

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 : NOVEMBER 1, 2016

**MOTION FOR ADMISSION OF
RITA A. MAIMBOURG, 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 Rita Maimbourg to be admitted to practice *pro hac vice*, for all purposes, in this action. The Affidavit of Attorney Maimbourg in support of this motion is attached hereto as Exhibit A.

The attached affidavit of Rita A. Maimbourg sets forth the following facts:

1. Rita A. Maimbourg is a partner with the law firm of Tucker Ellis LLP, 950 Main Avenue, Suite 1100, Cleveland Ohio 44113, (216) 696-3219. Her email address is rita.maimbourg@tuckerellis.com.
2. Attorney Maimbourg is a member in good standing of the Bar of the State of Ohio, where she was admitted in 1981; the U.S. District Courts for the Northern and Southern Districts of Ohio, where she was admitted in 1981; the U.S. District Court for the

Eastern District of Michigan, where she was admitted in 1992; the U.S. District Court for the Northern District of Illinois, where she was admitted in 2010; and the U.S. Court of Appeals for the Sixth Circuit, where she was admitted in 1983.

3. Attorney Maimbourg has no grievances or other disciplinary proceedings pending against her in any jurisdiction.

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

5. Attorney Maimbourg has previously appeared *pro hac vice* in the Superior Court of the State of Connecticut in the matter captioned *Mary Beth Farrell, et al. v. Johnson & Johnson, et al.*, Docket No.: X06-UWY-CV-11-6014102-S, and in the matter captioned *Dana LeMay, et al v. Johnson & Johnson, et al.*, Docket No.:X06-UWY-CV-13-6022061-S.

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

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

8. Attorney Maimbourg 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 Maimbourg and her law firm have a long-standing attorney-client relationship with Ethicon that predates this litigation. Attorney Maimbourg possesses specialized knowledge about Ethicon's business and the facts and circumstances surrounding its action in this matter, which makes her involvement in this matter very important to the instant dispute. Accordingly, Ethicon has requested that Attorney Maimbourg and her 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 Maimbourg be admitted *pro hac vice*.

Respectfully submitted,

THIRD PARTY DEFENDANTS,
JOHNSON & JOHNSON and
ETHICON, INC.

By Christopher R. Drury

Robert R. Simpson

Christopher R. Drury

Shipman & Goodwin LLP

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rsimpson@goodwin.com

cdrury@goodwin.com

Their Attorneys

CERTIFICATION OF SERVICE

The undersigned hereby certifies that on November 1, 2016, a copy of the foregoing MOTION FOR ADMISSION OF RITA A. MAIMBOURG, ESQ. *PRO HAC VICE* was sent via email to the following counsel of record:

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*Attorneys for Defendant Stamford Health
System Inc. d/b/a Stamford Hospital*

/s/ Christopher R. Drury
Christopher R. Drury

EXHIBIT A

DOCKET # X06-UWY-CV-14-6025333-S : SUPERIOR COURT
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AFFIDAVIT OF RITA MAIMBOURG, ESQ.
IN SUPPORT OF APPLICATION FOR ADMISSION *PRO HAC VICE*

The undersigned, Rita A. Maimbourg, 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) 696-3219. My email address is rita.maimbourg@tuckerellis.com.
5. I am a member in good standing of the Bar of the State of Ohio, where I was admitted in 1981; the U.S. District Courts for the Northern and Southern Districts of Ohio,

where I was admitted in 1981; the U.S. District Court for the Eastern District of Michigan, where I was admitted in 1992; the U.S. District Court for the Northern District of Illinois, where I was admitted in 2010; and the U.S. Court of Appeals for the Sixth Circuit, where I was admitted in 1983.

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 previously appeared *pro hac vice* in the Superior Court of the State of Connecticut in the matter captioned *Mary Beth Farrell, et al. v. Johnson & Johnson, et al.*, Docket No.: X06-UWY-CV-11-6014102-S, and in the matter captioned *Dana LeMay, et al v. Johnson & Johnson, et al.*, Docket No.:X06-UWY-CV-13-6022061-S.

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

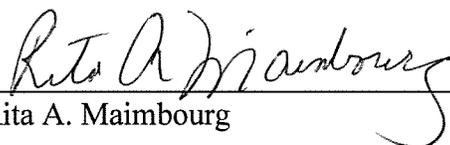
11. I hereby designate the chief clerk of the Complex Litigation Docket, Judicial District of Waterbury as my agent upon whom process and service of notice may be served.

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.

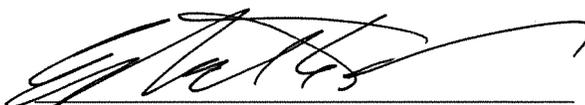

Rita A. Maimbourg

STATE OF OHIO)
)
COUNTY OF CUYAHOGA)

SS:

On this 31st day of October 2016, before me, the undersigned notary, personally appeared RITA A. MAIMBOURG 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.



Notary Public
My Commission Expires

EDWARD E. TABER, JR.
NOTARY PUBLIC • STATE OF OHIO
My Commission Has No Expiration Date
Section 147.08 O.R.C.