

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: COVIDIEN HERNIA MESH
PRODUCTS LIABILITY LITIGATION
NO. II,

This Document Relates To:

Rick D. Jenne

MDL No. 1:22-md-03029-PBS

SHORT FORM COMPLAINT

Plaintiff(s) file(s) this Short Form Complaint pursuant to Case Management Order No. 7 and is to be bound by the rights, protections, and privileges and obligations of that Order. Plaintiff(s) hereby incorporate(s) the Master Complaint in MDL No. 3029 by reference. Plaintiff(s) further show(s) the Court as follows:

1. The name of Plaintiff/the person implanted with Defendants' Hernia Mesh Device(s):

Rick D. Jenne

2. The name of any Consortium Plaintiff (if applicable):

n/a

3. Other Plaintiff(s) and Capacity (i.e., administrator, executor, guardian, conservator):

n/a

4. Current State of Residence:

New York

5. District Court and Division in which action would have been filed absent direct filing:

U.S. District Court NDNY

6. Defendants (Check Defendants against whom Complaint is made):

A. Covidien LP

B. Sofradim Production SAS

C. Other (please list: _____)

7. Identify which of Defendants' Hernia Mesh Device(s) was/were implanted (Check all device(s) implanted):

- Dextile Anatomical Mesh
- Parietene DS Mesh
- Parietene Polypropylene Mesh
- Parietene ProGrip Mesh
- Parietex Composite Mesh
- Parietex Composite Mono PM Mesh
- Parietex Composite PCO-OS or PCO-OB Mesh
- Parietex Composite Ventral Patch
- Parietex Hydrophilic 2D Mesh
- Parietex Hydrophilic 3D Mesh
- Parietex Hydrophilic Anatomical Mesh
- Parietex Monofilament Polyester Mesh
- Parietex Optimized Composite Mesh
- Parietex Plug & Patch
- Parietex ProGrip
- ProGrip Laparoscopic
- SurgiPro
- SurgiPro Plug & Patch
- Symbotex Composite Mesh
- Other (please list in space provided below):

8. Defendants' Hernia Mesh Device(s) about which Plaintiff is making a claim (Check all applicable device(s)):

- Dextile Anatomical Mesh
- Parietene DS Mesh
- Parietene Polypropylene Mesh
- Parietene ProGrip Mesh
- Parietex Composite Mesh
- Parietex Composite Mono PM Mesh
- Parietex Composite PCO-OS or PCO-OB Mesh
- Parietex Composite Ventral Patch
- Parietex Hydrophilic 2D Mesh
- Parietex Hydrophilic 3D Mesh
- Parietex Hydrophilic Anatomical Mesh
- Parietex Monofilament Polyester Mesh
- Parietex Optimized Composite Mesh
- Parietex Plug & Patch
- Parietex ProGrip
- ProGrip Laparoscopic
- SurgiPro
- SurgiPro Plug & Patch
- Symbotex Composite Mesh
- Other (please list in space provided below):

9. Date of Implantation and State of Implantation (if multiple devices, list date of implantation for each device and list the device implanted on such date):

5/15/2019 (New York)

10. As of the date of filing this Short Form Complaint, has the person implanted with Defendants' Hernia Mesh Device(s) had subsequent surgical intervention due to the Hernia Mesh Device(s)?: Yes X No _____

11. Basis of Jurisdiction:

- Diversity of Citizenship
- Other: _____

12. Counts in the Master Complaint adopted by Plaintiff(s):

- Count I – Strict Product Liability- Defective Design
- Count II – Strict Product Liability- Failure to Warn
- Count III – Strict Product Liability- Manufacturing Defect
- Count IV– Negligence
- Count V– Negligence Per Se
- Count VI– Gross Negligence
- Count VII – State Consumer Protection Laws (Please identify applicable State Consumer Protection law(s)):
NYS Gen Business Law, Section 349 et seq.

- Count VIII – Breach of Implied Warranty
- Count IX – Breach of Express Warranty
- Count X – Negligent Infliction of Emotional Distress
- Count XI – Intentional Infliction of Emotional Distress
- Count XII – Negligent Misrepresentation
- Count XIII – Fraud and Fraudulent Misrepresentation

- Count XIV – Fraudulent Concealment
- Count XV – Wrongful Death
- Count XVI – Loss of Consortium
- Count XVII – Punitive Damages
- Other Count(s) (please identify and state factual and legal bases for other claims not included in the Master Complaint below):

-
- Jury Trial is Demanded as to All Counts
 - Jury Trial is NOT Demanded as to All Counts; if Jury Trial is Demanded as to Any Count(s), identify which ones (list below):
-

Respectfully submitted,

/s/ Rosemarie Riddell Bogdan
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Attorneys for Plaintiff

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Rick D. Jenne

(b) County of Residence of First Listed Plaintiff Saratoga, NY (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Harding Mazzotti, LLP 1 Wall St., Albany, NY 12205 (518) 862-1200

DEFENDANTS

Covidien LP and Sofradim Production SAS

County of Residence of First Listed Defendant Bristol County, MA (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location (Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation).

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 USC 1332

Brief description of cause: personal injuries due to defective product

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$

CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE Hon. Patti B. Saris

DOCKET NUMBER 1:22-md-03029-PBS

DATE 01/06/2026 SIGNATURE OF ATTORNEY OF RECORD /s/ Rosemarie Riddell Bogdan

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

1. Title of case (name of first party on each side only) Rick D. Jenne v. Covidien LP, et al.

2. Category in which the case belongs based upon the numbered nature of suit code listed on the civil cover sheet. (See local rule 40.1(a)(1)).

- I. 160, 400, 410, 441, 535, 830*, 835*, 850, 880, 891, 893, R.23, REGARDLESS OF NATURE OF SUIT.
- II. 110, 130, 190, 196, 370, 375, 376, 440, 442, 443, 445, 446, 448, 470, 751, 820*, 840*, 895, 896, 899.
- III. 120, 140, 150, 151, 152, 153, 195, 210, 220, 230, 240, 245, 290, 310, 315, 320, 330, 340, 345, 350, 355, 360, 362, 365, 367, 368, 371, 380, 385, 422, 423, 430, 450, 460, 462, 463, 465, 480, 485, 490, 510, 530, 540, 550, 555, 560, 625, 690, 710, 720, 740, 790, 791, 861-865, 870, 871, 890, 950.
*Also complete AO 120 or AO 121. for patent, trademark or copyright cases.

3. Title and number, if any, of related cases. (See local rule 40.1(g)). If more than one prior related case has been filed in this district please indicate the title and number of the first filed case in this court.

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4. Has a prior action between the same parties and based on the same claim ever been filed in this court?
YES NO

5. Does the complaint in this case question the constitutionality of an act of congress affecting the public interest? (See 28 USC §2403)

YES NO

If so, is the U.S.A. or an officer, agent or employee of the U.S. a party?

YES NO

6. Is this case required to be heard and determined by a district court of three judges pursuant to title 28 USC §2284?

YES NO

7. Do all of the parties in this action, excluding governmental agencies of the United States and the Commonwealth of Massachusetts ("governmental agencies"), residing in Massachusetts reside in the same division? - (See Local Rule 40.1(d)).

YES NO

A. If yes, in which division do all of the non-governmental parties reside?

Eastern Division Central Division Western Division

B. If no, in which division do the majority of the plaintiffs or the only parties, excluding governmental agencies, residing in Massachusetts reside?

Eastern Division Central Division Western Division

8. If filing a Notice of Removal - are there any motions pending in the state court requiring the attention of this Court? (If yes, submit a separate sheet identifying the motions)

YES NO

(PLEASE TYPE OR PRINT)

ATTORNEY'S NAME Rosemarie Riddell Bogdan, Harding Mazzotti, LLP

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