



## **FIRST COUNT**

1. Ethicon adopts and incorporates by reference the entirety of its Amended Master Answer and Defenses. Ethicon denies that Plaintiffs are entitled to any relief from Ethicon.

2. Ethicon is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 2 of Plaintiffs' Complaint and, therefore, denies same.

3. Ethicon is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 3 of Plaintiffs' Complaint and, therefore, denies same.

4. Ethicon is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 4 of Plaintiffs' Complaint and, therefore, denies same.

5. Ethicon is without knowledge or information sufficient to form a belief as to the truth of Plaintiffs' allegations regarding which product, if any, was allegedly implanted into Plaintiff. Ethicon denies that Plaintiffs are entitled to any relief from Ethicon.

6. Ethicon is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 6 of Plaintiffs' Complaint and, therefore, denies same.

7. Ethicon is without knowledge or information sufficient to form a belief as to the truth of the allegations of Paragraph 7 of Plaintiffs' Complaint and, therefore, denies same.

8. Ethicon denies the Causes of Action set forth in the Master Long Form Complaint and adopts and incorporates by reference the entirety of its Amended Master Answer and Defenses.

9. Ethicon denies the allegations in Paragraph 9 of Plaintiffs' Complaint.

10. Ethicon denies the allegations in Paragraph 10 of Plaintiffs' Complaint and denies that Plaintiffs are entitled to any damages or relief whatsoever, including, but not limited to, that relief requested in the paragraph beginning "WHEREFORE" following Paragraph 10 of the First Count of Plaintiffs' Complaint.

### **SECOND COUNT**

1. Ethicon repeats and realleges its responses to all allegations contained in all paragraphs above as if fully set forth herein.

2. Ethicon denies the allegations in Paragraph 2 of the Second Count of Plaintiffs' Complaint.

3. Ethicon denies the allegations in Paragraph 3 of the Second Count of Plaintiffs' Complaint.

4. Ethicon denies the allegations in Paragraph 4 of the Second Count of Plaintiffs' Complaint and denies that Plaintiffs are entitled to any damages or relief whatsoever, including, but not limited to, that relief requested in the paragraph

beginning “WHEREFORE” following Paragraph 4 of the Second Count of Plaintiffs’ Complaint.

### **THIRD COUNT**

1. Ethicon repeats and realleges its responses to all allegations contained in all paragraphs above as if fully set forth herein.

2. Ethicon makes no answer to the allegations in Paragraph 2 of the Third Count of Plaintiffs’ Complaint, which appear to be directed to other parties. To the extent that Paragraph 2 of the Third Count may be deemed to contain factual allegations against Ethicon, Ethicon denies those allegations and denies that Plaintiffs are entitled to any damages or relief whatsoever, including, but not limited to, that relief requested in the paragraph beginning “WHEREFORE” following Paragraph 2 of the Third Count of Plaintiffs’ Complaint.

### **SEPARATE DEFENSES**

Ethicon adopts and incorporates by reference each and every separate defense set forth in its Amended Master Answer. In accordance with Case Management Order No. 3, Ethicon reserves its rights to assert case-specific defenses at a later time to be determined by the Court.

### **DEMAND FOR TRIAL BY JURY**

Ethicon demands a trial by jury of twelve of all claims triable as of right by jury.

WHEREFORE, Ethicon denies that it is liable to the Plaintiffs for damages or any other relief and demands judgment in its favor and against Plaintiffs, together with costs of suit.

Of Counsel:

By: \_\_\_\_\_

*Attorneys for Defendants*

Dated:

**CERTIFICATION OF SERVICE**

I certify that on this date I caused the attached Answer and Jury Demand of Defendants Ethicon, Inc. and Ethicon Women’s Health & Urology to be served by LexisNexis File & Serve upon all counsel of record, including Plaintiffs’ Co-Liaison Counsel:

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*Plaintiffs’ Co-Liaison Counsel*

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Dated: