PRINT FORM RESET FORM

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

In Re: American Medical Systems, Inc., Pelvic Repair System Products Liability Litigation
MDL No. 2325

Civil Action No. _____

SHORT FORM COMPLAINT

Come now the Plaintiff(s) named below, and for Complaint against the Defendants named below, incorporate The First Amended Master Complaint in MDL No. 2325 by reference. Plaintiff(s) further show the court as follows:

1. Female Plaintiff

   _____

2. Plaintiff Spouse

   _____

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)

   _____

4. State of Residence

   _____

5. District Court and Division in which venue would be proper absent direct filing _____

   _____

6. Defendants (Check Defendants against whom Complaint is made):

   ☐ A. American Medical Systems, Inc. ("AMS")

   ☐ B. American Medical Systems Holdings, Inc. ("AMS Holdings")

☐ C. Endo Pharmaceuticals, Inc.

☐ D. Endo Health Solutions Inc. (f/k/a Endo Pharmaceuticals Holdings, Inc.)

☐ E. Ethicon, Inc.

☐ F. Ethicon, LLC

☐ G. Johnson & Johnson

☐ H. Boston Scientific Corporation

☐ I. C. R. Bard, Inc. ("Bard")

☐ J. Sofradim Production SAS ("Sofradim")

☐ K. Tissue Science Laboratories Limited ("TSL")

☐ L. Analytic Biosurgical Solutions ("ABISS")

☐ M. Mentor Worldwide LLC

☐ N. Coloplast A/S

☐ O. Coloplast Corp.

☐ P. Coloplast Manufacturing US, LLC

☐ Q. Porges S.A.

7. Basis of Jurisdiction

☐ Diversity of Citizenship

☐ Other:

A. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

B. Other allegations of jurisdiction and venue

8. Defendants' products implanted in Plaintiff (Check products implanted in Plaintiff)

- ☐ A. Apogee;
- ☐ B. Perigee;
- ☐ C. MiniArc Sling;
- ☐ D. Monarc Subfascial Hammock;
- ☐ E. SPARC;
- ☐ F. In-Fast;
- ☐ G. BioArc;
- ☐ H. Elevate;
- ☐ I. Straight-In;
- ☐ J. Other

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9. Defendants' Products about which Plaintiff is making a claim. (Check applicable products)

- ☐ A. Apogee;
- ☐ B. Perigee;
- ☐ C. MiniArc Sling;
- ☐ D. Monarc Subfascial Hammock;
- ☐ E. SPARC;

☐ F. In-Fast;

☐ G. BioArc;

☐ H. Elevate;

☐ I. Straight-In;

☐ J. Other;

10. Date of Implantation as to Each Product

11. Hospital(s) where Plaintiff was implanted (including City and State)

12. Implanting Surgeon(s)

13. Counts in the Master Complaint brought by Plaintiff(s)

☐ Count I - Negligence

☐ Count II – Strict Liability – Design Defect

☐ Count III – Strict Liability – Manufacturing Defect

☐ Count IV – Strict Liability – Failure to Warn

☐ Count V - Strict Liability – Defective Product

☐ Count VI - Breach of Express Warranty

☐ Count VII – Breach of Implied Warranty

☐ Count VIII – Fraudulent Concealment

☐ Count IX – Constructive Fraud

☐ Count X - Discovery Rule, Tolling and Fraudulent Concealment

☐ Count XI – Negligent Misrepresentation

☐ Count XII – Negligent Infliction of Emotional Distress

☐ Count XIII – Violation of Consumer Protection Laws

☐ Count XIV – Gross Negligence

☐ Count XV - Unjust Enrichment

☐ Count XVI - (By the Spouse) – Loss of Consortium

☐ Count XVII – Punitive Damages

☐ Other _____ (please state the facts supporting this Count in the space, immediately below)

☐ Other _____ (please state the facts supporting this Count in the space, immediately below)

Attorneys for Plaintiff

Address and bar information: