

LOCKS LAW FIRM, LLC

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FILED**MAR 10 2022****JOHN C. PORTO, J.S.C.**

**IN RE PROCEED MESH LITIGATION
 (PROCEED SURGICAL MESH AND
 PROCEED VENTRAL PATCH HERNIA
 MESH)**

DIANA CONTI and ROBERT CONTI,

Plaintiffs,

v.

JOHNSON & JOHNSON and
 ETHICON, INC.,

Defendants.

Master Docket No.: ATL-L-0794-19
 MCL CASE No. 630

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION
 ATLANTIC COUNTY

DOCKET NO.: ATL-L-2750-19

CIVIL ACTION

**ORDER FOR COMMISSION FOR
 ISSUANCE OF SUBPOENA AD
 TESTIFICADUM AND COMMISSION FOR
 ISSUANCE OF SUBPOENA DUCES TECUM
 TO DR. PAUL A. RUGGIERI, M.D., IN THE
 COMMONWEALTH OF MASSACHUSETTS**

THIS MATTER having been brought before this Court by Plaintiffs, Diana Conti and Robert Conti, through its counsel LOCKS LAW FIRM, LLC, pursuant to R. 4:11-5, seeking an Order for Commission for Issuance of a Subpoena *Ad Testificadum* and Subpoena *Duces Tecum* in accordance with the Massachusetts Rules of Civil Procedure to facilitate a taking of the deposition of **Dr. Paul A. Ruggieri, M.D.**, a resident of the Commonwealth of Massachusetts, located at Steward Surgical Specialists, 289 Pleasant Street, Fall River, MA 02721:

IT IS on this 10th March of 2022; 849

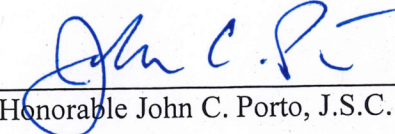
ORDERED:

1. That Golkow Litigation Services, One Boston Place, 201 Washington Street Suite 2600, Boston, Massachusetts 02108 or its designated agent is appointed as Commissioner in this

matter for the taking of the deposition of **Dr. Paul A. Ruggieri, M.D.**, a resident of the Commonwealth of Massachusetts, who is a material witness in this action because he possesses information and documents material to the above-captioned matter.

2. That any notary public or justice of the peace of the Commonwealth of Massachusetts is hereby authorized to issue a subpoena in accordance with Mass. R. Civ. P. 30 and 30A, to require **Dr. Paul A. Ruggieri, M.D.**, to appear for an in-person deposition on April 26, 2022 at 10:00 A.M, at the Waypoint Event Center, located at 185 MacArthur Drive, New Bedford, MA 02740, and produce specific records in his possession or control, as will be outlined by Plaintiffs.
3. That a Commission for issuance of Subpoena *Ad Testificandum* and Subpoena *Duces Tecum* to Paul Ruggieri, M.D., in the Commonwealth of Massachusetts, shall immediately issue, and the Clerk of the Court shall cause the proper seal to be affixed to the Commission.

IT IS FURTHER ORDERED that a copy of this Order be served upon all counsel of record within 5 days of the date hereof.



Honorable John C. Porto, J.S.C.

Dated: 3/10/22, 2022