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Plaintiff(s),	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION – ATLANTIC COUNTY
	:	DOCKET NO. ATL-L-
	:	MASTER CASE NO. L-6341-10-CT
	:	
vs.	:	Civil Action
	:	Gynecare Litigation, Case No. 291
ETHICON, INC., ETHICON WOMEN'S HEALTH AND UROLOGY, a Division of Ethicon, Inc., GYNECARE, JOHNSON & JOHNSON, AND JOHN DOES 1-20,	:	<b>MASTER SHORT FORM</b>
	:	<b>COMPLAINT AND JURY DEMAND</b>
	:	
Defendants.	:	
	:	

Plaintiff(s), \_\_\_\_\_, complaining against the  
 Defendants, say(s) 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 Short Form Complaint and Jury demand against the 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 \_\_\_\_\_.

3. Plaintiff brings this action [Check the applicable designation]:

\_\_\_\_\_ 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. Additionally, \_\_\_\_\_, is/are the [Check the applicable designation]:

\_\_\_\_\_ Spouse

\_\_\_\_\_ Child/Children

\_\_\_\_\_ Other (Set forth) \_\_\_\_\_

of \_\_\_\_\_, is/are a resident(s) of the State of \_\_\_\_\_, and is/are hereby named as an additional plaintiff(s), and claims damages.

5. Plaintiff asserts that the following designated product(s) was/were implanted into \_\_\_\_\_, causing injuries and damages [Check the applicable designation(s)]:

\_\_\_\_\_ Prolene Mesh/Prolene Soft Mesh

\_\_\_\_\_ Gynemesh

\_\_\_\_\_ TVT

\_\_\_\_\_ TVT-O

\_\_\_\_\_ TVT-S

\_\_\_\_\_ TVT Exact

\_\_\_\_\_ TVT Abbrevio

\_\_\_\_\_ Prolift

\_\_\_\_\_ Prolift +M

\_\_\_\_\_ Gynecare Pelvic Mesh Product(s), specific product name(s) unknown at present.

\_\_\_\_\_ Non-Gynecare Pelvic Mesh Product(s), known as \_\_\_\_\_.

6. The product code(s) and lot number(s) are as follows (if known):

\_\_\_\_\_

7. The aforesaid implantation of Pelvic Mesh Product(s) occurred on:

\_\_\_\_\_ [List all dates of implantation], at \_\_\_\_\_,

located in \_\_\_\_\_ [City], \_\_\_\_\_ [State].

8. Plaintiff(s) adopt and incorporate by reference the applicable Causes of Action asserted against the Defendants in the Master Long Form Complaint.

9. \_\_\_\_\_ has suffered/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 product(s).

10. The additional designated plaintiff(s) has suffered/have suffered/will continue to suffer loss of care, comfort, consortium, guidance, support, wrongful death damages, survivorship damages, and/or other losses and damages as a result of the implantation of the prior designated pelvic mesh product(s).

WHEREFORE, Plaintiff(s) demand Judgment against the 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** [If applicable]

1. Plaintiffs re-allege and incorporate by reference each of the foregoing paragraphs as if set forth at length herein.

2. Plaintiff(s) assert(s) the following additional Causes of Action against Defendant(s) [set forth the applicable Defendant(s), cause(s) of action and, where required by the New Jersey Rules of Court, supply the supporting facts and allegations with specificity]:

3. \_\_\_\_\_ has suffered/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 product(s).

4. The additional designated plaintiff(s) has suffered/have suffered/will continue to suffer loss of care, comfort, consortium, guidance, support, wrongful death damages, survivorship damages, and/or other losses and damages as a result of the implantation of the prior designated pelvic mesh product(s).

WHEREFORE, Plaintiff(s) demand Judgment against the 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**

1. Plaintiffs re-allege and incorporate by reference each of the foregoing paragraphs as if set forth at length herein.

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

WHEREFORE, Plaintiff(s) demand Judgment against the 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(s) hereby demand(s) a trial by jury.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:25-4, \_\_\_\_\_ is hereby designated as trial  
counsel.

\_\_\_\_\_  
Attorney for Plaintiff(s)

**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. L-6341-10-CT, 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.

\_\_\_\_\_  
Attorney for Plaintiff(s)