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FILED

MAR 15 2024

GREGG A. PADOVANO, J.S.C.

IN RE: GYNECARE (SCHEDULE A ATTACHED)

Plaintiffs,

VS.

ETHICON, INC., ETHICON WOMEN'S HEALTH AND UROLOGY, a Division of Ethicon, Inc., GYNECARE, JOHNSON & JOHNSON, JOHN DOES 1-20 (fictitious), and JANE DOE CORPORATIONS 21-40 (fictitious),

Defendants.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION – BERGEN COUNTY

MASTER DOCKET NO. BER-L-11575-14

GYNECARE LITIGATION, CASE NO. 291

PROPOSED ORDER ADMITTING DAVID TODD MATHEWS, ESQUIRE PRO HAC VICE

THIS MATTER HAVING COME before the Court on application of Rachel A. Placitella, Esquire, attorneys for Plaintiffs and the Court having reviewed the papers filed herein, and for good cause shown, namely that the matter involved a complex area of law and that David Todd Mathews, Esquire is a specialist,

IT IS on this day of MARCN, 2024, ORDERED as follows:

**THAT** David Todd Mathews, Esquire be hereby admitted *Pro Hac Vice* in the above captioned matters (Schedule A attached hereto), pursuant to R.1:21-2; and

**THAT** David Todd Mathews, Esquire shall abide by the New Jersey Court Rules including all disciplinary rules; and

**THAT** David Todd Mathews, Esquire shall consent to the appointment of the Clerk of the Supreme Court as an agent upon whom service of process may be made for all actions against his firm that may arise out of his participation in this matter; and

**THAT** David Todd Mathews, Esquire shall notify the Court immediately of any matter affecting his standing at the bar of any other Court; and

THAT David Todd Mathews, Esquire shall have all pleadings, briefs and other papers filed with the Court signed by Rachel A. Placitella, or another attorney of record who is authorized to practice in this State, and who shall be held responsible for them and the conduct of the cause and of attorney David Todd Mathews, Esquire; and

THAT David Todd Mathews, Esquire shall within ten (10) days of the date of this Order comply with R.1:20-1(b), R. 1:28B-1(e) and R.1:28-2 by paying the appropriate fees to the Oversight Committee, to the Lawyer's Assistance Fund and the New Jersey Lawyer's Fund for Client Protection no later than February 1st of each year thereafter and shall submit an affidavit of compliance; and

THAT David Todd Mathews, Esquire shall not be designated as trial counsel; and

**THAT** no adjournment or delay in discovery, motions, trial or any other proceeding will be requested by reason of David Todd Mathews, Esquire's inability to appear; and

THAT automatic termination of *Pro Hac Vice* admission of David Todd Mathews, Esquire shall occur for failure to make the required annual payment of the Annual Fee and the annual payment to the Lawyer's Assistance Fund and the New Jersey Lawyer's Fund for Client

Protection. Proof of such payment, after filing proof of the initial payment, shall be made no later than February of each year; and

THAT non-compliance with any of these requirements shall constitute grounds for removal; and

**THAT** a copy of this Order shall be served on all parties within seven (7) days of the date of this Order.

J.S.C.

ØREGG A. PADOVANO, J.S.C.

UNOPPOSED

## SCHEDULE A

Viola Bible, et al. v. Ethicon, Inc., et al. – BER-L-6845-22

Elizabeth Pons. et al. v. Ethicon, Inc., et al. – BER-L-467-23

Kathy McCabe, et al. v. Ethicon, Inc., et al. – BER-L-80-23 – Previous Pro Hac Order Entered

Vicki Sue Godsey, et al. v. Ethicon, Inc., et al. – BER-L-4309-23

Lisa Stone, et al. v. Ethicon, Inc., et al. – BER-L-5720-23

Lori Schultz, et al. v. Ethicon, Inc., et al. – BER-L-4310-23