

DOCKET # X06-UWY-CV-14-6025333-S : SUPERIOR COURT
:
ROBIN SHERWOOD, ET AL : J.D. OF WATERBURY
:
v. : COMPLEX LITIGATION DOCKET
:
STAMFORD HEALTH SYSTEM, ET AL : SEPTEMBER 19, 2016

**JOHNSON & JOHNSON’S OBJECTIONS TO
PLAINTIFF’S REQUEST FOR PRODUCTION**

Pursuant to Section 13-10 of the Connecticut Practice Book, the third-party defendant, Johnson & Johnson, objects to Plaintiff’s Request for Production as set forth below.

OBJECTIONS TO REQUEST FOR PRODUCTION NOS. 1 – 35:

Johnson & Johnson objects to the Requests on the grounds that it is a holding company that does not design, manufacture, market, distribute or sell any products, including the product at issue in this case. Johnson & Johnson states that Ethicon, Inc. manufactured the product known as Prolift. Johnson & Johnson further states that to the best of its knowledge, to the extent that any defendant has information responsive to the Requests for Production, Ethicon, Inc., not Johnson & Johnson, has such information.

Respectfully submitted,

DEFENDANT JOHNSON & JOHNSON,

By: /s/Christopher R. Drury

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 19, 2016, a copy of the foregoing **JOHNSON & JOHNSON'S OBJECTIONS TO PLAINTIFF'S REQUEST FOR PRODUCTION** was sent by email to the following counsel of record:

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