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Attorneys for Defendant C. R. Bard, Inc.

FILED
JUL 06 2020
RACHELLE L. HARZ
J.S.C.

IN RE PELVIC MESH/ BARD LITIGATION	SUPERIOR COURT OF NEW JERSEY LAW DIVISION – BERGEN COUNTY MASTER DOCKET NO. BER-L-17717-14 Civil Action **ORDER TO SHOW CAUSE REGARDING NON-COMPLIANCE WITH THE COURT'S FEBRUARY 28, 2020 ORDER TO PROVIDE UPDATED PLAINTIFF FACT SHEETS AND RELATED RECORDS**

THIS MATTER having come before the Court by Defendant C. R. Bard, Inc. through its counsel Melissa A. Geist, Esq., Reed Smith LLP, and

WHEREAS on February 28, 2020, the Court entered an Order requiring that counsel for plaintiffs identified in Schedule A attached to that Order to provide full, complete, and updated Plaintiff Fact Sheets, including signed certifications, updated authorizations to collect medical records, and all medical records relating to the implant and any explant procedure(s) to counsel for Defendant C. R. Bard, Inc., Melissa Geist, Esq. by April 30, 2020; and

WHEREAS the February 28, 2020 Order was served on Plaintiffs' Liaison Counsel, Adam Slater, Esq. and electronically served on counsel for Plaintiffs via Lexis Nexis File and Serve ("LNFS") on February 28, 2020; and

WHEREAS Liaison counsel for Plaintiffs and Liaison counsel for Defendant C. R. Bard conferred in March 2020 and agreed that C. R. Bard was not going to seek dismissals due to the

evolving COVID-19 pandemic and agreed that a reasonable extension was warranted under the circumstances; and

WHEREAS by letter dated May 7, 2020, the Court agreed to extend the deadline in the February 28, 2020 Order and ordered Plaintiffs identified in Schedule A to provide full, complete, and updated Plaintiff Fact Sheets, including signed certifications, updated authorizations to collect medical records, and all medical records relating to the implant and any explant procedure(s) by June 30, 2020; and

WHEREAS the May 7, 2020 letter was served on Plaintiffs' Liaison Counsel, Adam Slater, Esq. and electronically served on counsel for Plaintiffs via LNFS on May 7, 2020; and

WHEREAS the June 30, 2020 deadline to provide full, complete, and updated Plaintiff Fact Sheets, including signed certifications, updated authorizations to collect medical records, and all medical records relating to the implant and any explant procedure(s) has expired; and

WHEREAS the plaintiffs identified in this Order have not provided full, complete, and updated Plaintiff Fact Sheets, including signed certifications, updated authorizations to collect medical records, and all medical records relating to the implant and any explant procedure(s) to Melissa Geist, Esq.; and for good cause;

IT IS on this 6th **day of July, 2020 ORDERED** that counsel for plaintiffs identified below shall file a certification by **Friday, July 17, 2020** to show good cause to the satisfaction of the Court of why they did not comply with the prior Order and why Plaintiffs' complaints should not be dismissed with prejudice for failure to comply with the Court's February 28, 2020 Order and subsequent May 7, 2020 extension of time:

Plaintiff	Civil Action	PL Firm 1
Acton, Michelle	BER-L-008216-18	Napoli Shkolnik & Associates, PLLC - NY
Anderson, Patricia (OH)	BER-L-008217-18	Napoli Shkolnik & Associates, PLLC - NY
Andrade-Cleveland, Lidia	BER-L-008218-18	Napoli Shkolnik & Associates, PLLC - NY
Ard, Nikolle S.	BER-L-005236-15	Aylstock, Witkin, Kreis & Overholtz, PLLC
Atkins, Janet	BER-L-008220-18	Napoli Shkolnik & Associates, PLLC - NY
Bertschy, Cathy	BER-L-008224-18	Napoli Shkolnik & Associates, PLLC - NY
Beruvides, Maria Cruz	BER-L-017999-14	Orlando Firm, PC
Bonocora, Mary	BER-L-002626-15	Bernstein Liebhard LLP
Bordner, Rose	BER-L-019038-14	Napoli Shkolnik & Associates, PLLC - NY
Bravo, Maria Magdalena	BER-L-018097-14	Law Offices of Jan Meyer & Associates, PC
Burke, Kathleen A	BER-L-008225-18	Napoli Shkolnik & Associates, PLLC - NY
Burnette, Barbara	BER-L-008226-18	Napoli Shkolnik & Associates, PLLC - NY
Carlson, Beverly A	BER-L-008228-18	Napoli Shkolnik & Associates, PLLC - NY
Cilley, Deborah	BER-L-018197-14	Napoli Shkolnik & Associates, PLLC - NY
Cipriani, Kim M	BER-L-018523-14	Orlando Firm, PC
Collins, Sharon Earls (TN)	BER-L-018289-14	Pro se
Colman, Christina L	BER-L-008231-18	Napoli Shkolnik & Associates, PLLC - NY
Cunningham, Jessica	BER-L-016635-14	Bernstein Liebhard LLP
Curran, Suzanne	BER-L-008233-18	Napoli Shkolnik & Associates, PLLC - NY
Davis, Cindy	BER-L-018481-14	Pro se

Fears, Catherine	BER-L-008247-18	Napoli Shkolnik & Associates, PLLC - NY
Gonteski, Julia	BER-L-018306-14	Levy, Baldante, Finney & Rubenstein, PC
Gordon, Bertina	BER-L-008253-18	Napoli Shkolnik & Associates, PLLC - NY
Gray, Dawn-Marie	BER-L-005227-15	Aylstock, Witkin, Kreis & Overholtz, PLLC
Gray, Joyce	BER-L-002951-17	Seeger Weiss LLP - Newark, NJ
Hagensicker, Mary	BER-L-008255-18	Napoli Shkolnik & Associates, PLLC - NY
Heiberg, Jodie Leigh	BER-L-001476-15	Bernstein Liebhard LLP
Hopkins, Deborah Hood	BER-L-008260-18	Napoli Shkolnik & Associates, PLLC - NY
Hurshman, Sherrie	BER-L-008263-18	Napoli Shkolnik & Associates, PLLC - NY
Hutchins, Nancy	BER-L-017661-14	Napoli Shkolnik & Associates, PLLC - NY
Johnson, Crystal	BER-L-008299-18	Napoli Shkolnik & Associates, PLLC - NY
Josey, Willena B	BER-L-008301-18	Napoli Shkolnik & Associates, PLLC - NY
Klindera, Marjorie	BER-L-008304-18	Napoli Shkolnik & Associates, PLLC - NY
Kush, Kristen	BER-L-019037-14	Napoli Shkolnik & Associates, PLLC - NY
Laurino, Louise	BER-L-008309-18	Napoli Shkolnik & Associates, PLLC - NY
Lewis, Beverly A	BER-L-007558-15	Aylstock, Witkin, Kreis & Overholtz, PLLC
Lynn, Judith R	BER-L-008311-18	Napoli Shkolnik & Associates, PLLC - NY
Maloney, Elizabeth	BER-L-018517-14	Napoli Shkolnik & Associates, PLLC - NY
Markoz, Rejina	BER-L-008312-18	Napoli Shkolnik & Associates, PLLC - NY
Marsh, Elizabeth	BER-L-019026-14	Pro se
Martinez, Peggy	BER-L-008314-18	Napoli Shkolnik & Associates, PLLC - NY

McKenzie, Carol Jean Parsons	BER-L-017751-14	Orlando Firm, PC
Messick, Connie	BER-L-018398-14	D'Onofrio Firm, LLC
Mommeny, Emilie	BER-L-002613-15	Seeger Weiss LLP - New York, NY
Moore, Kimberly (MO)	BER-L-008318-18	Napoli Shkolnik & Associates, PLLC - NY
Myers, Cathy	BER-L-008320-18	Napoli Shkolnik & Associates, PLLC - NY
Nelson, Heather Michelle	BER-L-008324-18	Napoli Shkolnik & Associates, PLLC - NY
Nice, Evelyn	BER-L-008325-18	Napoli Shkolnik & Associates, PLLC - NY
Pete, Patricia	BER-L-008327-18	Napoli Shkolnik & Associates, PLLC - NY
Phillips, Lora	BER-L-018528-14	Lynch Daskal Emery LLP
Pierce-Parment, Donna	BER-L-006640-19	Feldman Pinto, LLC
Probst, Theresa	BER-L-008329-18	Napoli Shkolnik & Associates, PLLC - NY
Puntiel, Delsia	BER-L-002627-15	Seeger Weiss LLP - New York, NY
Ringer, Regina	BER-L-018518-14	Napoli Shkolnik & Associates, PLLC - NY
Rogers, Kathleen	BER-L-008333-18	Napoli Shkolnik & Associates, PLLC - NY
Serrano, Hilda	BER-L-008334-18	Napoli Shkolnik & Associates, PLLC - NY
Simmons, Tamara	BER-L-008336-18	Napoli Shkolnik & Associates, PLLC - NY
Smith, Norma (SC)	BER-L-017707-14	Napoli Shkolnik & Associates, PLLC - NY
Smith, Shannon White (NC)	BER-L-018106-14	Lynch Daskal Emery LLP
Sterling, Sondra	BER-L-017763-14	Napoli Shkolnik & Associates, PLLC - NY
Terry, Kimberly (KY)	BER-L-008339-18	Napoli Shkolnik & Associates, PLLC - NY
Tindle, Betty Sue	BER-L-018670-14	Law Offices of Jan Meyer & Associates, PC

Trejo, Elida	BER-L-008340-18	Napoli Shkolnik & Associates, PLLC - NY
Valenti-Acosta, Margaret	BER-L-017965-14	Koppenaal Law Offices
Watts, Cynthia	BER-L-017697-14	Wexler Wallace, LLP
Wilson, Briana	BER-L-017489-14	Napoli Shkolnik & Associates, PLLC - NY

IT IS FURTHER ORDERED that plaintiffs identified above shall also serve via email a copy of their good cause certification and full, complete, and updated Plaintiff Fact Sheets, including signed certifications, updated authorizations to collect medical records, and all medical records relating to the implant and any explant procedure(s) as stated above upon counsel for Defendant, Melissa Geist, Esq. by **Friday, July 17, 2020;** and

IT IS FURTHER ORDERED that a true copy of this Order shall be served immediately upon Plaintiffs' liaison counsel, Adam M. Slater, Esq. and upon all counsel of record via LNFS within five (5) days of receipt of this Order.

HONORABLE RACHELLE L. HARZ, J.S.C.