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FILED

FEB 15 2023

**RACHELLE L. HARZ
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**

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 15th day of February, 2023, **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 84, 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:

Margaret Elizabeth Cordner
Marc J. Bern & Partners LLP
60 E 42nd Street #950
New York, NY 10165
mcordner@bernllp.com

*Attorneys for Plaintiffs Listed
on Schedule A*

By: /s/Margaret E. Cordner
Margaret E. Cordner

Dated: February 13, 2023

Kelly S. Crawford
RIKER DANZIG LLP

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

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

Dated: February 13, 2023

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-10428-14	Brito, Maria	Marc J. Bern & Partners LLP
BER-L-10472-14	Cushman, Marylisa	Marc J. Bern & Partners LLP

The cases listed below are also the subject of an agreement in principle to settle, but neither case was identified for active case work up under CMO 84. Nevertheless, the cases listed below should also be stayed pending the ability to submit dismissal documents.

Docket Number	Matter Name	Plaintiff's Attorney
BER-L- 015335-14	Rivera, Claudia	Marc J. Bern & Partners LLP
BER-L- 012160-14	Napper, Debra	Marc J. Bern & Partners LLP