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FILED

MAY 09 2025

GREGG A. PADOVANO, J.S.C.

KIMBERLY SHOOP and
BRIAN SHOOP, w/h

Plaintiffs,

vs.

ETHICON, INC., ET AL.

Defendants.

:
:
: LAW DIVISION – BERGEN COUNTY
: DOCKET NO. BER-L-003377-24-MCL
: MASTER CASE NO. BER-L-11575-14
:

: Civil Action
: J & J Litigation, Case No. 291
:

: **CONSENT ORDER TO AMEND**
: **COMPLAINT**
:

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties,
that Plaintiff is hereby permitted to file a First Amended Complaint to remove Brian Shoop as a
party to the matter and amend the case caption, as identified in the attached as Exhibit "A."
Defendants are not required to file an Answer to this First Amended Complaint.

IT IS SO STIPULATED:

BY: /s/ Catelyn McDonough
Catelyn McDonough, Esq.
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130 N. 18TH STREET, STE 1600
ONE LOGAN SQUARE
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Attorney for Plaintiff

BY: /s/ Kari Sutherland
Kari L. Sutherland, Esq.
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Attorney for Defendants

Date: May 7, 2025


GREGG A. PADOVANO, J.S.C.

EXHIBIT “A”

Kila Baldwin, Esquire – NJ Bar ID # 027072002
Catelyn McDonough, Esquire – NJ Bar ID # 182202016
ANAPOL WEISS
One Logan Square
130 N 18th Street, Suite 1600
Philadelphia, PA 19103
(215) 735-1130

KIMBERLY SHOOP

Plaintiff,

vs.

ETHICON, INC., ETHICON WOMEN'S
HEALTH AND UROLOGY, a Division
of Ethicon, Inc., GYNECARE,
JOHNSON & JOHNSON, and
JOHN DOES 1-20,

Defendants.

:
:
: LAW DIVISION – BERGEN COUNTY
: DOCKET NO. BER-L-003377-24-MCL
: MASTER CASE NO. BER-L-11575-14
:

:
: Civil Action
: J & J Litigation, Case No. 291
:

: **FIRST AMENDED SHORT FORM**
: **COMPLAINT AND JURY DEMAND**
:
:
:
:
:
:

Plaintiff, Kimberly Shoop, complaining against Defendants, says 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 First Amended Short Form Complaint and Jury demand against 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 Minnesota.

3. Plaintiff brings this action:

 X 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. Plaintiff asserts that the following designated product was implanted into Kimberly Shoop causing injuries and damages:

_____ Prolene Mesh/Prolene Soft Mesh

_____ Gynemesh

_____ TVT

_____ TVT Abbrevio

_____ TVT Secur

_____ Prolift

 X TVT-O

_____ Prosima

_____ Other:

5. The product codes and lot numbers are as follows: TVT-O Lot #: 1282015,
Product #: 810081.

6. The aforesaid implantation of Pelvic Mesh Product(s) occurred on September 14, 2005, at Fairview Lakes Regional Health Care, 5200 Fairview Blvd. Wyoming, MN 55092.

7. Plaintiff adopts and incorporates by reference the applicable Causes of Action asserted against Defendants in the Master Long Form Complaint.

8. Plaintiff Kimberly Shoop has suffered and 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 products.

WHEREFORE, Plaintiff demands Judgment against 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

9. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as if set forth at length herein.

10. Plaintiff Kimberly Shoop has suffered and 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 products.

WHEREFORE, Plaintiff demands Judgment against 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

11. Plaintiff re-alleges and incorporate by reference each of the foregoing paragraphs as if set forth at length herein.

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

WHEREFORE, Plaintiff demands Judgment against 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 hereby demands a trial by jury.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Kila Baldwin, Esquire, is hereby designated as trial counsel.

ANAPOL WEISS
One Logan Square
130 North 18th Street, Suite 1600
Philadelphia, PA 19103

Attorney for Plaintiff

By: /s/ Kila Baldwin
KILA BALDWIN, ESQUIRE

Dated: May 7, 2025

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. BER-L-11575-14, 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.

/s/ Kila Baldwin

KILA BALDWIN, ESQUIRE

Dated: May 7, 2025