

Kelly S. Crawford, Esq. – ID #029141993
RIKER, DANZIG, SCHERER, HYLAND & PERRETTI, LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, NJ 07962
(973) 538-0800

Attorneys for Defendants,
Ethicon, Inc. and Johnson & Johnson

FILED

FEB 07 2022

**RACHELLE L. HARRIS
J.S.C.**

IN RE: PELVIC MESH/GYNECARE
LITIGATION

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – BERGEN COUNTY

Case No. 291
MASTER DOCKET NO. BER-L-011575-14
CIVIL ACTION

**NOTICE AND REQUEST
TO STAY
(OSHMANN – SECOND)**

The parties would like to advise the Court that a settlement in principle has been reached in the cases listed on Schedule A, attached.

It will likely take several months before the settlement will be finalized. As a result, the parties jointly request that the cases listed on the attached Schedule A be moved to inactive status and/or that any deadlines and other requirements be stayed, until such time as the settlement can be concluded and the cases can be dismissed with prejudice.

In the event the settlement is not finalized, the parties will promptly inform Your Honor so that any such case can be restored to the active docket of this Court.

IT IS on this 7th day of February, 2022, **ORDERED** as follows:

Any deadlines and proceedings in the cases listed on the attached Schedule A, including, but not limited to those established in CMO 74 and the TVT-O Pre-Trial Scheduling Order (Tenth Amended), are stayed pending further order of the Court. A copy of this Order shall be entered on the Master Case docket as well as in the dockets for the cases listed on the attached Schedule A.



RACHELLE L. HARZ, J.S.C.

THE UNDERSIGNED CONSENT TO THE FORM AND ENTRY OF THIS ORDER:

Theodore Oshman
Oshman & Mirisola, LLP
190 Christopher Columbus Dr.,
Suite 5B
Jersey, City, NJ 07302
tedo@oshmanlaw.com

*Attorneys for Plaintiffs Listed
on Schedule A*

By: /s/ Theodore Oshman¹
Theodore Oshman

Dated: February 4, 2022

Kelly S. Crawford
RIKER, DANZIG, SCHERER, HYLAND
& PERRETTI, LLP

*Attorneys for Defendants, Ethicon, Inc.
and Johnson & Johnson*

By: /s/ Kelly S. Crawford¹
Kelly S. Crawford

Dated: February 4, 2022

¹ Pursuant to the New Jersey Supreme Court Omnibus Order on Covid-19 issues entered on March 27, 2020, " The provisions of Rule 1:32-2A(c) and all other Court Rules requiring original signatures on filings are relaxed and supplemented so as to permit electronic signatures to be used in all filing processes temporarily authorized to be used during the COVID-19 crisis, including, but not limited to emergent applications submitted by email and hardcopy submissions in dockets without an approved electronic filing system... ."

SCHEDULE A

Docket Number	Matter Name	Plaintiff's Attorney
BER-L-012510-14	Cagle, Starlett Renee v. Ethicon Inc.	Hecht Kleeger;
BER-L-010326-14	Ketchum, Dawn	Hecht Kleeger
BER-L-010325-14	Brown, Erica	Hecht Kleeger
BER-L-010217-14	Robbins, Patricia Anne	Hecht Kleeger;
BER-L-004748-16	Burgos, Cynthia	Hecht Kleeger;