

Attorneys for Defendants

,

Plaintiffs,

vs.

ETHICON, INC., ETHICON WOMEN'S
HEALTH AND UROLOGY, a Division of
Ethicon, Inc., GYNECARE, JOHNSON &
JOHNSON, AND JOHN DOES 1-20,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, ATLANTIC COUNTY
DOCKET NO. ATL-L-XXXX-XX

CIVIL ACTION

Gynecare Litigation, Case No. 291

**SHORT FORM ANSWER TO COMPLAINT
AND JURY DEMAND OF
DEFENDANT JOHNSON & JOHNSON**

Defendant Johnson & Johnson, in answer to Plaintiffs' Individual Short Form Complaint ("Complaint"), states as follows. In accordance with the procedures set forth in Case Management Order No. 3, Johnson & Johnson's answers are set forth herein as if Plaintiffs' complaint filed in this action conforms to the Master Short Form Complaint. [this last sentence only applies if plaintiffs filed a regular (not short form) complaint]

FIRST COUNT

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

2. Johnson & Johnson 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. Johnson & Johnson 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. Johnson & Johnson 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. Johnson & Johnson 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. Johnson & Johnson denies that Plaintiffs are entitled to any relief whatsoever from Johnson & Johnson. Johnson & Johnson further states that it does not manufacture, market, distribute or sell any products.

6. Johnson & Johnson 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. Johnson & Johnson 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. Johnson & Johnson 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. Johnson & Johnson denies the allegations in Paragraph 9 of Plaintiffs' Complaint.

10. Johnson & Johnson 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. Johnson & Johnson repeats and realleges its responses to all allegations contained in all paragraphs above as if fully set forth herein.

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

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

4. Johnson & Johnson 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. Johnson & Johnson repeats and realleges its responses to all allegations contained in all paragraphs above as if fully set forth herein.

2. Johnson & Johnson 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 Johnson & Johnson, Johnson & Johnson 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

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

DEMAND FOR TRIAL BY JURY

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

WHEREFORE, Johnson & Johnson 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:

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By: _____

Attorneys for Defendants

Dated:

CERTIFICATION OF SERVICE

I certify that on this date I caused the attached Answer and Jury Demand of Defendant Johnson & Johnson to be served by LexisNexis File & Serve upon all counsel of record, including Plaintiffs' Co-Liaison Counsel:

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