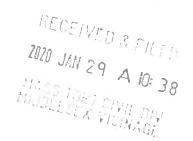
LEVY KONIGSBERG, LLP 800 Third Avenue, 11<sup>th</sup> Floor New York, NY 10022 (212) 605-6200

By: Madeleine Skaller, Esq. (ID#317412019)

Attorneys for Plaintiff



HANNA WILT,

Plaintiff,

V.

JOHNSON & JOHNSON; JOHNSON & JOHNSON CONSUMER INC.; CYPRUS AMAX MINERALS COMPANY, individually and as successorin-interest to American Talc Company, Metropolitan Talc Company, Inc., Charles Mathieu Inc., and Resource Processors, Inc.; CYPRUS MINES CORP., individually and as successorin-interest to Charles Mathieu, Inc., Metropolitan Talc Co., American Talc Co. and Resource Processors, Inc.; John Doe Corporations 1-50 (said names being fictitious, true names being fictitious, true names presently unknown) and John Doe Corporations 51-100 (said names being fictitious, true names presently unknown).

Defendants.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO.: MID-L-

-20AS

Civil Action - Asbestos Litigation

COMPLAINT, JURY DEMAND, DEMAND FOR ANSWERS TO STANDARD INTERROGATORIES AND DESIGNATION OF TRIAL COUNSEL

MID-L-00621-20 AS

LEVY KONIGSBERG LLP

DOCUMENTS WERE RECEIVED BY:

\_\_MAIL\_\_EXPRESS\_\_CERTIFIED\_\_UPS

FEDEX\_\_DHL\_\_BY-HAND ON:

Plaintiff, HANNA WILT by way of complaint against Defendants alleges and says:

## PARTIES - PLAINTIFFS

- 1. Plaintiff, HANNA WILT resides at 310 Atlantic Avenue, Spring Lake, NJ 07762.
- 2. From approximately 1995 to 2019 Plaintiff Hanna Wilt, regularly and frequently used and was exposed to asbestos-containing Johnson & Johnson talc powder products, the use of which generated dust and exposed her to respirable asbestos fibers. Plaintiff, Hanna Wilt's exposure to respirable asbestos fibers from asbestos-containing talc and talc products, manufactured, sold and supplied by the defendants (and their predecessors in interest) proximately caused her mesothelioma.
- 3. As a direct and proximate result of the above exposures, Plaintiff, Hanna Wilt, contracted mesothelioma and suffers from other various diverse injuries and attendant complications.
- 4. Ms. Wilt was diagnosed with mesothelioma on September 1, 2017.
- 5. She was not aware that her disease was the fault of a third party.

- 6. While Ms. Wilt was aware that exposure to asbestos causes mesothelioma, she was unable to identify how she was exposed to asbestos.
- 7. Ms. Wilt was only made aware that she could have been exposed to asbestos through her lifelong use of Johnson's Baby Powder on October 18, 2019, when the FDA reported that it had found asbestos in Johnson's Baby Powder and Johnson & Johnson recalled the product.
- 8. Ms. Wilt did not discover, and could not have discovered through the exercise of reasonable diligence and intelligence, Defendants' role in causing her mesothelioma until the FDA issued its finding of asbestos in Johnson's Baby Powder.

## PARTIES - DEFENDANTS

- 9. The term "Defendants" refers to all of the above-captioned entities.
- 10. Defendants, respectively, were manufacturers, suppliers, sellers or distributors of asbestos fibers, dust, minerals, particles and other finished and unfinished asbestos-containing products, including asbestos-containing talc and talcum powder products, that Plaintiff, Hanna Wilt, used or to which she was exposed.

- 11. Defendants, JOHNSON & JOHNSON; JOHNSON & JOHNSON CONSUMER INC.; CYPRUS AMAX MINERALS COMPANY, individually and as successor-in-interest to American Talc Company, Metropolitan Talc Company, Inc., Charles Mathieu Inc., and Resource Processors, Inc.; and CYPRUS MINES CORPORATION, Individually and as successor in interest to Windsor Minerals, Inc., American Talc Company, Metropolitan Talc Company Inc., Charles Mathieu Inc. and Resource Processors, Inc. were manufacturers, suppliers or distributors of asbestos fibers, dust, minerals, particles and other finished and unfinished asbestos-containing products, including asbestos-containing talc, and talcum powder products that Plaintiff, Hanna Wilt, used or to which she was exposed.
- 12. John Doe Corporations 1-50 (said names being fictitious, true names presently unknown) are the fictitious names of corporations, partnerships and/or other business entities or interest-holders whose identities are not presently known, and who mined, milled, manufactured, supplied, distributed, used, marketed, removed and/or sold talc, talcum powder, asbestos fibers, dust, minerals, particles, finished asbestos-containing products, and/or unfinished asbestos-containing products that the Plaintiff, Hanna Wilt, used or to which she was exposed.

- 13. John Doe Corporations 50-100 (said names being fictitious, true names presently unknown) are the fictitious names of corporations, partnerships and/or other business entities or interest-holders whose identities are not presently known, and who mined, milled, manufactured, supplied, distributed, used, marketed, removed and/or sold talc, talcum powder, asbestos fibers, dust, minerals, particles, finished asbestos-containing products, and/or unfinished asbestos-containing products that the Plaintiff, Hanna Wilt, used or to which she was exposed.
- 14. All defendants engaged in conduct in New Jersey which gave rise to Plaintiff Hanna Wilt's injury, including, but not limited to, mining and milling asbestos-contaminated talc, which was then shipped, supplied and processed and labeled in New Jersey and used to manufacture asbestos-containing talcum powder products used by Plaintiff and her family.
- 15. Defendant Johnson & Johnson has made numerous public statements both before and after Ms. Wilt's diagnosis claiming that its product does not contain asbestos.
- 16. However, on October 18, 2019 the FDA found asbestos in Johnson's Baby Powder and Johnson & Johnson recalled the product.
- 17. Defendants took steps to avoid the detection of and to fraudulently conceal its role in causing Ms. Wilt's mesothelioma. {00431954.DOCX}

#### FIRST COUNT

- 18. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 17 as though hereinafter set forth at length.
- 19. The Defendants conduct and/or have conducted business in New Jersey at all times relevant herein. The Defendants breached their warranties, both express and implied, for fitness of purpose and merchantability.
  - 20. The Defendants are strictly liable in tort.
- 21. As a direct and proximate result of Defendants' negligence, breach of warranties, both express and implied, and strict liability in tort, the Plaintiff, Hanna Wilt, contracted mesothelioma and has suffered, from other various diverse injuries and attendant complications.
- 22. It was foreseeable to the Defendants that the Plaintiff, Hanna Wilt, and others similarly situated, would be injured as a result of the Defendants' actions and misconduct.

wherefore, Plaintiff demands judgment against the
Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;

- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

#### SECOND COUNT

- 23. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 22 as though hereinafter set forth at length.
- 24. The Defendants, jointly and severally, marketed an ultra-hazardous product and placed that product in the stream of commerce.
- 25. As a direct and proximate result of the Defendants' actions, the Plaintiff, Hanna Wilt, contracted mesothelioma and suffered from various diverse injuries and attendant complications.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

#### THIRD COUNT

- 26. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 25 as though hereinafter set forth at length.
- 27. Defendants breached their non-delegable duty to warn and negligently supplied defective materials and products without ensuring that the Plaintiff, Hanna Wilt, was warned about the dangers of asbestos exposure.
- 28. Defendants actions prevented Plaintiff, Hanna Wilt, from educating herself on the dangers of asbestos exposure and from taking action to minimize the risks of exposure in and out of the home.

#### FOURTH COUNT

- 29. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 28 as though hereinafter set forth at length.
- 30. Defendants willfully, wantonly and intentionally conspired, and acted in concert, to withhold information from the Plaintiff, Hanna Wilt, and her family, as well as the general public concerning the known hazards associated with the use of and exposure to talc, including asbestos-containing talc and asbestos products.

- 31. Defendants willfully, wantonly and intentionally conspired, and acted in concert, to withhold information from the Plaintiff, Hanna Wilt, and her family, as well as, the general public relating to the fact that asbestos fiber inhalation could be fatal.
- 32. Defendants willfully, wantonly and intentionally conspired, and acted in concert, to disseminate false product safety information to the Plaintiff, Hanna Wilt, and her family, as well as, the general public.
- 33. Defendants willfully, wantonly and intentionally conspired, and acted in concert, to prevent the dissemination of information concerning their products' hazards and dangers.
- 34. Defendants willfully, wantonly and intentionally failed to take appropriate action to minimize the risks of asbestos exposure to the Plaintiff, Hanna Wilt and her family, as well as, the general public.
- 35. As a direct and proximate result of the Defendants' actions and inaction, the Plaintiff, Hanna Wilt, contracted mesothelioma and suffers from various diverse injuries and attendant complications.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally for:

a) Compensatory damages;

- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

#### FIFTH COUNT

(Product Liability Act Claim)

- 36. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 35 as though hereinafter set forth at length.
- 37. Defendants are <u>strictly liable</u> to Plaintiff by reason of the following:
  - a) Defendants were engaged in the business of being a miner, miller, designer, manufacturer, producer, processor, seller, supplier, and distributor of its asbestos and asbestos-containing products;
  - b) Defendants knew or had reason to know that Plaintiff,

    Hanna Wilt, and other persons similarly situated would

    be ultimate users or consumers of its asbestos and

    asbestos-containing products or would be exposed to its

    asbestos and asbestos-containing products;
- c) Defendants sold or otherwise placed its asbestoscontaining products into the stream of commerce in a {00431954.DOCX}

- defective condition, unreasonably dangerous to Plaintiff, Hanna Wilt, and other persons similarly situated;
- d) Throughout the many years that Plaintiff, Hanna Wilt and other similarly situated persons were exposed to and used Defendants' asbestos-containing products, said asbestos-containing products reached the users and consumers without substantial change in the condition in which they were sold;
- e) The ordinary and foreseeable use of Defendants' asbestoscontaining products constituted a dangerous and
  ultrahazardous activity and created an unreasonable risk
  of injury to users and bystanders;
- f) Defendants' asbestos and asbestos-containing products were defective in that they were incapable of being made safe for their ordinary and intended use and purpose due to their defective design, and Defendants failed to give any warnings or instructions, or failed to give adequate or sufficient warnings or instructions about the risks, dangers and harm associated with the use of its asbestos and asbestos-containing products.
- 38. As a consequence of the defective condition of Defendants' asbestos-containing products and Defendants' failure to warn, Plaintiff, Hanna Wilt inhaled or ingested asbestos dust {00431954.DOCX}

and fibers during ordinary and foreseeable use of those asbestoscontaining products. Plaintiff, Hanna Wilt, was caused to suffer
the injuries, expenses and losses, including severe pain,
suffering and mental anguish as alleged in prior counts of this
Complaint.

WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

#### SIXTH COUNT

- 39. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 38 as though hereinafter set forth at length.
- 40. The Defendants aforesaid were willful, intentionally withheld from the Plaintiff, Hanna Wilt and her family, the known dangers associated with the use of asbestos and asbestoscontaining products, and intentionally withheld from the Plaintiff's knowledge that breathing in asbestos can be fatal. The Defendants issued information, which they knew to be false, {00431954.DOCX}

concerning the safety of their product, and did willfully, wantonly, and intentionally prevent the dissemination of information known to them concerning the products' hazards and dangers, and willfully, wantonly, and intentionally failed to take the appropriate steps to minimize the risks of asbestos exposure, and otherwise acted willfully, wantonly, and intentionally with reference to their products.

41. As a direct and proximate result of the willful, wanton, and intentional acts of the Defendants, both jointly and severally, the Plaintiff, Hanna Wilt, was caused to contract mesothelioma and various other diverse.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

#### SEVETH COUNT

- 42. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 41 as though hereinafter set forth at length.
- 43. As a direct and proximate result of the aforesaid misconduct of the Defendants, Plaintiff, Hanna Wilt, sustained an illness and endures great pain and suffering, and large sums of money were expended for medical care in an endeavor to cure her illness.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

#### JURY DEMAND

Plaintiff demands a trial by jury as to all issues of fact so triable.

#### DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, notice is hereby given that Moshe Maimon, Esq. is designated as trial counsel in the above-captioned matter.

#### DEMAND FOR INTERROGATORIES

Pursuant to the Asbestos Litigation General Order, Section found at can be which VI.B, http://www.judiciary.state.nj.us/masstort/asbestos/manual/general order1.pdf, Plaintiffs hereby demand that the above listed Defendants answer Standard Interrogatories in the form prescribed by the Court and within the time provided by the above referenced Order. A copy of the Standard Interrogatories are contained in the Asbestos Manual and may be obtained from the Clerk or by website: following visiting the http://www.judiciary.state.nj.us/masstort/asbestos/manual/asbesto smanual050306.pdf.

## CERTIFICATION PURSUANT TO R. 4:5-1

Pursuant to <u>Rule</u> 4:5-1, I certify that the matter in controversy is not the subject of any other action pending in any court, or of a pending arbitration proceeding, that no other action or arbitration proceeding is contemplated, and that I am not aware of any non-party who should be joined in this action pursuant to <u>Rule</u> 4:28 or who is subject to joinder pursuant to {00431954.DOCX}

Rule 4:29-1(b) because of potential liability to any party on the basis of the same facts.

I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false that I am subject to punishment.

LEVY KONIGSBERG, LLP

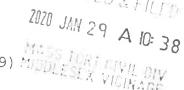
Attorneys for Plaintiff

Bv:

Madeleine Skaller, ESQ.

Dated: January 28, 2020

L'EVY KONIGSBERG, LLP 800 Third Avenue, 11th Floor New York, NY 10022 (212) 605-6200 By: Madeleine Skaller, Esq. (ID#317412019) Model A VICINAGE New York, NY 10022



RECEIVED & FILFD

HANNA WILT,

Plaintiff,

V.

JOHNSON & JOHNSON; JOHNSON & JOHNSON CONSUMER INC.; CYPRUS AMAX MINERALS COMPANY, individually and as successorin-interest to American Talc Company, Metropolitan Talc Company, Inc., Charles Mathieu Inc., and Resource Processors, Inc.; CYPRUS MINES CORP., individually and as successorin-interest to Charles Mathieu, Inc., Metropolitan Talc Co., American Talc Co. and Resource Processors, Inc.; John Doe Corporations 1-50 (said names being fictitious, true names being fictitious, true names presently unknown) and John Doe Corporations 51-100 (said names being fictitious, true names presently unknown).

Defendants.

SUPERIOR COURT OF NEW JERSEY LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO.: MID-L-

-20AS

### Civil Action - Asbestos Litigation

INITIAL FACT SHEET

MID-L-00621-20 H

1.	Full Name:	HANNA WILT				
2.	Date of Birth:	1/29/1995				
3.	Address:	310 Atlantic Ave. Spring Lake, NJ 07762				
4.	Union/Local/Year of Membership:	None				
5.	Date of first claimed asbestos exposure:	Approximately 1996				
6.	Date of last claimed asbestos exposure:	Approximately 2019				
7,	Smoking History:	None.				
8.	State the inclusive products smoked an consumed per day:	dates of smoking history, the d the amount of product				
a.	Dates:					
b.	Products smoked:					
c.	Amount per day:					
9.	9. Provide as much of the following information as is presently available: work sites, inclusive dates and trade or occupation for each site:					
		pproximately from 1996 to 2019  Talc Powder Products				
10. State the claimed asbestos related diseases; include the date of diagnosis and the name of the diagnosing physician or institution (if available attached is a copy of the medical report).						
a.		Mesothelioma				

b. Date of Diagnosis:	September 1, 2017
c. Doctor/Institution:	Abu Alam, MD Brigham Women's Hospital

LEVY KONIGSBERG, LLP Attorneys for Plaintiff

Ву:

Madeleine Skaller, Esq.

Dated: January 28, 2020

## Appendix XII-B1



# **CIVIL CASE INFORMATION STATEMENT** (CIS)

FOR USE BY CLERK'S OFFICE ONLY
PAYMENT TYPE: ☐CK ☐CG ☐CA
CHG/CK NO.
Amount:
OVERPAYMENT:
BATCH NUMBER:

THE STATE OF THE S	Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c) if information above the black bar is not completed or attorney's signature is not affixed					AMOUNT:  OVERPAYMENT:  BATCH NUMBER:				
1. ATTORNEY / PRO SE NAME Madeleine Skaller (NJ ID: 317412019)				2. TELEPHONE NUMBER 3. COUNTY OF VENUE (212) 605-6200 Middlesex						
4. FIRM NAME (if ap	<u> </u>	D. 317412019)					KET NUMBER (when available)			
Levy Konigsberg	, LLP						MID-L20AS			
6. OFFICE ADDRESS 800 Third Avenue, 11th Floor New York, NY 10022							Comp	7. DOCUMENT TYPE Complaint MID-L- 00621-20		
							Y DEMAND YES No			
9. NAME OF PARTY (e.g., John Doe, Plaintiff) HANNA WILT				10. CAPTION HANNA WILT v. JOHNSON & JOHNSON, et al.						
11. CASE TYPE NUI (See reverse side for 601		12. HURRICANE SANDY RELATED? ☐ YES ■ NO	13. IS THIS A PROFESSIONAL MALPRACTICE CASE? ☐ YES ■ NO  IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.							
14. RELATED CASES PENDING? ☐ YES ■ NO				15. IF YES, LIST DOCKET NUMBERS						
16. DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)?  ☐ YES ■ NO				17. NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known)  □ NONE □ UNKNOWN						
								ED INTO EVIDENCE.		
		OR PURPOSES OF DE		IG IF CASE IS: S THAT RELA			MEDIATI	ON		
RECURRENT RELATIONSHIP?			☐ EMPL	☐ EMPLOYER/EMPLOYEE ☐ FRIEND/NEIGHBOR ☐ OTHER (explain) ☐ FAMILIAL ☐ BUSINESS						
		VERNING THIS CASE F								
20. USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION										
21. Do you or your client need any disability accommodations? If yes, please identify the requested accommodation  yes No					REQUESTEDACCOMMODATION					
22. WILL AN INTERPRETER BE NEEDED?  ☐ YES ■ NO				IF YES, FOR WHAT LANGUAGE?						
23. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).										
24. ATTORNEY SIGNATURE: All										

#### Side 2



## CIVIL CASE INFORMATION STATEMENT

(CIS)

Use for initial pleadings (not motions) under Rule 4:5-1 **CASE TYPES** (Choose one and enter number of case type in appropriate space on the reverse side.) Track I - 150 days' discovery 151 NAME CHANGE 175 FORFEITURE 302 TENANCY 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction) 502 BOOK ACCOUNT (debt collection matters only) 505 OTHER INSURANCE CLAIM (including declaratory judgment actions) 506 PIP COVERAGE 510 UM or UIM CLAIM (coverage issues only) 511 ACTION ON NEGOTIABLE INSTRUMENT 512 LEMON LAW 801 SUMMARY ACTION 802 OPEN PUBLIC RECORDS ACT (summary action) 999 OTHER (briefly describe nature of action) Track II - 300 days' discovery 305 CONSTRUCTION 509 EMPLOYMENT (other than CEPA or LAD) 599 CONTRACT/COMMERCIAL TRANSACTION 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold) 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold) 605 PERSONAL INJURY 610 AUTO NEGLIGENCE - PROPERTY DAMAGE UM or UIM CLAIM (includes bodily injury) 621 699 TORT - OTHER Track III - 450 days' discovery 005 CIVIL RIGHTS 301 CONDEMNATION 602 ASSAULT AND BATTERY 604 MEDICAL MALPRACTICE 606 PRODUCT LIABILITY 607 PROFESSIONAL MALPRACTICE 608 TOXIC TORT 609 DEFAMATION 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES 617 INVERSE CONDEMNATION 618 LAW AGAINST DISCRIMINATION (LAD) CASES Track IV - Active Case Management by Individual Judge / 450 days' discovery 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION 303 MT. LAUREL 508 COMPLEX COMMERCIAL 513 COMPLEX CONSTRUCTION 514 INSURANCE FRAUD 620 FALSE CLAIMS ACT 701 ACTIONS IN LIEU OF PREROGATIVE WRITS **Multicounty Litigation (Track IV)** 271 ACCUTANE/ISOTRETINOIN 292 PELVIC MESH/BARD 293 DEPUY ASR HIP IMPLANT LITIGATION 274 RISPERDAL/SEROQUEL/ZYPREXA 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL 295 ALLODERM REGENERATIVE TISSUE MATRIX STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS 296 282 FOSAMAX 285 STRYKER TRIDENT HIP IMPLANTS 297 MIRENA CONTRACEPTIVE DEVICE 299 **OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR** 286 LEVAQUIN 300 TALC-BASED BODY POWDERS 287 YAZ/YASMIN/OCELLA 601 **ASBESTOS** 289 REGLAN POMPTON LAKES ENVIRONMENTAL LITIGATION 623 **PROPECIA** 

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics.

Please check off each applicable category	Putative Class Action	☐ Title 59

291

PELVIC MESH/GYNECARE