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FILED

MAY 31 2022

**RACHELLE L. HARZ
J.S.C.**

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

CATHY PELICAN,

Plaintiff,

vs.

ETHICON, INC., ETHICON WOMEN'S
HEALTH AND UROLOGY, a Division
of Ethicon, Inc., GYNECARE,
JOHNSON & JOHNSON,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION – BERGEN COUNTY
DOCKET NO. BER-L-08062-20-MCL

MASTER DOCKET NO. BER-L-011575-14

CIVIL ACTION
In Re Pelvic Mesh/Gynecare Litigation
Case No. 291

NOTICE AND REQUEST TO STAY

The parties would like to advise the Court that a settlement in principle has been reached in this case as part of larger global settlement in principle involving multiple plaintiffs.

It will likely take several months before the settlement will be finalized. As a result, the parties jointly request that this case 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, and that the pending

motion for summary judgment filed by Defendants currently scheduled for oral argument on June 30, 2022, ^{and motion to Amend the Complaint filed by Plaintiff} be withdrawn.

In the event the global 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 31st day of May, 2022, **ORDERED** as follows:

Any deadlines and proceedings in this case are stayed pending further order of the Court and the pending motion for summary judgment is withdrawn without prejudice. A copy of this Order shall be entered on the Master Case docket as well as in this matter's docket.


RACHELLE L. HARZ, J.S.C.

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

Michael Andrew Galpern
JAVERBAUM WURGAFT HICKS KAHN
WIKSTROM & SININS; P.C.
Attorneys for Plaintiff Cathy Pelican

Kelly S. Crawford
RIKER, DANZIG, SCHERER, HYLAND
& PERRETTI, LLP
*Attorneys for Defendants, Ethicon, Inc.
and Johnson & Johnson*

By: /s/Michael A. Galpern¹
Michael Andrew Galpern

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

Dated: May 27, 2022

Dated: May 23, 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... ."