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Attorneys for Defendants,
Ethicon, Inc. and Johnson and Johnson

DIANNA DOYLE,

Plaintiffs,

vs.

JOHNSON & JOHNSON and ETHICON,
INC.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – BERGEN COUNTY
DOCKET NO. BER-L- 005205-22

MASTER CASE NO. BER-L-11575-14

CIVIL ACTION

In Re Pelvic Mesh/Gynecare Litigation
Case No. 291

**COMMISSION FOR ISSUANCE OF
SUBPOENA *DUCES TECUM* IN THE
STATE OF TEXAS**

To the Honorable Judges of the State of Texas,

WHEREAS, it appears to this Court that the Texas Health and Human Services Commission located at **Custodian of Records-Litigation, Brown-Heatly Building, Mail Code 1070, 4900 North Lamar Boulevard, Austin, TX 78751**, is a material witness in this action because it possesses information and documents material to Plaintiff Dianna Doyle's alleged injuries and medical conditions, this Court now respectfully commissions and solicits the assistance of the Courts of the State of Texas, or such subordinate office as they may designate, to issue with due diligence to the Texas Health and Human Services Commission:

A Subpoena Duces Tecum, in a form acceptable to the Court Rules of the State of Texas, compelling the Texas Health and Human Services Commission to produce:

1. All communications between the Texas Health and Human Services Commission (hereinafter "THHSC") and Dianna Doyle (hereinafter "Plaintiff") or anyone affiliated with or representing Plaintiff.
2. All documents transmitted by THHSC to Plaintiff or anyone affiliated with or representing Plaintiff.
3. All documents transmitted by Plaintiff or anyone affiliated with or representing Plaintiff to THHSC.
4. All communications and documents pertaining to THHSC's assessment of the cost(s) associated with Plaintiff's surgical procedures.
5. All Medicaid claims pertaining to or relating to Plaintiff.
6. The names and contact information for any employee, agent, representative or proxy of THHSC that interacted with Plaintiff or anyone affiliated with or representing Plaintiff.
7. All documents that reflect in any way how much THHSC paid to Plaintiff.
8. All documents that reflect in any way any repayments to THHSC by Plaintiff.
9. All documents that reflect in any way the repayment amount owed to THHSC by Plaintiff.

6-5-25

Official Seal, Clerk
Superior Court of New Jersey



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

Michelle M. Smith, Esq.
Clerk of Superior Court