

RIKER DANZIG LLP  
Headquarters Plaza  
One Speedwell Avenue  
Morristown, NJ 07962-1981  
(973) 538-0800

Attorneys for Defendants,  
Ethicon, Inc. and Johnson & Johnson

**FILED**  
APR 12 2024  
GREGG A. PADOVANO, J.S.C.

REYNA PERALES,

Plaintiff,

vs.

ETHICON, INC., et als,

Defendants.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION – BERGEN COUNTY  
DOCKET NO. BER-L-013888-14 MCL

MASTER DOCKET NO. BER-L-11575-14  
INDIVIDUAL DOCKET NO. BER-L-2235-23

CIVIL ACTION

In Re Pelvic Mesh/Gynecare Litigation,  
Case No. 291

**ORDER REGARDING WITHDRAWAL  
OF COUNSEL, MAINTENANCE OF  
CLAIMS AND POTENTIAL DISMISSAL  
OF COMPLAINT**

**THIS MATTER** having been opened to the Court by Schroeder Law Office, PLLC attorneys for Plaintiff, to be relieved as counsel, and the court having considered the matter and for good cause shown,

IT IS on this 12<sup>TH</sup> day of APRIL ~~March~~ 2024, **ORDERED** as follows:

1. Schroeder Law Office, PLLC, as well as Sheila M. Bossier Esq., and Laurel Li Harris Esq., of Bossier & Associates, PLLC, are hereby relieved as counsel for Plaintiff subject to the additional provisions of this Order.
2. Counsel for Plaintiff shall serve a copy of this Order on Plaintiff at the following last known address:

Ms. Reyna Perales  
7616 McWhorther Place, Apt. 204  
Annandale, VA 22003

and upon counsel for Defendants, and shall submit via JEDS a Certification of such service within 10 days of the date of this Order.

3. Plaintiff shall have 40 days from the date of this Order to notify the Court in writing that she either has new counsel or intends to prosecute the case *pro se* (without an attorney).

The writing shall be addressed to:

The Honorable Gregg A. Padovano, J.S.C.  
Superior Court of New Jersey  
Bergen County Courthouse – 3<sup>rd</sup> Floor Rotunda  
10 Main Street  
Hackensack, NJ 07601

And the written notice must be received by the Court within the 40-day window period.

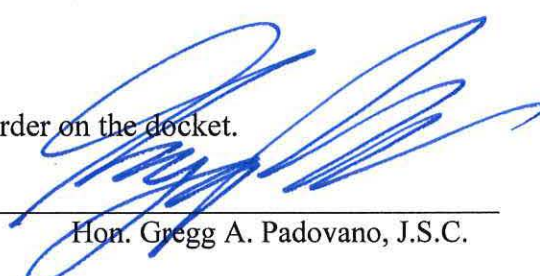
4. A copy of the notice shall also be sent to counsel for the Defendants at:

Kelly Crawford, Esq.  
Riker Danzig, LLP  
Headquarters Plaza  
One Speedwell Avenue  
Morristown, NJ 07960

5. If the Court does not receive the notice within the 40-day period the Complaint will be deemed dismissed without prejudice as to all defendants. Counsel for the Defendants may submit a proposed Order to that effect without further notice to the Plaintiff.
6. If Plaintiff's Complaint is dismissed without prejudice under the terms of this order, plaintiff may move to reinstate the complaint within 60 days from the date of the order dismissing without prejudice. If no motion to reinstate is filed by that date, then counsel

for Defendant may submit an Order to convert the dismissal to a dismissal with prejudice, without further notice to the plaintiff.

The Court **DIRECTS** the Clerk to file a copy of this order on the docket.



---

Hon. Gregg A. Padovano, J.S.C.

**CONSENTED TO AS TO FORM AND ENTRY:**

/s/ Karen H. Beyea-Schroeder<sup>1</sup>  
Karen Beyea-Schroeder, Esq.  
Schroeder Law Office, PLLC  
62 Candle Pine Pl  
The Woodlands, TX 77381  
Telephone (832) 585-9829  
E-mail: [Karen.Schroeder@Schroeder-LawOffice.com](mailto:Karen.Schroeder@Schroeder-LawOffice.com)

*Counsel for Plaintiff*

/s/ Kelly S. Crawford<sup>1</sup>  
Kelly S. Crawford, Esq.  
Riker Danzig LLP  
Headquarters Plaza  
One Speedwell Avenue  
Morristown, NJ 07962  
[kcrawford@riker.com](mailto:kcrawford@riker.com)

*Counsel for Defendants  
Ethicon, Inc., & Johnson & Johnson*

Dated: March 26, 2024

---

<sup>1</sup> Pursuant to the New Jersey Supreme Court Omnibus Order on Covid-19 issues entered on March 27, 2020, "The provisions of Rule 1:32-2A(c) and all other Court Rules requiring original signatures on filings are relaxed and supplemented so as to permit electronic signatures to be used in all filing processes temporarily authorized to be used during the COVID-19 crisis, including, but not limited to emergent applications submitted by email and hardcopy submissions in dockets without an approved electronic filing system..."