

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 : OCTOBER 17, 2016

**MOTION FOR ADMISSION OF  
SANFORD E. WATSON, ESQ. PRO HAC VICE**

Pursuant to Practice Book § 2-16, the undersigned counsel for Defendants Johnson & Johnson and Ethicon, Inc. (collectively “Ethicon”), hereby respectfully moves the Court to permit Sanford E. Watson to be admitted to practice *pro hac vice*, for all purposes, in this action. The Affidavit of Attorney Watson in support of this motion is attached hereto as Exhibit A.

The attached affidavit of Sanford E. Watson sets forth the following facts:

1. Sanford E. Watson is a partner with the law firm of Tucker Ellis LLP, 950 Main Avenue, Suite 1100, Cleveland Ohio 44113, (216) 696-2385. His email address is [sanford.watson@tuckerellis.com](mailto:sanford.watson@tuckerellis.com).
2. Attorney Watson is a member in good standing of the Bar of the State of Ohio, where he was admitted in 1988; the Supreme Court of the United States; the U.S. District

Courts for the Northern and Southern Districts of Ohio; and the United States Court of Appeals for the Federal Circuit.

3. Attorney Watson has no grievances or other disciplinary proceedings pending against him in any jurisdiction.

4. Attorney Watson has never been reprimanded, suspended, disbarred, or otherwise disciplined, and he has never resigned from the practice of law.

5. Attorney Watson has never previously appeared *pro hac vice* in the Superior Court of the State of Connecticut.

6. Attorney Watson certifies that he has paid the Client Security Fund fee due for the calendar year 2016 at the time of filing.

7. Attorney Watson designates the chief clerk of the Judicial District of Waterbury as his agent upon whom process and service of notice may be served.

8. Attorney Watson agrees to register with the Statewide Grievance Committee while appearing in the captioned matter, and for two years after the completion of this matter, and to notify the Statewide Grievance Committee of the expiration of the two year period.

9. Attorney Watson and his law firm have a long-standing attorney-client relationship with Ethicon that predates this litigation. Attorney Watson possesses specialized

knowledge about Ethicon's business and the facts and circumstances surrounding its action in this matter, which makes his involvement in this matter very important to the instant dispute. Accordingly, Ethicon has requested that Attorney Watson and his firm participate in its representation in this matter.

The undersigned represents that he is a member in good standing of this Court, and that he or another attorney from Shipman & Goodwin LLP admitted in Connecticut will be present at all proceedings, will sign all pleadings, briefs, and other papers filed with the Court, and will assume full responsibility for them and for the conduct of the case and of the attorney to whom such privilege of appearing in this matter *pro hac vice* is accorded.

WHEREFORE, based on the foregoing, the undersigned respectfully moves that Attorney Watson be admitted *pro hac vice*.



**CERTIFICATION OF SERVICE**

The undersigned hereby certifies that on **October 17, 2016**, a copy of the foregoing **MOTION FOR ADMISSION OF SANFORD E. WATSON, ESQ. PRO HAC VICE** was sent via email to the following counsel of record:

Brenden P. Leydon, Esq.  
Jaqueline E. Fusco, Esq.  
Tooher, Woel & Leydon, LLC  
80 Fourth Street  
Stamford, CT 06905  
Tel.: (203) 517-0456  
Fax: (203) 324-1407  
E-mail: [BLeydon@toohervoel.com](mailto:BLeydon@toohervoel.com)  
[jfusco@toohervoel.com](mailto:jfusco@toohervoel.com)

*Attorneys for Plaintiff*

Eric J. Stockman, Esq.  
Simon I. Allentuch, Esq.  
Neubert, Pepe & Monteith, P.C.  
195 Church Street, 13<sup>th</sup> Floor  
New Haven, CT 06510  
Tel.: (203) 821-2000  
Fax: (203) 821-2009  
E-mail: [estockman@npmlaw.com](mailto:estockman@npmlaw.com)  
[SAllentuch@npmlaw.com](mailto:SAllentuch@npmlaw.com)  
*Attorneys for Defendant Stamford Health  
System Inc. d/b/a Stamford Hospital*

/s/ Christopher Drury

\_\_\_\_\_  
Christopher R. Drury

# EXHIBIT A

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 : OCTOBER 11, 2016

**AFFIDAVIT OF SANFORD E. WATSON, ESQ.**  
**IN SUPPORT OF APPLICATION FOR ADMISSION *PRO HAC VICE***

The undersigned, Sanford E. Watson, being duly sworn, hereby deposes and says that:

1. I am over the age of eighteen and understand the obligations of an oath.
2. I make this Affidavit based on personal knowledge of the facts stated herein.
3. I submit this Affidavit, pursuant to Connecticut Practice Book § 2-16, in support of the motion for my admission *pro hac vice* in the above-entitled action pending at the Superior Court of the State of Connecticut in the Complex Litigation Docket, Judicial District of Waterbury.
4. I am a partner with the law firm of Tucker Ellis LLP, 950 Main Avenue, Suite 1100, Cleveland, Ohio, 44113, (216) 696-2385. My email address is [sanford.watson@tuckerellis.com](mailto:sanford.watson@tuckerellis.com).
5. I am a member in good standing of the Bar of the State of Ohio, where I was admitted in 1988; the Supreme Court of the United States; the U.S. District Courts for the

Northern and Southern Districts of Ohio; and the United States Court of Appeals for the Federal Circuit.

6. There are no grievances or other disciplinary proceedings pending against me in any jurisdiction.

7. I have never been reprimanded, suspended, placed on an inactive status, disbarred, or otherwise disciplined, and I have never resigned from the practice of law.

8. I am not licensed to practice in the Superior Court for the State of Connecticut.

9. I have never previously appeared *pro hac vice* in the Superior Court of the State of Connecticut.

10. I certify that I have paid the Client Security Fund fee due for the calendar year 2016.

11. I hereby designate the chief clerk of the Complex Litigation Docket, Judicial District of Waterbury as my agent upon whom process and service of notice may be served.

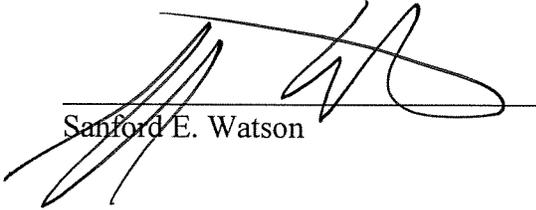
12. I agree to register with the Statewide Grievance Committee while appearing in the captioned matter and for two years after the completion of this matter. I agree to notify the Statewide Grievance Committee of the expiration of the two year period.

13. My clients, Johnson & Johnson and Ethicon, Inc., desire my representation in this case in light of the long-standing attorney-client relationship with me and my firm, as well as my specialized knowledge about its business and the facts and circumstances

surrounding its action in this matter. My relationship with Johnson & Johnson and Ethicon existed before the cause of action alleged in this matter arose. Johnson & Johnson and Ethicon have requested that I and my firm participate in its representation in this matter.

14. Johnson & Johnson and Ethicon have engaged Robert R. Simpson and Christopher R. Drury, members of the bar of the State of Connecticut, and attorneys at Shipman & Goodwin LLP, One Constitution Plaza, Hartford, Connecticut 06103 to represent it in the defense of this matter. Shipman & Goodwin LLP has entered an appearance on behalf of Johnson & Johnson and Ethicon, and Attorneys Simpson or Drury, or another lawyer from Shipman & Goodwin LLP admitted in Connecticut, will be present at all proceedings and will sign all pleadings, briefs, and other papers filed with the court and will assume full responsibility for them and for the conduct of the case if I am allowed to appear *pro hac vice* for Johnson & Johnson and Ethicon.

15. I declare under penalty of perjury that the foregoing is true and correct.

  
Sanford E. Watson

STATE OF OHIO            )  
  )  
COUNTY OF CUYAHOGA)

ss:

On this 11 day of October 2016, before me, the undersigned notary, personally appeared SANFORD E. WATSON and executed the foregoing instrument for the purposes therein contained by signing and by making solemn oath as to the truth of the same.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.



**VALERIE A. SALVINC**  
Notary Public, State of Ohio  
My Commission Expires  
November 25, 2017

Valerie A. Salvinc  
Notary Public  
My Commission Expires **NOV. 25, 2017**