

DOCKET NO.: CV-14-6025333-S : **COMPLEX DOCKET**
ROBIN SHERWOOD and
GREG HOELSCHER : **J.D. OF WATERBURY**
V. : **AT WATERBURY**
STAMFORD HEALTH SYSTEM, INC.
D/B/A STAMFORD HOSPITAL : **NOVEMBER 18, 2016**

MOTION TO FILE UNDER SEAL

Pursuant to Practice Book § 7-4B, defendant, Stamford Hospital, respectfully moves the court for an order to file under seal an exhibit subject to a Confidentiality Stipulation and Order and which is referenced in defendant's Reply in Support of its Motion for Summary Judgment filed on November 14, 2016. In support of this motion, see defendant's Memorandum in Support of Motion to File Under Seal attached hereto. A redacted copy of the proposed exhibit is attached. The full exhibit will be lodged with the Court pursuant to Conn. R. Ct. § 7-4C

**DEFENDANT,
STAMFORD HEALTH SYSTEM
D/B/A STAMFORD HOSPITAL**

/s/ Simon I. Allentuch
Simon I. Allentuch
NEUBERT, PEPE & MONTEITH, P.C.
195 Church Street, 13th Floor
New Haven, CT 06510
Tel. (203) 821-2000
Juris No. 407996
(203) 821-2000

CERTIFICATION

THIS IS TO CERTIFY THAT a copy of the foregoing was mailed, postage prepaid, by
U.S. Mail, this 18th day of November, 2016, to the following party of record:

Brenden P. Leydon, Esq.
Jackie Fusco, Esq.
Tooher, Woel & Leydon, LLC
80 4th Street
Stamford, CT 06905

/s/Simon I. Allentuch
NEUBERT, PEPE & MONTEITH, P.C.

Fax

To: Dr. Brian Hines

From: Michael Connaughton

Ethicon Worldwide Customer Quality

Fax: 203-391-6624

Fax: 908-218-2579

Pages: 2 pages + cover sheet (3 pages total)

Date: 06/24/2008

Confidentiality Notice: This fax transmission may contain confidential or legally privileged information that is intended only for the individual or entity named in the fax address. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or reliance upon the contents of this fax is strictly prohibited. If you have received this fax transmission in error, please reply to the sender, so that Johnson & Johnson can arrange for proper delivery, and then please dispose of the message. Thank you.

REDACTED

ETHICON

P.O. Box 161, Route 22 West
Somerville, NJ 08876-0161

www.ethiconwhu.com

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 Johnson & Johnson company



ETHICON
Women's Health & Urology

June 4, 2008

Dr. Brian Hines
Fax # 203-391-6624

Re: 99999P17 -- PROLIFT Pelvic Floor Repair
Our Product Complaint # 10100071597
Patient Initials: Robin Sherwood

Dear Dr. Hines,

Robin Sherwood, your patient, has told us about your recent experience with PROLIFT Pelvic Floor Repair.

REDACTED

1.877.ETHICON
P.O. Box 22 West
Farmington, CT 06032-0022
ethiconwhu.com

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Part of ETHICON, INC.

CONFIDENTIAL
SUBJECT TO STIPULATION AND ORDER OF CONFIDENTIALITY

SHERWOOD.ETH.MESH.00000004



REDACTED

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Connaughton".

Michael Connaughton
Worldwide Customer Quality

1.877.ETHICON

P.O. Box 161, Route 22 West
Somerville, NJ 08876-0161

www.ethiconwhu.com

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Johnson & Johnson company

May 22, 2008

Mrs. Robin Sherwood
#1 Clapboard
Ridge Road
Greenwich, CT 06830

Re: 99999P17 - UNKNOWN PROLIFT PRODUCT
Reference # 10100071597

Dear Mrs. Sherwood,

Thank you for telling us about your experience with the PROLIFT PRODUCT.

REDACTED

Sincerely,

Michael Connaughton
Worldwide Customer Quality

Enclosed: Medical Release Form and Ethicon Addressed stamped Envelope

May 18, 2009

Mrs. Robin Sherwood
#1 Clapboard
Ridge Road
Greenwich, CT 06830

Re: 99999P17 - UNKNOWN PROLIFT PRODUCT
Reference # 10100071597

Dear Mrs. Sherwood,

Thank you for telling us about your experience with the PROLIFT PRODUCT.

REDACTED

Sincerely,

Michael Connaughton
Worldwide Customer Quality

TRANSMISSION VERIFICATION REPORT

TIME : 06/04/2008 13:49
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