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Attorneys for Defendants Ethicon, Inc. and Johnson & Johnson JUN 12 2025
GREGA, PADOVANO, JEG

KANDICE STOTTS, Deceased

Plaintiff,

VS.

ETHICON, INC., ET AL.,

SUPERIOR COURT OF NEW JERSEY LAW DIVISION – BERGEN COUNTY DOCKET NO. BER-L-007218-18 (MCL)

MASTER CASE NO. BER-L-011575-14

CIVIL ACTION

In Re Pelvic Mesh/Gynecare Litigation Case No. 291 CT

CONSENT ORDER GRANTING IN PART DEFENDANTS' MOTIONS TO DISMISS FOR FAILURE TO SUBSTITUTE AND TO STAY DEFENDANTS' EXPERT REPORT DEADLINE

Defendants.

THIS MATTER having been brought before the Court by Defendants Ethicon, Inc. and Johnson & Johnson, through its counsel Riker Danzig LLP, seeking an Order of Dismissal Without Prejudice under Rule 4:23-5(a)(1) that if, within 60 days of dismissal is not vacated, will automatically and without further application of Defendants, convert to a dismissal with prejudice under Rule 4:23-5(a)(2) and additionally, an Order staying Defendants' August 5, 2024, deadline to produce expert reports.; Plaintiff having submitted a partial opposition to the motion on July 10, 2024, and the parties having agreed to resolve the pending motions as follows,

IT IS on this \_\_\_\_\_\_day of \_\_\_\_\_\_, 2025, ORDERED that:

- 1. The matter is dismissed without prejudice;
- All deadlines in this matter are stayed pending further order of the Court should Plaintiff successfully reinstate;
- Defendants motions filed on March 13, 2024, and June 20, 2024, are withdrawn as moot per the terms of this Order;
- 4. This matter may be reinstated within the next 90 days otherwise this matter shall be deemed dismissed with prejudice without further order of the Court or action by the Defendants.

Hon. Gregg A. Padovano, J.S.C.

## CONSENTED TO AS TO FORM AND ENTRY:

Napoli Shkolnik, PLLC 360 Lexington Avenue, 11th Floor New York, NY 10017 Attorney for Plaintiff, Kandice Stotts RIKER DANZIG LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962
Attorney for Defendants,
Ethicon, Inc. and Johnson & Johnson

By: <u>/s/ Shayna E. Sacks <sup>1</sup></u> Shayna E. Sacks, Esq.

By: <u>/s/ Kelly S. Crawford</u><sup>1</sup> Kelly S. Crawford, Esq.

Dated: June 12, 2025

Dated: June 12, 2025

4915-1609-7356, v. 1

<sup>&</sup>lt;sup>1</sup> Pursuant to the New Jersey Supreme Court Omnibus Order on Covid-19 issues entered on March 27, 2020, "The provisions of Rule 1:32-2A(c) and all other Court Rules requiring original signatures on filings are relaxed and supplemented so as to permit electronic signatures to be used in all filing processes temporarily authorized to be used during COVID-19 crisis, including, but not limited to emergency applications, submitted by email and hardcopy submissions in dockets without an approved electronic filing system..."