

**DOCKET NO.: UWY-CV-14-6025333S** : **SUPERIOR COURT**  
**ROBIN SHERWOOD and**  
**GREG HOELSCHER** : **COMPLEX DOCKET**  
**V.** : **AT WATERBURY**  
**STAMFORD HEALTH SYSTEM, INC.**  
**D/B/A STAMFORD HOSPITAL** : **DECEMBER 3, 2014**

**MOTION FOR ORDER**

Defendant, Stamford Health Systems, Inc., d/b/a Stamford Hospital (“Stamford Hospital”) respectfully submits this Motion for Order limiting the number of depositions of each witness.

In support of this Motion, Stamford Hospital states that it has repeatedly offered to produce Ruth Cardiello and Dr. Lance Bruck for deposition so long as plaintiffs agree that there will be one deposition of each of these witnesses. Dr. Bruck did not treat the plaintiff and neither witness has any personal knowledge about the plaintiff, her surgeries or her condition. See Affidavit of Ruth Cardiello. Plaintiffs’ counsel refused.

All vaginal mesh cases in Connecticut which are pending in state court have been consolidated before this Court. Presumably the goal of consolidating the cases is to limit unnecessary discovery and conserve judicial resources. The MDL for vaginal mesh has set a rule limiting repeat depositions of the same witness. The MDL court ordered: “[a]bsent exigent circumstances, as a general rule, no witness should be deposed in the MDL proceeding on the same subject more than once.” A copy is attached. Stamford Hospital respectfully requests that the Court institute this rule and require the parties to file a motion and obtain court permission to take a second deposition of the same witness.

There is no reason why Ruth Cardiello, for example, should be deposed three times on the same subject. The same can be said for Dr. Bruck, who is a third party. The proposed order would be fair to witness and all counsel. The motion should therefore be granted.

DEFENDANT,  
THE STAMFORD HEALTH SYSTEMS INC.

/s/ Simon I. Allentuch

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**CERTIFICATION**

This is to certify that a copy of the foregoing was mailed, postage prepaid, this 3<sup>rd</sup> day of  
December, 2014 to the following counsel of record:

Brenden P. Leydon, Esq.  
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**/s/ Simon I. Allentuch**  
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