

# **EXHIBIT A**


**Service of Process  
Transmittal**

02/25/2022

CT Log Number 541121276

**TO:** Ra-Jjcus Ldsop  
JOHNSON & JOHNSON  
1 Johnson and Johnson Plz  
New Brunswick, NJ 08933-0002

**RE: Process Served in Connecticut**

**FOR:** Ethicon, Inc. (Domestic State: NJ)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Re: SCOTT BENDER // To: Ethicon, Inc.

**DOCUMENT(S) SERVED:** Summons, Complaint, Attachment(s)

**COURT/AGENCY:** Stamford Superior Court, CT  
Case # NONE

**NATURE OF ACTION:** Product Liability Litigation - Personal Injury - Linx

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, East Hartford, CT

**DATE AND HOUR OF SERVICE:** By Process Server on 02/25/2022 at 15:08

**JURISDICTION SERVED :** Connecticut

**APPEARANCE OR ANSWER DUE:** On or before the second day after the return date 03/29/2022

**ATTORNEY(S) / SENDER(S):** Brenden P. Leydon  
Wocl Leydon LLC  
80 Fourth Street  
Stamford, CT 06905  
203-333-3339

**ACTION ITEMS:** CT has retained the current log, Retain Date: 02/25/2022, Expected Purge Date: 03/02/2022

Image SOP

Email Notification, Ra-Jjcus Ldsop RA-JJCUS-LDSOP@its.jnj.com

Email Notification, Dasia Abram dabram2@its.jnj.com

**REGISTERED AGENT ADDRESS:** C T Corporation System  
67 Burnside Ave  
East Hartford, CT 06108  
855-844-0739  
ServiceSolutionsTeam@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

SERVICE INTENDED FOR:

**Ethicon, Inc.**



**SUMMONS - CIVIL**

JD-CV-1 Rev. 2-22

C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259;

P.B. §§ 3-1 through 3-21, 8-1, 10-13

For information on  
ADA accommodations,  
contact a court clerk or  
go to: [www.jud.ct.gov/ADA](http://www.jud.ct.gov/ADA).

STATE OF CONNECTICUT  
**SUPERIOR COURT**

[www.jud.ct.gov](http://www.jud.ct.gov)**Instructions are on page 2.**

- ☐ Select if amount, legal interest, or property in demand, not including interest and costs, is LESS than \$2,500.
- ☒ Select if amount, legal interest, or property in demand, not including interest and costs, is \$2,500 or MORE.
- ☐ Select if claiming other relief in addition to, or in place of, money or damages.

**TO: Any proper officer**

By authority of the State of Connecticut, you are hereby commanded to make due and legal service of this summons and attached complaint.

Address of court clerk (Number, street, town and zip code)

123 HOYT STREET, STAMFORD CT 06905

Telephone number of clerk

(203) 965 - 5308

Return Date (Must be a Tuesday)

03/29/2022

☒ Judicial District

G.A.

At (City/Town)

Case type code (See list on page 2)

☐ Housing Session☐ Number: \_\_\_\_\_

STAMFORD

Major: T

Minor: 20

**For the plaintiff(s) enter the appearance of:**

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code)

WOCL LEYDON LLC, 80 FOURTH STREET, STAMFORD CT 06905

Juris number (if attorney or law firm)

106151

Telephone number

(203) 333 - 3339

Signature of plaintiff (if self-represented)

The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book.

☒ Yes ☐ No

E-mail address for delivery of papers under Section 10-13 of the Connecticut Practice Book (if agreed)

bleydon@woclleymon.com

Parties	Name (Last, First, Middle Initial) and address of each party (Number, street, P.O. Box, town, state, zip, country, if not USA)	
First plaintiff	Name: BENDER, SCOTT Address: 61 LIBERTY STREET, WILTON, CT 06887	P-01
Additional plaintiff	Name: Address:	P-02
First defendant	Name: TORAX MEDICAL, INC., 4188 LEXINGTON AVE, SHOREVIEW MN 55126 Address: C/O SECRETARY OF THE CORPORATION, 4188 LEXINGTON AVE, SHOREVIEW MN 55126	D-01
Additional defendant	Name: ETHICON, INC., U.S. ROUTE 22, SOMERVILLE NJ 08876 Address: AGENT FOR SERVICE: CT CORPORATION SYSTEM, 67 BURNSIDE AVE, EAST HARTFORD CT 06108	D-02
Additional defendant	Name: Address:	D-03
Additional defendant	Name: Address:	D-04
Total number of plaintiffs: 1		Total number of defendants: 2
		<input type="checkbox"/> Form JD-CV-2 attached for additional parties

**Notice to each defendant**

- You are being sued.** This is a summons in a lawsuit. The complaint attached states the claims the plaintiff is making against you.
- To receive further notices, you or your attorney must file an *Appearance* (form JD-CL-12) with the clerk at the address above. Generally, it must be filed on or before the second day after the Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to appear.
- If you or your attorney do not file an *Appearance* on time, a default judgment may be entered against you. You can get an *Appearance* form at the court address above, or on-line at <https://jud.ct.gov/webforms/>.
- If you believe that you have insurance that may cover the claim being made against you in this lawsuit, you should immediately contact your insurance representative. Other actions you may take are described in the Connecticut Practice Book, which may be found in a superior court law library or on-line at <https://www.jud.ct.gov/pb.htm>.
- If you have questions about the summons and complaint, you should talk to an attorney.

**The court staff is not allowed to give advice on legal matters.**

Date 02/24/2022	Signed (Sign and select proper box) 	<input checked="" type="checkbox"/> Commissioner of Superior Court <input type="checkbox"/> Clerk	Name of person signing BRENDEN P. LEYDON, ESQ.
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If this summons is signed by a Clerk:

- The signing has been done so that the plaintiff(s) will not be denied access to the courts.
- It is the responsibility of the plaintiff(s) to ensure that service is made in the manner provided by law.
- The court staff is not permitted to give any legal advice in connection with any lawsuit.
- The Clerk signing this summons at the request of the plaintiff(s) is not responsible in any way for any errors or omissions in the summons, any allegations contained in the complaint, or the service of the summons or complaint.

For Court Use Only

File Date

I certify I have read and Signed (Self-represented plaintiff)

**A TRUE COPY**  
**ATTEST:**

Date

Docket Number

RETURN DATE: MARCH 29, 2022 : SUPERIOR COURT  
SCOTT BENDER : J.D. OF STAMFORD/NORWALK  
VS. : AT STAMFORD  
TORAX MEDICAL, INC.; ETHICON, INC. : FEBRUARY 24, 2022

### COMPLAINT

Defendants Torax Medical, Inc. and Ethicon, Inc. manufactured a defective medical device such that Plaintiff suffered significant injury. Here, a defectively manufactured LINX was surgically implanted in Plaintiff to control his gastroesophageal reflux disease (GERD). After the LINX was implanted in Plaintiff, Defendants became aware of the manufacturing defect in Plaintiff's LINX. Defendants recalled Plaintiff's LINX as well as numerous other LINX devices in the United States and European Union. Moreover, the recall notice refers to an out of specification condition of the device indicating the device was defectively manufactured.

### THE PARTIES

1. At all times material Plaintiff Scott Bender was a resident of Connecticut.
2. Defendant **Ethicon, Inc.** ("Ethicon") is a New Jersey corporation with its headquarters and principal place of business located at One Johnson & Johnson Plaza, New Brunswick, New Jersey 08933. Ethicon's medical devices, including the LINX, are distributed, marketed, sold, and used on medical patients in all fifty United States, including Connecticut and Colorado, and the European Union.
3. At all times material, Defendant Ethicon Inc. was a wholly owned subsidiary of Johnson & Johnson.
4. Defendant **Torax Medical, Inc.** ("Torax") is a Delaware corporation with its headquarters and principal place of business located at 4188 Lexington Avenue, Shoreview,



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