

IN RE: ALLODERM® LITIGATION

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY**

CASE NO. 295

CIVIL ACTION

PLAINTIFFS,

Plaintiff,

v.

LIFECELL CORPORATION

Defendant.

**SHORT FORM COMPLAINT FOR
HERNIA REPAIR AND ABDOMINAL
RECONSTRUCTION**

JURY TRIAL DEMANDED

**SHORT FORM COMPLAINT FOR ALLODERM® LITIGATION
AND ADOPTION BY REFERENCE**

1. Pursuant to Case Management Order No. ____ entered in In Re: AlloDerm® Litigation, Case Number 295, the undersigned counsel hereby submit this Short Form Complaint and Jury demand against Defendant LifeCell Corporation and adopt and incorporate by reference all relevant portions of the Master Long Form Complaint for In re: AlloDerm® Litigation, Case Number 295, and any and all amendments thereto.

2. Plaintiff, _____, and Plaintiff's Spouse,
_____, against the Defendant.

a. Plaintiff Full Name: _____

b. Plaintiff's Spouse Full Name: _____

c. State of Residence: _____

d. Date(s) of AlloDerm implant(s) (list all): _____

e. State(s) where AlloDerm was implanted: _____

f. Hospital(s) where AlloDerm was implanted: _____

g. Date(s) of AlloDerm failure: _____

3. The AlloDerm used in Plaintiff completely failed resulting in:

_____ hernia recurrence	_____ disability
_____ abdominal deformity	_____ other (describe) _____
_____ pain	_____

4. Plaintiff has suffered and will continue to suffer pain, suffering, disability, impairment, loss of enjoyment of life, inability to engage in chosen and necessary activities, and/or economic damages, as a result of the implantation of AlloDerm. The failure of the AlloDerm used in Plaintiff also resulted in:

_____ requiring Plaintiff to undergo additional surgery(ies)

_____ other: Describe _____

5. The following claims asserted in the Master Long Form Complaint for In re: AlloDerm® Litigation against Defendant LifeCell Corporation and the allegations with regard thereto are herein adopted by reference:

_____ COUNT I - Products Liability Failure to Warn

_____ COUNT II - Products Liability Defective Manufacturing

_____ COUNT III - Products Liability Design Defect

_____ COUNT IV - Per Quod

6. Plaintiff asserts the following additional facts and theories of recovery against

Defendant: _____.

Respectfully submitted,

ANAPOL, SCHWARTZ, WEISS, COHAN,
FELDMAN & SMALLEY, P.C.

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Of Counsel

Attorneys for Plaintiffs

Dated: _____

JURY DEMAND

Plaintiffs hereby demand a trial by jury.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Lawrence R. Cohan, Esquire and Adrienne E. Walvoord, Esquire are hereby designated as trial counsel for Plaintiffs in the within matter.

RULE 4:5-I CERTIFICATION

I hereby certify that to the best of my knowledge that matter in controversy is the subject of numerous other actions all of which are assigned to the Honorable Jessica R. Mayer in the Superior Court of New Jersey Middlesex County under the Master Case Number 295, and that no other parties are necessary to join at this time.

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

**ANAPOL, SCHWARTZ, WEISS, COHAN,
FELDMAN & SMALLEY, P.C.**

**LAWRENCE R. COHAN, ESQUIRE
ADRIANNE E. WALVOORD, ESQUIRE**
Attorneys for Plaintiffs

SOL H. WEISS, ESQUIRE
Of Counsel

Dated: _____