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**FILED**  
**MAR 18 2024**  
**GREGG A. PADOVANO, J.S.C.**

*Counsel for Plaintiffs*

<p><b>MAUREEN FLAHERTY and EDWARD FLAHERTY,</b></p> <p style="text-align: right;"><b>Plaintiffs,</b></p> <p style="text-align: center;"><b>vs.</b></p> <p><b>ETHICON, INC., ETHICON WOMEN'S HEALTH AND UROLOGY, a Division of Ethicon, Inc., GYNECARE, JOHNSON &amp; JOHNSON, and JOHN DOES 1-20,</b></p> <p style="text-align: right;"><b>Defendants.</b></p>	<p><b>SUPERIOR COURT OF NEW JERSEY LAW DIVISION: BERGEN COUNTY</b></p> <p><b>DOCKET NO. BER-L-6959-19 MCL</b></p> <p style="text-align: center;"><b>CIVIL ACTION</b> <b>In Re Pelvic Mesh/Gynecare Litigation</b> <b>Case No: 291</b></p> <p style="text-align: center;"><b>ORDER</b></p>
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**THIS MATTER**, having been opened to the Court upon application of Anapol Weiss, Counsel for Plaintiffs in the above-referenced matter, and the Court having reviewed the moving papers and any submissions by the parties, for the issuance of a commission requesting the Superior Court, Norfolk County, Commonwealth of Massachusetts, to direct the Clerk of Court to issue a subpoena duces tecum and ad testificandum in connection with Gerry Campos, M.D., to provide sworn testimony at deposition, and for good cause having been shown for the entry of issuance of a Commission authorizing the issuance of a deposition subpoena and the production of documents in this matter;

IT IS, on this 18<sup>TH</sup> day of MARCH, 2023;

**ORDERED** that Plaintiffs' request for the issuance of a Commission for the deposition and collection of records from Gerry Campos, M.D., is hereby granted; and it is further

**ORDERED** that this Court hereby authorizes the issuance of, and hereby issues, its Commission, pursuant to Rule 4:11-5, in the form annexed hereto for the taking of the deposition, at the time and place of the depositions, and for the production of any and all documents relating to any of the subjects listed on the Schedule A, annexed to the Commission; and it is further

**ORDERED** that the Clerk of the Superior Court of New Jersey, Bergen County to affix the proper seal to said Commission; and it is further

**ORDERED** that this Court respectfully requests that the Superior Court, Norfolk County, Commonwealth of Massachusetts, directs the Clerk of that Court to issue a subpoena duces tecum and ad testificandum and issue any appropriate process in aid of such Commission; and it is further

**ORDERED** that a true copy of this Order be forwarded to all counsel of record within seven (7) days of the date hereof.

By:   
HONORABLE GREGG A. PADOVANO, J.S.C.

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*Counsel for Plaintiffs*

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TO: Anapol Weiss  
One Logan Square  
130 N 18<sup>th</sup> Street, Suite 1600  
Philadelphia, PA 19103

OR

Any Person By Whom Depositions  
May Be Taken Pursuant to the Rules of Practice of  
The Commonwealth of Massachusetts

**THIS MATTER** has been opened to the Court upon application by the law firm of Anapol Weiss, Counsel for Plaintiffs in the above-referenced matter, pursuant to Rule 4:11-5. Plaintiffs have demonstrated the need for certain information to be produced in connection with the matter herein; that such information and all documents which record, reflect or relate to any of those subjects requested by Plaintiffs are proper subjects of discovery in this action, and that attendance by Gerry Campos, M.D., at the deposition and production of the requested documents by same may not be compelled without this Court's issuance of this commission. In the jurisdiction of the Superior Court of New Jersey, through the undersigned Judge, Plaintiffs hereby respectfully commission and solicit the assistance of the Superior Court, Norfolk County, Commonwealth of Massachusetts, or such subordinate office as it may designate, in issuing an order directing the Clerk of that Court to issue a subpoena duces tecum and ad testificandum or other appropriate orders of process in aid of such commission;

**NOW, THEREFORE**, in confidence of your prudence and fidelity, we hereby appoint you Commissioner to serve a subpoena duces tecum and ad testificandum, for the deposition upon oral examination to be taken before you, and for the documents in the possession of Gerry Campos, M.D., including but not limited to, any and all communications, documents, or information which record, reflect, refer, or relate to any of the subjects listed on the annexed Schedule A, at a time and place to be determined; and

**IN THE DISCHARGE OF THIS COMMISSION** you are hereby authorized and empowered, at a time and place in Weymouth, Massachusetts, designated by you or such other times and places as shall be mutually agreed upon by the witnesses and parties to this action, to permit the parties to inspect and copy the documents to be produced by Gerry Campos, M.D., and to put the witness on oath, record, and transcribe the testimony of the witness on a date to be

mutually agreed upon by the witness and the parties to this action, to certify on the deposition that the witness was duly sworn by you and the deposition is a true record of the witness' testimony and seal the deposition in an envelope endorsed with the title of this action and marked "Deposition of Gerry Campos, M.D., Weymouth, Massachusetts" and file it by mail with the Clerk of the Superior Court of New Jersey, Law Division, Bergen County, 10 Main Street, Hackensack, New Jersey 07601, or as may be otherwise agreed by the parties of this action.

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Clerk of the Superior Court of New Jersey

Dated: \_\_\_\_\_

**ENTER SEAL OF BERGEN COUNTY**

**SCHEDULE A**  
**DOCUMENTS TO BE PRODUCED BY GERRY CAMPOS, M.D.**

Pursuant to the New Jersey Rules of Civil Procedure, the deponent is requested to produce for inspection and/or copying at the time of the deposition the following materials that are in deponent's possession, custody, or control.

1. Deponent's complete set of medical records for Maureen Flaherty, DOB: 3/24/67, including billing records;

2. Any and all correspondence, memoranda, or written documentation of any kind referring or relating whatsoever to Maureen Flaherty, including but not limited to her transvaginal mesh implants, her medical care, her revision/mesh removal procedures and/or her complications from her transvaginal mesh implants;

3. Any and all videos or other recordings of any surgeries or revision procedures performed on Maureen Flaherty;

4. Deponent's current *Curriculum Vitae*;

5. Any and all contracts or agreements for services between you and/or South Shore Medical Center and Johnson & Johnson, Ethicon, or Gynecare at any time.

6. Any and all correspondence, electronic communication or any other communications in any form between you or any other physician at South Shore Medical Center and any agent of Johnson & Johnson, Ethicon or Gynecare at any time referring or relating whatsoever to transvaginal mesh implants.

7. Any and all evidence of payments received by you, South Shore Medical Center, or any other physician at South Shore Medical Center from Johnson & Johnson, Ethicon, and/or Gynecare at any time.



8. Any and all records maintained regarding complication rates seen by deponent with TVT transvaginal mesh implant;

9. Any and all records or written documentation maintained by you or in your possession regarding complication rates seen by South Shore Medical Center with TVT transvaginal mesh implant;

10. Any and all communications, correspondence, electronic correspondence or other written documents referring or relating whatsoever to requests 8 and 9 *supra*;

11. Any and all manuscripts, publications, memoranda or other written documents prepared by deponent and/or South Shore Medical Center referring or relating to transvaginal mesh implants whatsoever;

12. Any documents in the deponent's possession related to Ethicon, Inc., Ethicon Women's, Health and Urology, A Division, Of Ethicon, Inc., Gynecare, and Johnson & Johnson, Inc.'s transvaginal mesh products;

13. Any and all records of training sessions, proctorships, educational programs, promotional programs, presentations, poster boards referring or relating whatsoever to the TVT transvaginal mesh implant;

14. Any and all handouts, documents, pamphlets, advertisements, brochures, or other materials that are currently, or were ever previously, given to patients at South Shore Medical Center concerning mesh treatment for Stress Urinary Incontinence (SUI) and/or Pelvic Organ Prolapse (POP).