Cohen, Placitella & Roth, P.C.

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AUG 04 2025

GREGG A. PADOVANO, J.S.C.

MARION GORE AND RAYMOND GORE

Plaintiffs,

VS.

ETHICON, INC., ETHICON WOMEN'S HEALTH AND UROLOGY, a Division of Ethicon, Inc., GYNECARE, JOHNSON & JOHNSON, JOHN DOES 1-20 (fictitious), and JANE DOE CORPORATIONS 21-40 (fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION – BERGEN COUNTY

MASTER DOCKET NO. BER-L-11575-14

DOCKET NO. BER-L-11110-14

GYNECARE LITIGATION, CASE NO. 291

PROPOSED ORDER ADMITTING CHRISTINA M. BEHM, ESQUIRE PRO HAC VICE

THIS MATTER HAVING COME before the Court on application of Rachel A. Placitella, Esquire, attorney for Plaintiffs and the Court having reviewed the papers filed herein, and for good cause shown, namely that the matter involved a complex area of law and that Christina M. Behm, Esquire is a specialist,

IT IS on this \_\_\_\_\_ day of \_\_\_AUGU87, 2024, ORDERED as follows:

**THAT** Christina M. Behm, Esquire be hereby admitted *Pro Hac Vice* in the above captioned matter, pursuant to R.1:21-2; and

THAT Christina M. Behm, Esquire shall abide by the New Jersey Court Rules including all disciplinary rules; and

THAT Christina M. Behm, Esquire shall consent to the appointment of the Clerk of the Supreme Court as an agent upon whom service of process may be made for all actions against her firm that may arise out of her participation in this matter; and

THAT Christina M. Behm, Esquire shall notify the Court immediately of any matter affecting her standing at the bar of any other Court; and

THAT Christina M. Behm, Esquire shall have all pleadings, briefs and other papers filed with the Court signed by Rachel A. Placitella, Esquire, or another attorney of record who is authorized to practice in this State, and who shall be held responsible for them and the conduct of the cause and of attorney Christina M. Behm, Esquire; and

THAT Christina M. Behm, Esquire shall within ten (10) days of the date of this Order comply with R.1:20-1(b), R. 1:28B-1(e) and R.1:28-2 by paying the appropriate fees to the Oversight Committee, to the Lawyer's Assistance Fund and the New Jersey Lawyer's Fund for Client Protection no later than February 1st of each year thereafter and shall submit an affidavit of compliance; and

THAT Christina M. Behm, Esquire shall not be designated as trial counsel; and

THAT no adjournment or delay in discovery, motions, trial or any other proceeding will be requested by reason of Christina M. Behm, Esquire's inability to appear; and

THAT automatic termination of *Pro Hac Vice* admission of Christina M. Behm, Esquire shall occur for failure to make the required annual payment of the Annual Fee and the annual payment to the Lawyer's Assistance Fund and the New Jersey Lawyer's Fund for Client

Protection. Proof of such payment, after filing proof of the initial payment, shall be made no later than February of each year; and

THAT non-compliance with any of these requirements shall constitute grounds for removal; and

THAT a copy of this Order shall be served on all parties within seven (7) days of the date of this Order.

GREGGA. PADOVANO, J.S.C.

UNOPPOSED