

Civil Practice Division

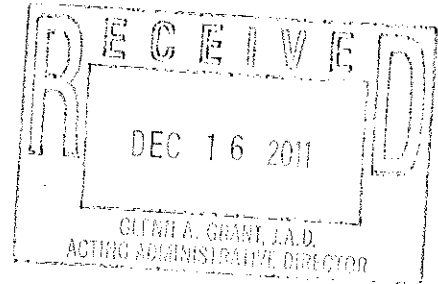
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December 15, 2011

VIA FEDERAL EXPRESS



Hon. Glenn A. Grant, J.A.D.
Acting Administrative Director of New Jersey Courts
Administrative Office of the Courts
Hughes Justice Complex
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**Re: Application for Centralized Management of Cases Involving Certain
NexGen Flex Products**

Dear Judge Grant:

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We represent defendants Zimmer Holdings, Inc., Zimmer, Inc., Zimmer Orthopaedic Surgical Products, Inc., Zimmer Orthobiologics, Inc., and Orthopedic Technologies, LLC, d/b/a Zimmer Tri-State (collectively, "Zimmer") in a number of New Jersey product liability cases alleging personal injuries arising from the use of certain orthopedic knee devices, which were sold under the NexGen® Knee System brand name and include a "flex" design component. There are presently over 130 cases involving similar products pending in a federal multi-district litigation, designated as MDL-2272 - In Re: Zimmer NexGen Knee Implant Products Liability Litigation ("NexGen MDL"), in the Northern District of Illinois. That MDL litigation is assigned to United States District Judge Rebecca R. Pallmeyer. We write, pursuant to New Jersey Court Rule 4:38A and Directive #7-09, to request that all cases currently pending in the Superior Court of New Jersey involving the same allegations at issue in the NexGen MDL, be centralized for case management here in New Jersey. Zimmer makes this request now to ensure that these cases, and any future similar cases, proceed in an organized and judicially-efficient fashion.

BOSTON

HARTFORD

NEW YORK

NEWARK

PHILADELPHIA

STAMFORD

WILMINGTON

As outlined in more detail below, the centralization of these cases is necessary to avoid duplicative discovery and inconsistent rulings, and to promote the interests of justice and fairness. Moreover, centralized case management of these cases will help to conserve judicial resources and to ensure that there is a single judge in New Jersey to coordinate with the NexGen MDL and to work with other coordinated proceedings, which may arise in other jurisdictions. There is also a strong likelihood that a significant number of similar cases may be filed in New Jersey and other venues in the near future.

In making this request, Zimmer seeks to centralize only those New Jersey cases that contain allegations and products analogous to those at issue in the NexGen MDL. Specifically, this includes all cases involving the NexGen CR-Flex Porous Femoral Component, NexGen CR-Flex Precoat Femoral Component, NexGen Gender Solutions CR-Flex Precoat Femoral Component, NexGen LPS Flex Precoat Femoral Component, NexGen LPS Flex Option Femoral Component, NexGen Gender Solutions LPS-Flex Femoral Component, and MIS Total Knee Procedure Stemmed Tibial Component Fixed Bearing Precoat¹ (hereinafter, the "NexGen Flex Femoral Components"). A detailed list of the current New Jersey cases involving these specific products is attached as Exhibit A.

Zimmer is not seeking the centralization of cases currently pending in New Jersey that do not involve NexGen Flex Femoral Components. While these other cases involve products with the NexGen brand name, the products at issue in these cases have little similarity with the CR-Flex, LPS-Flex, and MIS Tibia components. These unrelated cases involve distinct theories of liability that are patently different from the allegations and alleged theories of defect put forth by plaintiffs in the NexGen MDL. Moreover, the products at issue in these unrelated cases do not involve the same core discovery, documents, and witnesses as the NexGen Flex cases. Therefore, these cases would not benefit from coordination and would only complicate any coordinated proceeding, leading to unnecessary severance motions. For these reasons the Judicial Panel on Multidistrict Litigation did not include cases involving these other products in the Federal Court MDL. In order to avoid the delays and inefficiencies created by centralization of unrelated cases, Zimmer asks that these cases be excluded from any Centralization Order. A list of these unrelated NexGen cases is attached hereto as Exhibit B.

Zimmer also respectfully requests that the NexGen Flex cases identified in Exhibit A, and all future NexGen Flex cases of a similar nature, be coordinated in Middlesex County, because it is presently the least congested site for the administration of these cases in New Jersey. Middlesex County's central geographic location within the State also makes it convenient for the various parties, witnesses, and lawyers involved in this litigation. Indeed, many of the decision-makers on both sides of this litigation are located outside of New Jersey. If Middlesex County is unavailable, Zimmer requests coordination in Bergen County, which is also a geographically convenient and relatively uncongested venue. Given the current caseload in Atlantic County and its relative geographic isolation from the key parties, witnesses, and lawyers, Zimmer does not believe that Atlantic County is an appropriate venue for the coordination of these NexGen Flex cases.

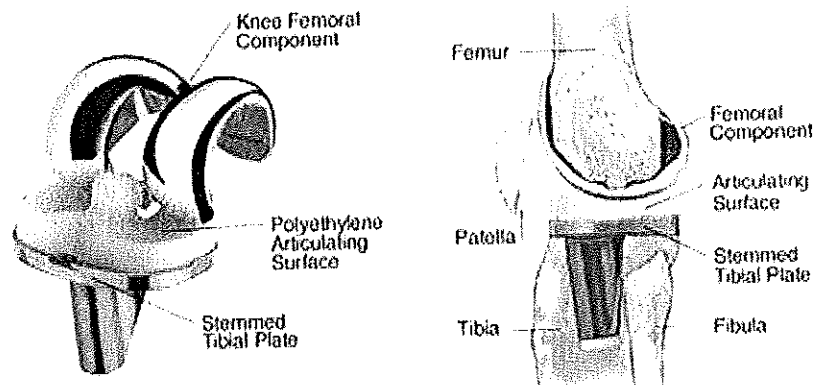
¹ The "MIS Total Knee Procedure Stemmed Tibial Component Fixed Bearing Precoat," is a single tibial plate also known as the MIS Tibia or "5950." It is referred to hereafter as the "MIS Tibia."

BACKGROUND

Zimmer develops, manufactures, and sells artificial knees, hips, and other orthopedic devices. Zimmer's leading knee replacement system is the NexGen® Knee Replacement System ("NexGen® Knee System"). Zimmer introduced the first NexGen® branded product in 1995 after more than two decades of experience with modern knee replacement products. Since that time, more than three million NexGen® Knee System components have been implanted in patients worldwide.

To be clear, "NexGen" refers not to a single product, but to over forty different products from which surgeons choose when replacing knees. To accommodate widely varying patient medical needs and orthopedic surgeons' different surgical philosophies, surgical and fixation techniques, and technical design preferences, Zimmer developed a range of distinct and varied knee replacement products that carry the NexGen® brand. A surgeon may implant one or more of these forty femoral, tibial, tibial articular surface, and patella components; however, only some of these products, namely the NexGen CR-Flex, LPS-Flex, and MIS Tibia components, are at issue in this litigation.

The NexGen Flex Femoral Components are used in connection with total knee replacement surgeries. During total knee replacement surgery, a surgeon removes the portions of the bones in the knee that are damaged and resurfaces the internal knee surfaces with plastic and metal implants. The implants are intended to help restore joint mobility and relieve pain. Every total knee prosthesis includes a tibial plate (or "tray"), a femoral component, a weight-bearing plastic insert between the two ("tibial insert" or "articulating surface"), and a patellar component. The tibial plate attaches to the top of the lower leg bone (tibia). The femoral component attaches to the bottom of the upper leg bone (femur). The articulating surface, made of high-grade polyethylene, snaps into the tibial tray and provides the surface on which the femoral component rotates or articulates. And, the patellar component replaces a patient's natural knee cap. See illustration below:



All of the plaintiffs in these pending lawsuits have allegedly undergone total knee replacement surgery with one or more NexGen® branded products, and all have allegedly experienced loosening as a result of certain alleged defects in the design and warnings associated with these products. Beginning in earnest in 2010, and continuing into 2011, Zimmer observed an increase in the number of lawsuits involving the NexGen Flex Femoral and MIS Tibia components.

In light of the increasing number of cases alleging NexGen LPS-Flex and MIS Tibia related injuries, on June 6, 2011, the plaintiffs' counsel in a matter pending in the Northern District of Illinois filed a petition for Multi-District Litigation with the Judicial Panel on Multi-District Litigation. On August 8, 2011, the Judicial Panel on Multi-District Litigation ordered the creation of Zimmer NexGen Knee Implant MDL. MDL-2272 - In Re: Zimmer NexGen Knee Implant Products Liability Litigation is now currently pending before Judge Rebecca R. Pallmeyer in the Northern District of Illinois. The Judicial Panel's Order establishing this MDL, however, specifically recognized that if "issues concerning one or more of these Zimmer components are sufficiently dissimilar, [then] the associated claims or cases should be remanded to their transferor districts, while pretrial proceedings as to other cases continue in the MDL." See Judicial Panel's Order at pages 2-3 (citing In re: DePuy Orthopaedics, Inc., Pinnacle Hip Implant Prods. Liab. Litig., — F. Supp. 2d —, 2011 WL 2132995, at *1 (J.P.M.L. May 23, 2011)).

Currently, there are approximately 133 cases pending in the NexGen MDL with an additional 43 awaiting transfer. An additional 19 cases have been filed in state courts across the country, including six NexGen Flex cases here in New Jersey, the first of which was filed in Essex County on December 8, 2010. An additional five related cases have been filed in New Jersey since this filing, all but one of which was filed in Atlantic County (and one in Passaic County). A detailed list of these NexGen Flex cases can be found at Exhibit A.

ARGUMENT

As detailed below, NexGen Flex litigation satisfies the criteria and factors for centralized case management outlined in the Directive #7-09 and the New Jersey Mass Tort (Non-Asbestos) Resource Book. Therefore, Zimmer respectfully requests that these cases be consolidated for case management in the Middlesex County Superior Court before the Honorable Jessica R. Mayer.

1. The NexGen Cases Meet the Criteria for Centralized Case Management

a. NexGen Involves a Large Number of Parties and Potential Cases

First, the NexGen Flex litigation has the potential to involve a large number of lawsuits. As outlined above, there are currently 133 cases pending in the NexGen MDL and over 19 state court cases involving the same allegations and components, including six here in New Jersey. Indeed, in seeking the MDL, Lead Counsel for the plaintiffs in the NexGen MDL told the Panel that the MDL likely will involve "over a thousand cases."

Additionally, numerous firms in New Jersey and over 100 firms nationally have run advertisements for NexGen plaintiffs. A search of the phrase "NexGen lawsuit" on the internet yields thousands of websites and attorney advertisements related to this litigation. This aggressive advertising campaign is designed to persuade implant recipients that NexGen® branded knee products suffer from defects that cause serious injuries. While Zimmer has attempted to correct many of these misstatements, until courts begin to resolve these issues on the merits, the advertisements will likely continue and will generate additional claims.

b. Certain NexGen Cases May Involve Common Issues of Law and Fact

Each of the complaints identified in Exhibit A is nearly identical and recites nearly indistinguishable allegations regarding the NexGen Flex Femoral Components. Moreover, the plaintiffs in each of these complaints allege the same general injuries and seek the same types of damages. Thus, based solely on the complaint allegations, common issues of law and fact predominate in these cases.

Moreover, the plaintiffs' allegations in these New Jersey cases are nearly identical to the complaints filed in the NexGen MDL. Zimmer anticipates that future cases will also follow this "cookie cutter" approach. Since these NexGen Flex cases rely on essentially identical legal theories and allegations, there may be a strong "value interdependence" between them, and rulings in each case will likely affect the perceived strength or weakness of these and similar lawsuits.

c. Dispersement of Parties and Remoteness of Counsel and Decision-Makers Support Centralized Management

All of the parties, witnesses, and counsel central to these NexGen Flex lawsuits are geographically dispersed and would benefit from centralization in an appropriate venue. For example, Zimmer, Inc., and Zimmer Holdings, Inc., are both headquartered, and maintain their principal place of business, in Warsaw, Indiana. Likewise, Zimmer Surgical, Inc., and Zimmer Orthobiologics, Inc., are also headquartered outside of New Jersey, in Dover, Ohio, and Austin, Texas,

respectively. Furthermore, the office of Zimmer's local counsel (the undersigned firm) is located in Essex County, and Zimmer's national counsel on these cases are located in Chicago, Illinois, and Indianapolis, Indiana.

Likewise, the plaintiffs and their counsel are geographically dispersed. The firms representing the plaintiffs in these cases are all located in either New York City or Northern New Jersey. Furthermore, as outlined in Exhibit A, all of the plaintiffs, except for one, reside in Northern New Jersey: either in Bergen, Passaic, or Sussex Counties. Given the widespread advertising by certain plaintiffs' firms, the geographical diversity of the parties will likely increase over time, making centralization essential to the efficient and fair management of this litigation.

d. Centralized Management Will Help Ensure Fairness and Limit Duplicative and Inconsistent Rulings

If these NexGen Flex cases are not managed in a coordinated manner from the start, there is a risk of inconsistent rulings and uneven procedural outcomes. With the NexGen MDL already in place, centralized case management will also help ensure that these cases proceed in a judicially efficient manner, reducing overall costs and conserving the resources of the parties, counsel, and judiciary.

Zimmer makes this application now, as these cases, like those of the NexGen MDL, are in their infancy, and discovery is only just beginning. Acting now will help ensure that duplicative and inconsistent rulings are minimized. Likewise, centralized management will assist the parties in proceeding in the most efficient and cost effective manner. Moreover, there will be little prejudice to any party, as these NexGen Flex cases have only just begun, and there has been no judicial involvement in the management of any of the cases currently pending in New Jersey.

e. Centralized Management Will Facilitate Discovery and Result in the Efficient Utilization of Judicial Resources

Centralized management will also help ensure fairness to all parties by limiting duplicative discovery and burdensome motion practice as these NexGen Flex cases move forward. If they are not centralized for management at the outset, there is a strong likelihood of inconsistent discovery rulings and duplicative motion practice. Moreover, centralized management will be convenient for the parties, as it will ensure that the defendants will not have to respond to duplicative demands for the production of documents and witnesses. Moreover, it is also expected that a number of expert witnesses will be retained to address various causation and damages issues. Coordination will help the efficient management of expert discovery and limit inconsistent rulings on important legal and evidentiary issues regarding proposed expert testimony.

f. There are Related Matters Pending in Federal Court

Finally, as noted above, there is already a pending MDL proceeding in place concerning these products. Centralized management will guarantee efficient coordination between a single experienced New Jersey mass tort judge and the NexGen MDL proceedings. This will advance judicial economy, help reduce the litigation management burdens of both plaintiffs and defendants, and reduce the overall costs and burdens of discovery. Judge Brian R. Martinotti recently confirmed this approach in the In re DePuy ASR™ Hip Implants Litigation, where he noted that New Jersey Courts are "committed to the coordination [of] litigation not only with the MDL but also with other jurisdictions." Judge Martinotti also noted that The New Jersey Mass Tort (non-asbestos) Resource Book, (3d. Ed.), November 2007, embraces this concept and states:

Coordination of Counsel in Related Litigation. If related litigation is pending in federal or other state courts, the judge should consider the feasibility of coordination among counsel in the various cases. It may be possible through consultation with other judges to bring about the designation of common committees or of counsel and to enter joint or parallel orders governing their function and compensation. Where this is not feasible, the judge may direct counsel to coordinate with the attorneys involved in the other cases to reduce duplication and potential conflicts and to further efficiency and economy through coordination and sharing of resources. In any event, it is desirable for the judges involved to exchange information and copies of orders that might affect proceedings in their courts. In approaching these matters, the court will want to consider the status of the respective cases (some may be close to trial while others are in their early stages), as well as the possibility that some later filed cases may have been filed in other courts by counsel seeking to gain a more prominent and lucrative role.

All of these factors weigh in favor of centralizing these NexGen Flex cases before a single experienced mass tort judge. Coordination will advance judicial economy, reduce the overall litigation management burdens, and promote the ends of justice.

2. Middlesex County is the Most Appropriate Current Venue for Centralization

When determining the proper venue for centralized case management, this Court considers a number of factors, including: (1) issues of fairness, (2) the geographical location of parties, witnesses, and attorneys, and (3) the existing civil and mass tort caseloads in the various venues. Zimmer submits that the balance of these factors clearly supports centralizing these cases in Middlesex County, as this venue

provides the most appropriate and convenient forum for the management of the NexGen litigation in New Jersey.

a. Middlesex County is the Most Appropriate Venue for the Centralized Management of These NexGen Flex Cases

As a threshold matter, a review of the existing civil and mass tort caseloads unquestionably supports the finding that Middlesex County is the proper forum for this NexGen Flex litigation. As the chart below indicates, Middlesex County is presently the least congested of the three mass tort vicinages in New Jersey, based on the current activity and status of the various litigations being managed in each venue.

Venue	Total Number of Mass Torts and Coordinated Proceedings (Non Asbestos)	Total Number of Active Mass Tort / Coordinated Cases (as of 10/11)	Number Recently Filed Mass Tort and Coordinated Cases (7/11-10/11)
Middlesex	6	3,806 (3,179 of which are from a single litigation)	78
Bergen	5	1,583	444
Atlantic	7	10,784	3,325

As outlined in the chart above, Middlesex County has seen by far the fewest mass tort filings over the past quarter. Only 78 new mass tort cases were filed in Middlesex County over the last three months, compared with well over 400 in Bergen County and over 3,000 in Atlantic County. See New Jersey Judiciary, CIVIL STATISTICS (October 2011), available at <http://www.judiciary.state.nj.us/quant/gray1110.pdf>. It is also important to note that while it appears that Middlesex County currently has more active cases than Bergen County, the vast majority of these cases (3,179) are from a single proceeding, the Risperdal/Seroquel/Zyprexa Litigation. As this Court is probably aware, a large portion of the Risperdal/Seroquel/Zyprexa cases are in the process of being resolved without further judicial intervention. Thus, Middlesex County's availability to handle this matter is actually more apparent than the numbers alone would suggest. Indeed, as existing mass torts litigations assigned to Middlesex County wind down, it is likely that there will be fewer than a thousand mass tort cases pending in Middlesex County by the beginning of 2012.

Middlesex County's geographic location also makes it an attractive venue for this litigation. Middlesex County is an ideal location for out-of-state defendants and counsel traveling to and from New Jersey. The Middlesex County Courthouse is less than 25 miles from Newark Liberty International Airport and is located minutes away from Amtrak's Northeast Corridor line, which provides direct train service to both New York and Philadelphia. As noted above, all of the primary Zimmer defendants reside outside New Jersey, as does Zimmer's national counsel. Centralizing these cases in a geographically convenient and accessible location is thus fair and warranted under the circumstances.

Plaintiffs will also benefit from Middlesex County's central location. As noted above, all of the parties and firms currently involved in this litigation are located in either Northern New Jersey or New York City. Thus, Middlesex County is an equally convenient venue from a geographical perspective for all involved in this litigation.

b. Bergen County is the Second Most Appropriate Venue for the Centralized Management of These Cases

Zimmer also believes that Bergen County would be an appropriate venue for this litigation. Indeed, Bergen County shares many of the geographic benefits of Middlesex County. That being said, the mass torts currently being managed in Bergen County are far more active than those in Middlesex County. Moreover, the County has had more than triple the mass tort filings over the past four months and the possibility for a number of bellwether trials in 2012.

For example, the In re Yaz/Yasmin/Ocella Litigation is currently very active, with bellwether discovery set to close on January 23, 2012. Likewise, the Nuvaring Litigation is also very active with a number of important expert issues, including Kemp motions, to be addressed over the next year. Finally, Bergen County is also managing the In re DePuy ASR™ Hip Implants Litigation, which was centralized for case management purposes on April 12, 2011 and now involves over 193 cases, many of which were only just filed.

c. Atlantic County is the Least Appropriate Venue for the Centralized Management of These Cases

As the chart above demonstrates, Atlantic County has by far the greatest number of active mass tort proceedings. Indeed, it is currently managing over three times the number of cases as either of the other two available vicinages. Moreover, many of these proceedings are quite young and active. Indeed, four of the seven mass tort litigations currently pending in Atlantic County were designated within the last two years and over the past few months there have been over 3,000 new mass tort cases filed in Atlantic County. Given the overall docket congestion and activity, Zimmer believes centralization of the NexGen Flex litigation is inappropriate in Atlantic County.

It is also important to note that none of the parties, witnesses, or firms involved in this litigation are from Atlantic County. Indeed, the mere fact that these NexGen Flex cases are currently pending in Atlantic County is of little concern to this Court's current analysis, because there has been no management of these cases to date by the Atlantic County Court. Atlantic County is not any more familiar with these cases than any of the other available vicinages. Likewise, plaintiffs' initial filing choice is not one of the factors this Court has identified as relevant to the choice of a proper forum for mass tort coordination in either Directive #7-09 or the New Jersey Mass Tort (Non-Asbestos) Resource Book.

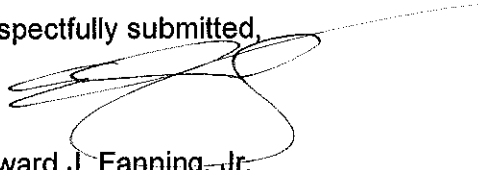
Finally, Atlantic County is also the most inconvenient venue geographically for the coordination of this litigation for all parties involved, especially for Zimmer, whose offices, witnesses, and national counsel all reside outside of New Jersey. Atlantic County is located over 100 miles from Newark Liberty International Airport and over 60 miles from Philadelphia International Airport. In light of the County's location and the nature of the parties involved in this litigation, as well as the existing case load, the likely availability of judicial resources, and in the interest of justice, Atlantic County is not an appropriate forum for this litigation.

CONCLUSION

For the foregoing reasons, Zimmer submits that the NexGen Flex cases identified in Exhibit A and any subsequent similar cases filed in New Jersey that meet the definition of a NexGen Flex case, as outlined above, should be consolidated for case management in the Middlesex County Superior Court.

Furthermore, all parties are hereby notified that this application will be sent by the Acting Administrative Director of New Jersey Courts to all Assignment Judges and Civil Presiding Judges and will be published by the Acting Administrative Director in the legal newspapers and Judiciary's website providing information on where and within what time period comments on and objection to this application can be made.

Respectfully submitted,



Edward J. Fanning, Jr.

cc: Hon. Carol E. Higbee, J.S.C.
Hon. Nelson C. Johnson, J.S.C.
Hon. Garry S. Rothstadt, J.S.C.
Peter Samberg, Esq.
Ellen Relkin, Esq.
Samuel L. Davis, Esq.
Brian C. Harris, Esq.

Exhibit A

PENDING NEXGEN FLEX LAWSUITS IN NEW JERSEY THAT REQUIRE COORDINATION

Case Name/	Docket Number	Product At Issue	Plaintiff(s) Residence	Firm Representing Plaintiff(s)
Brancati, Cole v. Zimmer Holdings, Inc.; Zimmer, Inc.; Zimmer Tri-State; Zimmer Orthopaedic Surgical Products, Inc.; Zimmer Orthobiologics, Inc. and John Does 1 through 5	ATL-L-8768-11	LPS Flex Femoral	Montrose, CO (resident of Mendham, New Jersey at time of surgery)	Weitz & Luxenberg, P.C; Cherry Hill, NJ/ New York, NY
Campanioni, Sophie v. Zimmer Holdings, Inc.; Zimmer Tri-State; Zimmer Orthopaedic Surgical Products, Inc.; Zimmer Orthobiologics, Inc. and John Does 1 through 5	ATL-L-3598-11	LPS Flex Femoral	Oradell, Bergen County, NJ	Weitz & Luxenberg, P.C; Cherry Hill, NJ/ New York, NY
Flood, Susan and Wayne v. Zimmer, Inc.; Zmmer Holdings, Inc.; Wilson/Phillips Holdings, Inc. a/k/a Zimmer Wilson Phillips; Zimmer Orthopaedic Surgical Products, Inc.; Zimmer Orthobiologics, Inc.; and John Does 1-5	ATL-L-4778-11 (Case is listed as closed on Atlantic County Court Docket, despite Essex County Transfer Order dated 7/10/11)	LPS Flex Femoral	Sussex, Sussex County, NJ	Weitz & Luxenberg, P.C; Cherry Hill, NJ/ New York, NY
Jenkins, Janice and Michael v. Mark A. Hartzband, M.D., John Doe 1-10 and/or XYZ Corp. 1-10; Zimmer and/or ABC Corp. 1-10, Roe Does 110 and/or GHI Corps. 1-10)	PAS-L-3014-11	Hi-Flex Femoral	Pompton Lakes, Passaic County, NJ	Braff, Harris and Sukoneck; Livingston, NJ/New York, NY
Lemke, Susan v. Zimmer Holdings, Inc.; Zimmer Tri-State; Zimmer Orthopaedic Surgical Products, Inc.; Zimmer Orthobiologics, Inc. and John Does 1 through 5	ATL-L-3587-11	MIS Tibia	Hasbrouck Heights, Bergen County, NJ	Weitz & Luxenberg, P.C; Cherry Hill, NJ/ New York, NY

Case Name/	Docket Number	Product At Issue	Plaintiff(s) Residence	Firm Representing Plaintiff(s)
Res, Peter and Barbara v. Zimmer Holdings, Inc.; Zimmer, Inc.; Zimmer Tri-State; Zimmer Orthopaedic Surgical Products, Inc.; Zimmer Orthobiologics, Inc. and John Does 1 through 5	ATL-L-9099-11	LPS Flex Femoral	Old Tappan, Bergen County, NJ	Davis, Saperstein & Salomon, P.C.; Teneck, NJ/New York, NY

Exhibit B

**OTHER CASES PENDING IN NEW JERSEY THAT INVOLVE NEXGEN
BRANDED PRODUCTS, WHICH ARE
UNRELATED TO MDL**

Case Name/ Docket Number

Brotherton, Glen v. Zimmer Holdings, Inc.; Zimmer Tri-State; Zimmer Orthopaedic Surgical Products, Inc.; Zimmer Orthobiologics, Inc. and John Does 1 through 5
ATL-L-3592-11

Di Maria, Angela and John v. Zimmer Holdings, Inc.; Zimmer Tri-State; Zimmer Orthopaedic Surgical Products, Inc.; Zimmer Orthobiologics, Inc. and John Does 1 through 5
ATL-L-3595-11