8906-16	Yes	Barnstein Liebhard
Ehle	Cathy	Ehle, Cathy	NJ - Bergen County	NJ - Bergen County	BER-L-6621-14	Yes	Heninger Garrison Davis LLC
Ejnik	Adam	Goldwater, Shannon	NJ - Bergen County	NJ - Bergen County	BER-L-20303-14	Consortium Claim	
Elliott	Kimberly	Elliott, Kimberly	NJ - Morris County	NJ - Bergen County	BER-L-4822-13	Yes	Motley Rice
Engle	Shannon	Engle, Shannon	NJ - Bergen County	NJ - Bergen County	BER-L-7634-14	Yes	Discepolo LLP

Espericueta	Jose	Espericueta, Aracely	NJ - Bergen County	NJ - Bergen County	BER-L-3632-15	Consortium Claim	
Eubank	Shawna	Eubank, Shawna	NJ - Bergen County	NJ - Bergen County	BER-L-5705-13	Yes	Parker Waichman
Evans	Lisa	Evans, Lisa	NJ - Bergen County	NJ - Bergen County	BER-L-3974-14	Yes	Bernstein Liebhard
Fernandez	María	Fernandez, María	NJ - Bergen County	NJ - Bergen County	BER-L-8242-14	Yes	Lanier Law Firm
Fernandez	Tygen	Fernandez, Tygen	NJ - Bergen County	NJ - Bergen County	BER-L-6125-15	Yes	Seeger Weiss
Fitzpatrick	Charles	Fitzpatrick, Ashton	NJ - Bergen County	NJ - Bergen County	BER-L-6890-14	Consortium Claim	
Fonseca	Martha	Fonseca, Martha	NJ - Bergen County	NJ - Bergen County	BER-L-10046-14	Yes	Matthews & Associates
Fouk	Erika	Fouk, Erika	NJ - Bergen County	NJ - Bergen County	BER-L-3351-15	Yes	Hiskey Kientz
Fourqurean	Antonio	Woodrum-Fourqurean,	NJ - Bergen County	NJ - Bergen County	BER-L-8547-13	Consortium Claim	
Giannandrea	Jessica	Giannandrea, Jessica	NJ - Bergen County	NJ - Bergen County	BER-L-3894-15	Yes	Heninger Garrison Davis LLC
Gillespie	Casondra	Gillespie, Casondra	NJ - Bergen County	NJ - Bergen County	BER-L-20284-14	Yes	Matthews & Associates
Gilmete	Courtnie	Gilmete, Courtnie	NJ - Bergen County	NJ - Bergen County	BER-L-1536-14	Yes	Rheingold Giuffra Ruffo & Plotkin LLP
Gomez	Kathy	Gomez, Kathy	NJ - Bergen County	NJ - Bergen County	BER-L-3641-15	Yes	Bernstein Liebhard
Gomez	Lea	Gomez, Lea	NJ - Morris County	NJ - Bergen County	BER-L-4798-13	Yes	Parker Waichman
Gonzales	Briana	Gonzales, Briana	NJ - Bergen County	NJ - Bergen County	BER-L-1905-14	Yes	Locks Law Firm
Grant	Jacquelyn	Grant, Jacquelyn	NJ - Bergen County	NJ - Bergen County	BER-L-8209-14	Yes	Bernstein Liebhard
Gray	Charmaine	Gray, Charmaine	NJ - Bergen County	NJ - Bergen County	BER-L-1931-15	Yes	Law Offices of ENGSTROM, LIPSCOMB & LACK
Green	Paige	Green, Paige	NJ - Bergen County	NJ - Bergen County	BER-L-7234-14	Yes	Heninger Garrison Davis LLC
Guerrero	Joseph	Kessler, Catherine	NJ - Bergen County	NJ - Bergen County	BER-L-1118-14	Consortium Claim	
Gutierrez	Hugo	Gutierrez, Luz	NJ - Bergen County	NJ - Bergen County	BER-L-20613-14	Consortium Claim	

Hall	Craig	Hall, Ashleigh	NJ - Morris County	NJ - Bergen County	BER-L-6842-13	Consortium Claim	The Waiters Law Firm
Hall	Cymantha	Hall, Cymantha	NJ - Bergen County	NJ - Bergen County	BER-L-4427-14	Yes	The Waiters Law Firm
Harding	Erica	Harding, Erica	NJ - Bergen County	NJ - Bergen County	BER-L-1904-15	Yes	Law Offices of ENGSTROM, LIPSCOMB & LACK
Hardy	Willmeta	Hardy, Willmeta T	NJ - Bergen County	NJ - Bergen County	BER-L-10087-14	Yes	Motley Rice
Haring	Nikole	Haring, Nikole	NJ - Bergen County	NJ - Bergen County	BER-L-6630-14	Yes	Cory Watson
Harris	Rebecca	Harris, Rebecca	NJ - Bergen County	NJ - Bergen County	BER-L-3264-15	Yes	Lynch Daskal Emery LLP
Harris	Stephanie	Harris, Stephanie	NJ - Bergen County	NJ - Bergen County	BER-L-172-16	Yes	Bernstein Liebhard
Haskins	Kimberly	Haskins, Kimberly	NJ - Bergen County	NJ - Bergen County	BER-L-6955-14	Yes	Parker Waichman
Hay	Courtney	Hay, Courtney	NJ - Bergen County	NJ - Bergen County	BER-L-1322-14	Yes	Seeger Weiss
Henderson	Casey	Henderson, Casey	NJ - Morris County	NJ - Bergen County	BER-L-4679-13	Yes	Parker Waichman
Herrig	Joey	Herrig, Joey	NJ - Bergen County	NJ - Bergen County	BER-L-2427-15	Yes	Bernstein Liebhard
Horn	Kimberly Ann	Horn, Kimberly Ann Louise	NJ - Bergen County	NJ - Bergen County	BER-L-469-15	Yes	Motley Rice
Ingram	Crystal	Ingram, Crystal	NJ - Bergen County	NJ - Bergen County	BER-L-5078-14	Yes	Bernstein Liebhard
Iovino	Coleen	Iovino, Coleen	NJ - Bergen County	NJ - Bergen County	BER-L-9495-14	Yes	Matthews & Associates
Isley	Amber	Isley, Amber	NJ - Bergen County	NJ - Bergen County	BER-L-2067-16	Yes	Bernstein Liebhard
Jaramillo	Melissa	Jaramillo, Melissa	NJ - Morris County	NJ - Bergen County	BER-L-4763-13	Yes	Parker Waichman
Jaskiel	Samantha	Jaskiel, Samantha	NJ - Morris County	NJ - Bergen County	BER-L-4837-13	Yes	Parker Waichman
Jastorff	Aeriell	Jastorff, Aeriell	NJ - Bergen County	NJ - Bergen County	BER-L-3158-14	Yes	Hissey Kientz
Jensen	Mackenzie	Jensen, Mackenzie	NJ - Bergen County	NJ - Bergen County	BER-L-20728-14	Yes	Bohrer Brady
Johnson (Griffin)	Samantha	Griffin, Samantha	NJ - Bergen County	NJ - Bergen County	BER-L-19219-14	Yes	Matthews & Associates
Johnson	Kallie Rae	Johnson, Kallie	NJ - Bergen County	NJ - Bergen County	BER-L-8694-13	Yes	The Orlando Firm

Johnson	Nicole	Johnson, Nicole	NJ - Bergen County	NJ - Bergen County	BER-L-8231-14	Yes	Provost Umphrey
Johnson	Nyjah	Johnson, Nyjah	NJ - Bergen County	NJ - Bergen County	BER-L-9681-15	Yes	Girardi Keese
Jolly	Kayla	Jolly, Kayla	NJ - Bergen County	NJ - Bergen County	BER-L-7706-14	Yes	Provost Umphrey
Jones	Eskandonna	Jones, Eskandonna	NJ - Bergen County	NJ - Bergen County	BER-L-6971-14	Yes	Mathews & Associates
Jones	Marquita	Jones, Marquita	NJ - Bergen County	NJ - Bergen County	BER-L-3199-16	Yes	Cory Watson
Jones	Samantha	Jones, Samantha	NJ - Bergen County	NJ - Bergen County	BER-L-8550-13	Yes	Parker Waichman
Jones	Traci	Jones, Traci	NJ - Bergen County	NJ - Bergen County	BER-L-9234-15	Yes	Heninger Garrison Davis LLC
Jordan	Laura	Jordan, Laura	NJ - Bergen County	NJ - Bergen County	BER-L-928-18	Yes	Bernstein Liebhard
Keen	Robbie	Keen, Robbie	NJ - Bergen County	NJ - Bergen County	BER-L-0324-14	Yes	Parker Waichman
Kelley	Falicia	Kelley, Falicia	NJ - Bergen County	NJ - Bergen County	BER-L-1903-15	Yes	Law Offices of ENGSTROM, LIPSCOMB & LACK
Kerrigan	Veronica	Kerrigan, Veronica	NJ - Bergen County	NJ - Bergen County	BER-L-2269-14	Yes	Lanier Law Firm
Khandilyan	Ruzanne	Khandilyan, Ruzanna	NJ - Bergen County	NJ - Bergen County	BER-L-7567-14	Yes	Hollis, Wright, Clay & Vail
Kingbird	Cherie	Kingbird, Cherie	NJ - Bergen County	NJ - Bergen County	BER-L-8773-13		Meyers & Flowers
Klingenberg	Stephanie	Klingenberg, Stephanie	NJ - Bergen County	NJ - Bergen County	BER-L-3550-14	Yes	Anapol Weiss
Klinger	Abraham	Klinger, Leslie	NJ - Bergen County	NJ - Bergen County	BER-L-9191-14	Consortium Claim	
Knutson	Natalie	Knutson, Natalie	NJ - Bergen County	NJ - Bergen County	BER-L-6220-16	Yes	The Levensten Law Firm
Kourouma	Issa	Toliver, Nicole	NJ - Bergen County	NJ - Bergen County	BER-L-3410-13	Consortium Claim	
Kuenzi	Tiffany	Kuenzi, Tiffany	NJ - Bergen County	NJ - Bergen County	BER-L-2018-15	Yes	Bernstein Liebhard
Kyles	Wesley	Kyles, Alma	NJ - Bergen County	NJ - Bergen County	BER-L-1170-15	Consortium Claim	
Landers	Betsy	Landers, Betsy	NJ - Morris County	NJ - Bergen County	BER-L-4704-13	Yes	Johnson Becker
Larrison	Amanda	Larrison, Amanda	NJ - Bergen County	NJ - Bergen County	BER-L-3432-14	Yes	Hissey Klientz

Le	Sandy	Le, Sandy	NJ - Bergen County	NJ - Bergen County	BER-L-19497-14	Yes	Bernstein Liebhard
Legg	Rebecca	Legg, Rebecca	NJ - Bergen County	NJ - Bergen County	BER-L-3038-15	Yes	Levin Simes LLP
Lent	Alicia	Lent, Alicia	NJ - Bergen County	NJ - Bergen County	BER-L-8157-17	Yes	Bernstein Liebhard
Lipka	Melanie	Lipka, Melanie	NJ - Bergen County	NJ - Bergen County	BER-L-8145-14	Yes	Parker Waichman
Little	Samantha	Little, Samantha	NJ - Bergen County	NJ - Bergen County	BER-L-6842-14	Yes	Hisey Kientz
Long	Amanda	Long, Amanda	NJ - Bergen County	NJ - Bergen County	BER-L-1930-15	Yes	Law Offices of ENGSTROM, LIPSCOMB & LACK
Lucero	Jeannie	Lucero, Jeannie	NJ - Bergen County	NJ - Bergen County	BER-L-0925-13	Yes	Parker Waichman
Mabli	Barbara	Mabli, Barbara	NJ - Bergen County	NJ - Bergen County	BER-L-6878-13	Yes	Meyers & Flowers
Maestas	Melissa	Maestas, Melissa	NJ - Bergen County	NJ - Bergen County	BER-L-7073-14	Yes	Skikos Crawford
Magnani	Amber	Magnani, Amber	NJ - Bergen County	NJ - Bergen County	BER-L-2014-15	Yes	Bernstein Liebhard
Maher	Nicole	Maher, Nicole	NJ - Bergen County	NJ - Bergen County	BER-L-2266-14	Yes	Goza Honnold
Malave	Rouchelyn	Malave, Rouchelyn	NJ - Bergen County	NJ - Bergen County	BER-L-9492-14	Yes	Provost Umphrey
Mandrell	Samantha	Mandrell, Samantha	NJ - Bergen County	NJ - Bergen County	BER-L-6402-15	Yes	Matthews & Associates
Mardis	Lauree	Mardis, Lauree	NJ - Bergen County	NJ - Bergen County	BER-L-4758-14	Yes	Heninger Garrison Davis LLC
Martin	Alicia	Martin, Alicia	NJ - Bergen County	NJ - Bergen County	BER-L-4898-13	Yes	Parker Waichman
Maxwell	Krysten	Maxwell, Krysten	NJ - Bergen County	NJ - Bergen County	BER-L-6893-14	Yes	Bernstein Liebhard
McCabe	Brianne	McCabe, Brianne	NJ - Bergen County	NJ - Bergen County	BER-L-3039-16	Yes	Provost Umphrey
McCain	Elizabeth	McCain, Elizabeth	NJ - Bergen County	NJ - Bergen County	BER-L-2008-15	Yes	Bernstein Liebhard
McCoy	Samantha	McCoy, Samantha	NJ - Bergen County	NJ - Bergen County	BER-L-3017-14	Yes	Molley Rice
McDowell	Leeanna	McDowell, Leeanna	NJ - Bergen County	NJ - Bergen County	BER-L-7329-15	Yes	Sanders Phillips Grossman
McGuire	Michele	McGuire, Michele	NJ - Bergen County	NJ - Bergen County	BER-L-3485-14	Yes	Bernstein Liebhard

McKee	Amanda	McKee, Amanda	NJ - Bergen County	NJ - Bergen County	BER-L-1618-15	Yes	Matthews & Associates
McKee	Amanda	McKee, Amanda	NJ - Bergen County	NJ - Bergen County	BER-L-20398-14	Yes	Matthews & Associates
McKee	Tiffany	McKee, Tiffany	NJ - Bergen County	NJ - Bergen County	BER-L-20098-14	Yes	Hissey Kientz
McKinney	Kameshia	McKinney, Kameshia	NJ - Bergen County	NJ - Bergen County	BER-L-2571-14	Yes	Motley Rice
McMillan	Megan	McMillan, Megan	NJ - Bergen County	NJ - Bergen County	BER-L-2017-15	Yes	Bernstein Liebhard
Menefee	Sherri	Menefee, Sherri	NJ - Bergen County	NJ - Bergen County	BER-L-9876-14	Yes	Sanders Phillips Grossman
Miera	Amanda	Miera, Amanda	NJ - Bergen County	NJ - Bergen County	BER-L-4044-13	Yes	Parker Waichman
Miller	Meagan	Miller, Meagan	NJ - Bergen County	NJ - Bergen County	BER-L-7720-14	Yes	Parker Waichman
Miller	Misty	Miller, Misty	NJ - Bergen County	NJ - Bergen County	BER-L-9019-17	Yes	Heninger Garrison Davis LLC
Mills	Angel	Mills, Angel	NJ - Bergen County	NJ - Bergen County	BER-L-0686-14	Yes	Parker Waichman
Miras	Elizabeth	Miras, Elizabeth	NJ - Bergen County	NJ - Bergen County	BER-L-3723-14	Yes	Beasley Allen
Mobley	Celina	Mobley, Celina	NJ - Bergen County	NJ - Bergen County	BER-L-19221-14	Yes	Matthews & Associates
Mogile	Rachel	Mogile, Rachel	NJ - Bergen County	NJ - Bergen County	BER-L-3266-15	Yes	Meyers & Flowers
Monahan	Susan	Monahan, Susan	NJ - Bergen County	NJ - Bergen County	BER-L-7717-13	Yes	Parker Waichman
Morales	Jessica	Morales, Jessica	NJ - Bergen County	NJ - Bergen County	BER-L-7723-13	Yes	Meyers & Flowers
Moreno	Nancy	Moreno, Nancy	NJ - Bergen County	NJ - Bergen County	BER-L-5736-17	Yes	The Levensten Law Firm
Morfin	Nancy	Morfin, Nancy	NJ - Bergen County	NJ - Bergen County	BER-L-7661-13	Yes	Motley Rice
Morris	Vanessa	Morris, Vanessa	NJ - Bergen County	NJ - Bergen County	BER-L-291-15	Yes	Bernstein Liebhard
Morse	Kimberly	Morse, Kimberly	NJ - Bergen County	NJ - Bergen County	BER-L-7364-13	Yes	Parker Waichman
Moses	Melissa	Moses, Melissa	NJ - Bergen County	NJ - Bergen County	BER-L-7812-17	Yes	The Levensten Law Firm
Moura	Eddie	Moura, Emily	NJ - Bergen County	NJ - Bergen County	BER-L-8728-13	Consortium Claim	
Mukhtar	Debbie	Mukhtar, Debbie	NJ - Bergen County	NJ - Bergen County	BER-L-2919-14	Yes	Nast Law

Mullins	Brandi	Mullins, Brandi	NJ - Bergen County	NJ - Bergen County	BER-L-9710-14	Yes	Mathews & Associates
Mundy	Jessica	Mundy, Jessica	NJ - Bergen County	NJ - Bergen County	BER-L-10708-15	Yes	Bernstein Liebhard
Najera	Alicia	Najera, Alicia	NJ - Bergen County	NJ - Bergen County	BER-L-19673-14	Yes	Mathews & Associates
Nash	Paige	Nash, Paige	NJ - Bergen County	NJ - Bergen County	BER-L-689-15	Yes	Mathews & Associates
Nicholson	Marah	Nicholson, Marah	NJ - Bergen County	NJ - Bergen County	BER-L-3339-17	Yes	Johnson Becker
Nicodemus	Chelsey	Nicodemus, Chelsey	NJ - Bergen County	NJ - Bergen County	BER-L-1318-14	Yes	Seeger Weiss
Noel	Samantha	Noel, Samantha S	NJ - Bergen County	NJ - Bergen County	BER-L-2933-15	Yes	Motley Rice
Nwanze	Nkechi	Nwanze, Nkechi	NJ - Bergen County	NJ - Bergen County	BER-L-8699-13	Yes	The Orlando Firm
Oni	Damilola	Oni, Damilola	NJ - Bergen County	NJ - Bergen County	BER-L-3722-15	Yes	Hissey Kientz
Paire	Traci	Paire, Traci	NJ - Bergen County	NJ - Bergen County	BER-L-6081-16	Yes	Parker Waichman
Palma	Angelica	Palma, Angelica	NJ - Bergen County	NJ - Bergen County	BER-L-7264-14	Yes	Goza Honnold
Parson	Tanya	Parson, Tanya	NJ - Bergen County	NJ - Bergen County	BER-L-6623-14	Yes	Heninger Garrison Davis LLC
Paulsen	Rebekah	Paulsen, Rebekah	NJ - Bergen County	NJ - Bergen County	BER-L-3965-14	Yes	Parker Waichman
Pead	Lindsey	Pead, Lindsey	NJ - Bergen County	NJ - Bergen County	BER-L-9022-17	Yes	Heninger Garrison Davis LLC
Peredeliskaya	Natalia	Peredeliskaya, Natalia	NJ - Bergen County	NJ - Bergen County	BER-L-9321-14	Yes	Motley Rice
Perez	Carmarin	Perez, Carmarin	NJ - Bergen County	NJ - Bergen County	BER-L-4122-14	Yes	Bernstein Liebhard
Perez	Kathy	Perez, Kathy	NJ - Bergen County	NJ - Bergen County	BER-L-186-15	Yes	Heninger Garrison Davis LLC
Perez	Thelma	Perez, Thelma	NJ - Bergen County	NJ - Bergen County	BER-L-8210-14	Yes	Bernstein Liebhard
Petrosky	Micaela	Petrosky, Micaela Joelle	NJ - Bergen County	NJ - Bergen County	BER-L-2026-15	Yes	Motley Rice
Phongmany	Anna	Phongmany, Anna	NJ - Bergen County	NJ - Bergen County	BER-L-4737-14	Yes	Goza Honnold

Porter	Alicia	Porter, Alicia	NJ - Bergen County	NJ - Bergen County	BER-L-4992-14	Yes	Hissey Kientz
Poteet	Kelsi	Poteet, Kelsi	NJ - Bergen County	NJ - Bergen County	BER-L-2605-15	Yes	Wilentz, Goldman & Spitzer
Poullich	Angelo	Poullich, Aislinn	NJ - Bergen County	NJ - Bergen County	BER-L-4839-14	Consortium Claim	
Ramos	Elizabeth	Ramos, Elizabeth Cardenas	NJ - Bergen County	NJ - Bergen County	BER-L-2664-16	Yes	Bernstein Liebhart
Ramos	Sarah	Ramos, Sarah A	NJ - Bergen County	NJ - Bergen County	BER-L-8714-14	Yes	Parker Waichman
Randolph	Ashley	Randolph, Ashley	NJ - Bergen County	NJ - Bergen County	BER-L-8876-13	Yes	Heninger Garrison Davis LLC
Restrepo	Kelly	Restrepo, Kelly D.	NJ - Bergen County	NJ - Bergen County	BER-L-345-17	Yes	Motley Rice
Reyes	Kristen	Reyes, Kristen	NJ - Bergen County	NJ - Bergen County	BER-L-955-16	Yes	Bernstein Liebhart
Richards	Jenna	Richards, Jenna	NJ - Bergen County	NJ - Bergen County	BER-L-4754-14	Yes	Matthews & Associates
Richardson	Courtney	Richardson, Courtney	NJ - Bergen County	NJ - Bergen County	BER-L-1895-15	Yes	Law Offices of ENGSTROM, LIPSCOMB & LACK
Rivera	Crystal	Rivera, Crystal	NJ - Bergen County	NJ - Bergen County	BER-L-9274-13	Yes	Rheingold Gluffra Ruffo & Plotkin LLP
Roberts	Angela	Roberts, Angela	NJ - Bergen County	NJ - Bergen County	BER-L-8197-14	Yes	Sanders Phillips Grossman
Robertson	Michael	Robertson, Veronica	NJ - Bergen County	NJ - Bergen County	BER-L-9091-14	Consortium Claim	
Robinson	Jessica	Robinson, Jessica	NJ - Bergen County	NJ - Bergen County	BER-L-5111-13	Yes	Matthews & Associates
Rodriguez	Angelo	Rodriguez, Maria	NJ - Bergen County	NJ - Bergen County	BER-L-7069-14	Consortium Claim	
Rodriguez	Juan	Rivera, Emily	NJ - Bergen County	NJ - Bergen County	BER-L-2294-14	Consortium Claim	
Roman	Angela	Roman, Angela	NJ - Bergen County	NJ - Bergen County	BER-L-9749-14	Yes	Skikos Crawford
Rosalez	Ashley	Rosalez, Ashely	NJ - Bergen County	NJ - Bergen County	BER-L-7076-14	Yes	Motley Rice
Saab	Neil	Saab, Neil	NJ - Morris County	NJ - Bergen County	BER-L-4667-13	Yes	Parker Waichman
Salas	Maribel	Salas, Maribel	NJ - Bergen County	NJ - Bergen County	BER-L-3554-16	Yes	Bernstein Liebhart

Salazar	Valeria	Salazar, Valeria	NJ - Bergen County	NJ - Bergen County	BER-L-8974-14	Yes	Motley Rice
Salem	Julie	Salem, Julie	NJ - Bergen County	NJ - Bergen County	BER-L-2511-14	Yes	Matthews & Associates
Santiago	Leann	Santiago, Leann	NJ - Bergen County	NJ - Bergen County	BER-L-4195-15	Yes	Hissey Kientz
Sawyers	Sarah	Sawyers, Sarah	NJ - Bergen County	NJ - Bergen County	BER-L-9943-14	Yes	Milstein Jackson Fairchild & Wade
Scharfe	Rose	Scharfe, Rose E.	NJ - Bergen County	NJ - Bergen County	BER-L-8592-16	Yes	Motley Rice
Scroggins	Lauren	Scroggins, Lauren	NJ - Bergen County	NJ - Bergen County	BER-L-4893-14	Yes	Matthews & Associates
Semler	Allison	Semler, Allison	NJ - Bergen County	NJ - Bergen County	BER-L-3751-14	Yes	Anapol Weiss
Shane	Brandy	Shane, Brandy	NJ - Bergen County	NJ - Bergen County	BER-L-00159-16	Yes	Morgan & Morgan
Shea	Britney	Shea, Britney	NJ - Bergen County	NJ - Bergen County	BER-L-6718-13	Yes	Matthews & Associates
Silva	Laura	Silva, Laura	NJ - Bergen County	NJ - Bergen County	BER-L-8977-14	Yes	Parker Waichman
Simon	Ryan	Simon, Jennifer	NJ - Morris County	NJ - Bergen County	BER-L-4708-13	Consortium Claim	
Singletary	Nicole	Singletary, Nicole	NJ - Bergen County	NJ - Bergen County	BER-L-0303-14	Yes	Parker Waichman
Singleton	Shaunessy	Singleton, Shaunessy	NJ - Bergen County	NJ - Bergen County	BER-L-3635-15	Yes	Gacovino, Lake & Associates, PC
Skipp	Danelle	Skipp, Danelle	NJ - Bergen County	NJ - Bergen County	BER-L-1291-15	Yes	Anapol Weiss
Slaughter	Lakresha	Slaughter, Lakresha	NJ - Bergen County	NJ - Bergen County	BER-L-9264-13	Yes	Parker Waichman
Sloan	Lamonda	Sloan, Lamonda	NJ - Morris County	NJ - Bergen County	BER-L-4841-13	Yes	Matthews & Associates
Smith	Coral	Smith, Nioka	NJ - Bergen County	NJ - Bergen County	BER-L-7238-14	Consortium Claim	
Smith	Starr	Smith, Starr	NJ - Bergen County	NJ - Bergen County	BER-L-6404-15	Yes	Matthews & Associates
Snow	Natasha	Snow, Natasha	NJ - Bergen County	NJ - Bergen County	BER-L-8533-14	Yes	The Maher Law Firm
Soria	Victor	Soria, Audrey	NJ - Bergen County	NJ - Bergen County	BER-L-5815-15	Consortium Claim	
Sovel	Tia	Sovel, Tia	NJ - Bergen County	NJ - Bergen County	BER-L-5286-13	Yes	Matthews & Associates
Stapus	Elesha	Stapus, Elesha	NJ - Bergen County	NJ - Bergen County	BER-L-8141-14	Yes	Goldenberg Heller & Antognoli, PC

Starnes	Courtney	Starnes, Courtney	NJ - Bergen County	NJ - Bergen County	BER-L-19919-14	Yes	Matthews & Associates
Stephens	Jesse	Stephens, Jennifer	NJ - Bergen County	NJ - Bergen County	BER-L-2392-14	Consortium Claim	
Sterling	Jamie	Sterling, Jamie	NJ - Bergen County	NJ - Bergen County	BER-L-293-15	Yes	Anapol Weiss
Stewart	Candise	Stewart, Candise	NJ - Bergen County	NJ - Bergen County	BER-L-6140-14	Yes	Johnson Becker
Sutton	Jessica	Sutton, Jessica	NJ - Bergen County	NJ - Bergen County	BER-L-9700-15	Yes	Girardi Keese
Thomas	Fayreyaud	Thomas, Fayreyaud	NJ - Bergen County	NJ - Bergen County	BER-L-4059-14	Yes	Nast Law
Thomas	Tabita	Thomas, Tabita	NJ - Bergen County	NJ - Bergen County	BER-L-8463-13	Yes	The Levensten Law Firm
Thornton	Andrew	Thornton, Heather	NJ - Bergen County	NJ - Bergen County	BER-L-7597-13	Consortium Claim	
Tiernan	Nicholas	Tiernan, Andrea	NJ - Bergen County	NJ - Bergen County	BER-L-4539-14	Consortium Claim	
Tubbs	Kayla	Tubbs, Kayla	NJ - Bergen County	NJ - Bergen County	BER-L-0240-14	Yes	Parker Waichman
Urteaga	Erica	Urteaga, Erica	NJ - Bergen County	NJ - Bergen County	BER-L-1002-15	Yes	Goza Honnold
Velador	Teresa	Velador, Teresa Zabala	NJ - Bergen County	NJ - Bergen County	BER-L-1896-15	Yes	Law Offices of ENGSTROM, LIPSCOMB & LACK
Ward	Erika	Ward, Erika	NJ - Bergen County	NJ - Bergen County	BER-L-3086-16	Yes	Rheingold Giuffra Ruffo & Plotkin LLP
Webster	Jacquera	Webster, Jacquera	NJ - Bergen County	NJ - Bergen County	BER-L-2389-15	Yes	Hollis, Wright, Clay & Vail
Wendell	Amber	Wendell, Amber	NJ - Bergen County	NJ - Bergen County	BER-L-820-15	Yes	Bernstein Liebhard
Whitlock	Stephanie	Whitlock, Stephanie	NJ - Bergen County	NJ - Bergen County	BER-L-8591-13	Yes	The Levensten Law Firm
Williams	Lateisha	Williams, Lateisha Dai'quana	NJ - Bergen County	NJ - Bergen County	BER-L-9025-14	Yes	Matthews & Associates
Williams	Marquita	Williams, Marquita	NJ - Bergen County	NJ - Bergen County	BER-L-1935-15	Yes	Law Offices of ENGSTROM, LIPSCOMB & LACK
Williams	Terri	Williams, Terri	NJ - Bergen County	NJ - Bergen County	BER-L-3546-14	Yes	Parker Waichman
Willis	Ashley	Willis, Ashley	NJ - Bergen County	NJ - Bergen County	BER-L-8627-14	Yes	The Levensten Law Firm

Wright	Cher	Wright, Cher	NJ - Bergen County	BER-L-9265-13	Yes	Parker Waichman
Zapata	Sara	Zapata, Sara	NJ - Bergen County	BER-L-0684-14	Yes	Parker Waichman
Zaragoza	Danielle	Zaragoza, Danielle	NJ - Bergen County	BER-L-2020-15	Yes	Bernstein Liebhard
Zmerzlikar	Mary	Zmerzlikar, Mary	NJ - Bergen County	BER-L-4892-15	Yes	Heninger Garrison Davis LLC

EXHIBIT B

[ADD APPROPRIATE CASE CAPTION]

NOTICE OF INTENT TO PROCEED

[Insert name of plaintiff(s)] hereby notifies the Court of [his/her] intent to:

- _____ Participate in the Confidential Master Settlement Agreement;
- _____ Not Participate in the Confidential Master Settlement Agreement, but authorize my counsel to submit a Stipulation of Dismissal, with prejudice, on my behalf; or,
- _____ Litigate his/her claims against the Bayer Defendant(s).

Dated: _____

[Signature of plaintiff]

EXHIBIT C

EXHIBIT D

[Counsel]
[Firm]
[Address]
[Tel.]

Attorneys for Plaintiff

----- X
CAPTION :
: SUPERIOR COURT OF NEW
: JERSEY LAW DIVISION:
: BERGEN COUNTY
:
: IN RE MIRENA IUD PRODUCTS
: LIABILITY LITIGATION
:
: CASE NO. 297
:
----- X

STIPULATION FOR VOLUNTARY DISMISSAL PURSUANT TO RULE 4:37-1(a)

This matter having been amicably resolved by and among the parties, it is hereby stipulated and agreed that the above-captioned action may be, and is hereby is, dismissed, with prejudice against all Defendants and without costs as to any party. The Complaint and all claims therein are being dismissed with prejudice pursuant to Rule 4:37-1(a).

PLAINTIFFS

DEFENDANTS

[Counsel]
[Firm]
[Address]
[Tel.]

[Counsel]
[Firm]
[Address]
[Tel.]

EXHIBIT E

MIRENA IUD SETTLEMENT PROGRAM CLAIM FORM

INSTRUCTIONS FOR ATTORNEYS

Claims packages, including a completed copy of this Claim Form, are to be uploaded by claimant's counsel to the firm ShareFile folder and submitted following these guidelines:

File format: Searchable pdf (Submission of non-searchable files will delay the review process)

File name: *lawfirm.claimantlastname.claimantfirstinitial.pdf*

Example: motleyrice.smith.j.pdf

No more than twenty-five (25) pages may be submitted in addition to this Claim Form. Acceptable proof of Mirena IUD use requires documentary evidence of Mirena IUD insertion and a perforation/non-perforation injury that is documented in a medical record. Only the insertion record, injury diagnosis, and removal record shall be included.

*****Failing to submit a completed claims package and/or submitting insufficient records to clearly identify elements necessary for eligibility will result in a claimant being assigned a lower injury category. Claimants who are incorrectly categorized as a result of incomplete or insufficient records will be required to appeal to Judge Corodemus for review, resulting in a cost for the time necessary for Judge Corodemus to review the appeal.*****

I. CLAIMANT INFORMATION (MIRENA PRODUCT USER)

Claimant Name	Last	First	Middle
Alternate Name(s)	Last	First	Middle
Social Security Number (SSN) XXX-XX-XXXX	Date of Birth MM/DD/YYYY		/ /
Address	Street	City, State	Zip code

II. PRIMARY COUNSEL INFORMATION

Firm Name	Attorney Name	Street Address / Suite	City, State Zip
E-mail for settlement information		Secondary email for settlement information	Phone

III. CASE INFORMATION

Case Status: <input type="checkbox"/> Filed <input type="checkbox"/> Unfiled	Current Case Number
Date Case Filed MM/DD/YYYY	/ /
Current Court/ Jurisdiction	

IV. INSERTION INFORMATION

Date Mirena Inserted* MM/DD/YYYY	/ /	*If there are additional insertion dates, please provide	/ / / /
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Ex. 1: To be correctly categorized, a complete medical record created at or about the time of the Mirena insertion must be included with this Claim Form and clearly labeled in the upper right-hand corner of the record as **Ex. 1**.

V. INJURY INFORMATION

Injury (Check One)	<input type="checkbox"/> Perforation <input type="checkbox"/> Embedment <input type="checkbox"/> Other: Please describe <input type="checkbox"/> None
------------------------------	--

Ex. 2: To be correctly categorized, a complete medical record created at or about the time of the injury checked above must be included with this Claim Form and clearly labeled in the upper right-hand corner of the record as **Ex. 2.**

Was the Mirena Removed? Yes No

If the Mirena IUD was NOT removed, and no documented medical reason explains why the Mirena IUD was not removed, Claimant must leave the rest of this section and Section VI. blank and skip down to Section VII. below.

Date of Mirena Removal** MM/DD/YYYY	/ /	State where removal of Mirena occurred	
---	-----	---	--

How was Mirena Removed? (Check One or Leave Blank)	<input type="checkbox"/> Open surgical removal (laparotomy) <input type="checkbox"/> Laparoscopic surgical removal <input type="checkbox"/> Hysteroscopic removal <input type="checkbox"/> Other: Please describe <input type="checkbox"/> Mirena was not removed due to documented medical reason**
--	--

**** If the Mirena was not removed due to a documented medical reason, please provide medical reason/ explanation**

Ex. 3: To be correctly categorized, a complete medical record created at or about the time of the removal surgery must be included with this Claim Form and clearly labeled in the upper right-hand corner of the record as **Ex. 3.**

**** If the Mirena was not removed due to a medical reason, to be correctly categorized, a complete medical record created at or about the time clearly stating that the Mirena could not be removed due to medical reasons must be included with this Claim Form and clearly labeled in the upper right-hand corner of the record as **Ex. 3.****

VI. EXTRAORDINARY INJURY FUND INFORMATION

Claimant is making an EIF claim Yes No

EIF Claims are Being Made For (Check All That Apply)	<input type="checkbox"/> A hysterectomy <input type="checkbox"/> A hospital stay in excess of 7 days <input type="checkbox"/> Medical expenses in excess of \$100,000.00
--	--

EIF: An additional 10 pages of supporting documentation may be submitted for each EIF claim made. To be eligible for EIF categorization, complete records created at or about the time of the EIF injury being claimed must be included with this Claim Form and clearly labeled in the upper right-hand corner of the record as **EIF.**

VII. CLAIMANT'S CERTIFICATION REGARDING BANKRUPTCY

Claimant certifies that she	<input type="checkbox"/> IS a party in a bankruptcy action either currently pending or which was pending at the time of the removal of her Mirena IUD in which she is seeking/ sought bankruptcy protection.
	<input type="checkbox"/> is NOT a party in a bankruptcy action either currently pending or which was pending at the time of the removal of her Mirena IUD in which she is seeking/ sought bankruptcy protection.

VIII. ATTORNEY'S DECLARATION AND SIGNATURE

I declare under penalty of perjury subject to 28 U.S.C. § 1746 that all of the information provided in this Claim Form is true and correct to the best of my knowledge, information, and belief.

Attorney's Signature		Date	/ /
Attorney's Printed Name		Firm Name	