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JURIS NUMBER 412801

RETURN DATE: May 9, 2023	**:**	**SUPERIOR COURT**
KASANDRA WALSH HANNAH LAMB KYENNA HAMILTON CRYSTAL STEWART LORETTA FERRIS SHANTAIL THOMAS MEGAN REHAHN ANGELA BLAHNIK MELISSA WATTERS STEPHANIE MENDEZ SARA VANKAMPEN		
	:	**J.D. OF FAIRFIELD**
V.	**:**	**AT BRIDGEPORT**
COOPERSURGICAL, INC., COOPER COMPANIES, INC., FEMCARE, LTD. – UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC., and UTAH MEDICAL PRODUCTS, INC.	**:**	**APRIL 3, 2023**

COMPLAINT

I. INTRODUCTION

The Plaintiffs, Kasandra Walsh, Hannah Lamb, Kyenna Hamilton, Crystal Stewart, Loretta Ferris, Shantail Thomas, Megan Rehahn, Angela Blahnik, Melissa Watters, Stephanie Mendez, and Sara VanKampen were implanted with a female birth control device known as a "Filshie Clip." In short, this device is intended to cause bilateral occlusion (blockage) of the fallopian tubes by applying a clip onto the fallopian tubes which then anchors and elicits tissue growth, theoretically causing a closure of the tubes. However, in reality, the clips migrate from the tubes wreaking havoc on the female body. Filshie Clips are part of the "Filshie® Tubal ligation System" for laparoscopic tubal ligation, which involves applying a titanium clip with silicone rubber lining around each of the fallopian tubes. The Filshie Clip works by exerting

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continued pressure on the fallopian tube, causing avascularization for the 3 to 5 mm area it encompasses. The silicone continues this pressure even after necrosis starts and the fallopian tube decreases in size. Fibrosis then occurs, and the clip is peritonealized if all goes as planned. Defendants' disposable delivery system consists of an applicator which allows insertion into the women's body to allow the clip to be snapped onto the fallopian tube. A women's choice of birth control is a deeply personal decision, particularly when choosing a long-acting form of birth control like a tubal ligation which should permanently alter a women's body.

On September 5, 1996, Femcare, the manufacturer of the Filshie Clip, obtained Conditional Premarket Approval ("PMA") by the Food and Drug Administration ("FDA") (PMA number P920046). Filshie Clips are classified as a Class III medical device by the FDA. Class III medical devices are those that either "present a potential unreasonable risk of illness or injury or are for a use in supporting or sustaining human life or for a use which is of substantial importance in preventing impairment of human health." 21 U.S.C. § 360c (1)(c). Because they are a Class III medical device, the FDA evaluated Filshie Clips' safety and effectiveness prior to granting the product conditional approval. At that time, the FDA authorized its commercial distribution. Such approval was contingent upon the FDA's finding that there was "a reasonable assurance" of the device's safety and effectiveness. However, the PMA imposed certain conditions on the sale of the product, including certain labeling and reporting requirements, and restrictions on false or misleading advertising.

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At all times mentioned herein, the FDA requires the manufacturers, importers, sellers, and distributors of Class III medical devices to adhere to federal regulations to ensure the safety of the public who uses such devices. Defendants are under a continuing duty to adhere to specific conditions imposed on the Filshie Clips at the time of approval, to monitor its product after premarket approval, and to report to the FDA any adverse events of which they became aware and that are or may be attributable to the product. At all times mentioned herein, defendant, Femcare, is the manufacturer of the Filshie Clip system and it also obtained FDA approval for the sale of the Filshie Clips in the United States in 1996.

On or about October 27, 2003, defendant, Femcare entered into a distribution agreement with defendant, CooperSurgical, where said defendant, CooperSurgical would be the exclusive importer and distributor of Filshie Clips in the United States. The defendant, Cooper Companies, is defendant, CooperSurgical's parent company. Until 2019, defendant, CooperSurgical imported, distributed, marketed, and sold the Filshie Clip system in the United States. From 2019 to the present day, the defendant, Utah Medical exclusively imports, sells, distributes, and markets the Filshie Clips in the United States, including Connecticut. In 2011, defendant, Utah Medical also acquired defendant, Femcare, and became its parent company. Since acquisition, defendant, Utah Medical began to assume a larger role in the manufacturing, marketing, distribution, and selling of Filshie Clips. The defendants, singularly and in combination, designed, manufactured, sold and distributed Filshie Clips and related equipment utilized in the plaintiffs' tubal ligations. For years, the defendants intentionally manufactured, sold, and distributed Filshie Clips to the public as a quick, easy, and simple form of sterilization. The

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defendants told women they could use Filshie Clips to effectively prevent pregnancy while the product was in place and that the product was safe. The defendants' representations were false.

It should go without saying that it is of the utmost importance that women know all risks associated with a particular type of birth control given that a woman's choice of birth control can have long-term consequences on her health. Filshie Clips pose significant health risk, and the product has subjected untold thousands of women to significant injuries. These injuries stem from the simple fact that Filshie Clips have a propensity to migrate after being placed on the fallopian tubes. Migration of the clips following a normal application is estimated to occur over 25% of the time. The pathophysiology is related to the speed at which peritoneal-like tissue forms over the clip anchoring it to the fallopian tube. The migration of the clip often requires surgical intervention to remove the Filshie Clips from the woman's body. The defendants neither warned nor adequately informed the plaintiffs nor their healthcare providers how frequently these migrations occur or the severity and permanency of the potential injuries even though the defendants had received adverse reports and knew or should have known Filshie Clips had a significant propensity to migrate.

Women and their doctors depend on the defendants, the manufacturers, and distributors of products like Filshie Clips, to be forthcoming about the safety and risks of Filshie Clips. This reliance on the defendants was warranted. The regulatory scheme that governs Filshie Clips is premised on a system whereby the manufacturer is responsible for reporting relevant safety

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information to the public. The onus is on the manufacturer to come forward with any safety risks because the public and the FDA would otherwise have no insight of adverse events.

The plaintiffs have suffered as a result of the defendants' failure to report adverse events involving the Filshie Clip. That failure violated requirements imposed by the FDA. However, the risk of clip migration was significantly higher and continued to increase since the initial PMA. Despite these increases, the defendants failed to address the Filshie Clips safety issues, even though adverse event reports did or should have alerted them to a product defect causing the device to cause injuries. Despite having knowledge of an approximately two-hundred-fold increased risk of migration over the reported .13%, and rather than inform of such risk, the defendants, CooperSurgical, Cooper Companies, Femcare, and Utah Medical tout the benefits of the Filshie Clip version of the bilateral tubal ligation procedure over other available procedures. As noted in the press release regarding the Femcare, Ltd. purchase, the Filshie Clip System was claimed to be "safer than electrocautery and the newer hysteroscopic devices" without mention of the risk of migration associated with the clips.

The defendants had a duty to act as reasonable manufacturers and distributors of medical devices. They had a duty to continually monitor their product, including, but not limited to, its design, manufacturing, performance, safety profile, and labeling. They had a duty to continually test their product and ensure it was safe and would perform as intended. Yet the defendants breached their duties and, as a result, the plaintiffs were injured. The knowledge defendants have regarding the migration issues involved with the Filshie Clip Systems not only triggers

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responsibility under Connecticut law for product liability, they also imposed parallel duties on the defendants pursuant to the Food, Drug, and Cosmetic Act ("FDCA") to accurately report and update the FDA of the same. These duties, both under applicable Connecticut state law and the FDCA, are substantially similar. The Connecticut state law does not impose a higher standard than the FDCA. If the defendants had timely disclosed the propensity and severity of risks associated with use of the Filshie Clips, the plaintiffs' injuries could have been avoided. Instead, the defendants did nothing, and for that, the plaintiffs here seek redress both to compensate them for their losses and to strongly deter future, similar misconduct.

FIRST COUNT (KASANDRA WALSH v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff, Kasandra Walsh, was and is a resident of Battle Ground, Washington.

2. At all times mentioned herein, the defendant, CooperSurgical, Inc. (hereinafter referred to as CooperSurgical) was and is a Delaware corporation duly authorized to transact business in Connecticut with its principal place of business located at 75 Corporate Drive in Trumbull, Connecticut.

3. At all times mentioned herein, the defendant, Cooper Companies, Inc., (hereinafter referred to as Cooper Companies), was and is a Delaware corporation and the alter ego and parent company of CooperSurgical, with its principal place of business located at 6101 Bollinger Canyon Road, San Ramon, California, and was and is doing business in Connecticut.

4. At all times mentioned herein, the defendant, Femcare, Ltd. – UK subsidiary of Utah Medical Products, Inc., (hereinafter referred to as Femcare) was and is a UK corporation

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and a subsidiary of Utah Medical Products, Inc. with its principal place of business located at 32 Premier Way, Romsey, Hampshire SO51 9DQ, United Kingdom, and was and is doing business in Connecticut.

5. At all times mentioned herein, the defendant, Utah Medical Products, Inc. (hereinafter referred to as Utah Medical), was and is a Utah corporation and the alter ego and parent company of Femcare, with its principal place of business located at 7043 South 300 West, Midvale, Utah, and was and is doing business in Connecticut.

6. At all times mentioned herein, the defendants were in the business of designing, developing, setting specifications, manufacturing, marketing, selling and/or distributing Filshie Clips, including the clips that were used on the plaintiffs.

7. At all times mentioned herein, the defendants had a duty, pursuant to 21 C.F.R. § 814.80, 21 C.F.R. § 814.82, 21 C.F.R. § 814.84, 21 C.F.R. § 820.20, 21 C.F.R. § 820.100, 21 C.F.R. § 820.198, 21 C.F.R. §§ 803.1, 803.10, 803.40, 803.50, and 803.58, to exercise reasonable and ordinary care in the manufacture, design, labeling, instructions, warnings, sale, marketing, safety surveillance and distribution of Filshie Clips to avoid exposing others to foreseeable and unreasonable risks of harm.

8. At all times mentioned herein, the defendants had a duty to warn the plaintiffs, the plaintiffs' physicians, and/or the medical community of the potential for migration.

9. At all times mentioned herein, the defendants breached their duty of care to the plaintiffs, plaintiffs' physician, in the manufacture, design, labeling, warnings, instructions, sale, marketing, safety surveillance, and distribution of Filshie Clips.

10. At all times mentioned herein, the defendants knew or reasonably should have known

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that Filshie Clips are dangerous or likely to be dangerous when used in their intended or reasonably foreseeable manner.

11. At the time of the manufacture and sale of the Filshie Clips, the defendants knew or should have known that Filshie Clips were designed and manufactured in such a manner to present an unreasonable risk of migration when placed on the fallopian tubes and to have unreasonable and insufficient capacity to avoid migrating from the fallopian tubes.

12. At all times mentioned herein, the Filshie Clips were defective in design because they failed to perform as safely as persons who ordinarily use the products would have expected at the time of use and their risk of harm exceed their claimed benefits.

13. At all times mentioned herein, the plaintiffs and their healthcare providers used the Filshie Clips in a manner that was reasonably foreseeable to the defendants.

14. Neither the plaintiffs nor their healthcare providers could have, by the exercise of reasonable care, discovered the Filshie Clips' defective conditions or perceived their unreasonable dangers prior to use.

15. To the extent the product information sheet did report the risk of migration, it was clearly understated and unlikely to inform a reasonable consumer/patient or their healthcare providers of the risk of harm.

16. As a result of the foregoing design defects, the Filshie Clips created risks to the health and safety of the plaintiffs that were far more significant and devastating than the risks posed by other products and procedures available to treat the corresponding medical conditions, and which far outweigh the utility of the Filshie Clips.

17. At all times mentioned herein, the defendants designed, set specifications,

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manufactured, prepared, compounded, assembled, processed, marketed, labeled, performed medical vigilance, distributed and sold the Filshie Clips that were used on the plaintiffs.

18. At all times mentioned herein, the defendants' Filshie Clips were defectively manufactured at the time that it left the defendants control.

19. At all times mentioned herein, the Filshie Clips were unreasonably dangerous in that it was unsafe when used as it was promoted by the defendants for use in tubal ligations.

20. At all times mentioned herein, the Filshie Clips were not manufactured in conformity with the manufacturer's design or in conformity with the approved design that defendants had submitted to the FDA.

21. At all times mentioned herein, the Filshie Clips were defectively and/or improperly manufactured, rendering them defective and unreasonably dangerous and hazardous to the Plaintiffs.

22. At all times mentioned herein, the defendants had a duty to prevent defective and/or improper manufacturing defects. This duty parallels the FDCA's requirement for truthfully and completely reporting incidents of adverse events, and if necessary, obtaining approval for changes in the design, manufacture, and warnings/marketing approved by the FDA. However, under the same facts, the plaintiffs would have been able to establish a recoverable claim under applicable Connecticut state and common law, even in the absence of federal law.

23. At all times mentioned herein, the defendants designed, set specifications, manufactured, prepared, compounded, assembled, processed, marketed, labeled, distributed and sold the Filshie Clips, including the ones used on the plaintiffs, in the stream of commerce and in

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the course of same, directly advertised and marketed the device to consumers or persons responsible for consumers.

24. At the time defendants marketed, labeled, distributed and sold the Filshie Clips in the stream of commerce, defendants knew or should have known that the device presented an unreasonable danger to users of the product when put to its intended and reasonably anticipated use.

25. The defendants had a continuing duty to warn the plaintiffs, plaintiffs' physicians, and/or the medical community of the potential for migration of the Filshie Clips.

26. At all times mentioned herein, the defendants failed to warn and instruct the plaintiffs and their health care providers about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration properly and adequately.

27. Rather, the defendants affirmatively advertised the safety of the Filshie Clip system vis a vis the alternative methods of bilateral tubal ligation, effectively downplaying even the *de minimis* risk of migration or expulsion inaccurately reported to the FDA for approval of the device and the healthcare community.

28. The risks associated with the Filshie Clips are of such a nature that health care providers and users could not have recognized the potential harm.

29. The risks are further of the kind that a reasonable patient would consider when providing consent for the use of the Filshie Clip method of tubal ligation over other safer alternative procedures for achieving the same result.

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30. At all times mentioned herein, the Filshie Clips were defective and unreasonably dangerous at the time of their release into the stream of commerce due to the inadequate warnings, labeling and/or instructions accompanying the product, including but not limited to, the potential for migration from intended location after placement on the fallopian tubes.

31. At all times mentioned herein, the Filshie Clips, when used in the plaintiffs, were in the same condition as when they were manufactured, inspected, marketed, labeled, promoted, distributed and sold by the defendants.

32. On or about September 13, 2018, the plaintiff, Kasandra Walsh, underwent a tubal ligation procedure at Banner Desert Hospital in Mesa, Arizona.

33. Upon information and belief, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

34. The Defendants' purposeful and fraudulent acts of concealment kept the plaintiff, Kasandra Walsh, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kasandra Walsh, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

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37. Sometime in September 2018, the plaintiff, Kasandra Walsh, began experiencing abdominal pain, which progressed with time. The pain would be sharp enough that she had trouble exercising or running. Eventually she experienced difficulty standing due to the pain. Said plaintiff sought medical attention on several occasions, but each time, the medical professionals were not able to find the source of her pain.

38. In or about September 2020, the plaintiff, Kasandra Walsh, underwent laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

39. Said severe, painful and permanent injuries suffered by the plaintiff, Kasandra Walsh, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the

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manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

40. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, was forced to undergo laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

41. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

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42. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, sustained a permanent impairment to her uterus.

43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff Kasandra Walsh's ability to carry on life's activities has been and will be permanently and severely curtailed.

SECOND COUNT (KASANDRA WALSH v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about September 13, 2018, the plaintiff, Kasandra Walsh underwent a tubal ligation procedure at Banner Desert Hospital in Mesa, Arizona.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

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34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kasandra Walsh, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kasandra Walsh, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. Sometime in September 2018, the plaintiff, Kasandra Walsh, began experiencing abdominal pain, which progressed with time. The pain would be sharp enough that she had trouble exercising or running. Eventually she experienced difficulty standing due to the pain. Said plaintiff sought medical attention on several occasions, but each time, the medical professionals were not able to find the source of her pain.

38. In or about September 2020, the plaintiff, Kasandra Walsh, underwent laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

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39. Said severe, painful and permanent injuries suffered by the plaintiff, Kasandra Walsh, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research,

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manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the

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manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

40. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, was forced to undergo laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

41. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

42. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, sustained a permanent impairment to her uterus.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, has and will

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continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh's ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRD COUNT (KASANDRA WALSH v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about September 13, 2018, the plaintiff, Kasandra Walsh underwent a tubal ligation procedure at Banner Desert Hospital in Mesa, Arizona.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kasandra Walsh, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kasandra Walsh, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

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36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. Sometime in September 2018, the plaintiff, Kasandra Walsh, began experiencing abdominal pain, which progressed with time. The pain would be sharp enough that she had trouble exercising or running. Eventually she experienced difficulty standing due to the pain. Said plaintiff sought medical attention on several occasions, but each time, the medical professionals were not able to find the source of her pain.

38. In or about September 2020, the plaintiff, Kasandra Walsh, underwent laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

39. Said severe, painful and permanent injuries suffered by the plaintiff, Kasandra Walsh, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

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(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

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(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

40. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, was forced to undergo laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

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41. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

42. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq of the Connecticut General Statues, the plaintiff, Kasandra Walsh, sustained a permanent impairment to her uterus.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connnecticut General Statutes, the plaintiff, Kasandra Walsh, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh's ability to carry on life's activities has been and will be permanently and severely curtailed.

FOURTH COUNT (KASANDRA WALSH V. UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about September 13, 2018, the plaintiff, Kasandra Walsh underwent a tubal

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ligation procedure at Banner Desert Hospital in Mesa, Arizona.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kasandra Walsh, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kasandra Walsh, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. Sometime in September 2018, the plaintiff, Kasandra Walsh, began experiencing abdominal pain, which progressed with time. The pain would be sharp enough that she had trouble exercising or running. Eventually she experienced difficulty standing due to the pain. Said plaintiff sought medical attention on several occasions, but each time, the medical professionals were not able to find the source of her pain.

38. In or about September 2020, the plaintiff, Kasandra Walsh, underwent laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the

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other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

39. Said severe, painful and permanent injuries suffered by the plaintiff, Kasandra Walsh, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

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(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

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(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

40. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, was forced to undergo laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

41. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

42. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, sustained a permanent impairment to her uterus.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-

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572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kasandra Walsh's ability to carry on life's activities has been and will be permanently and severely curtailed.

FIFTH COUNT (HANNAH LAMB v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Hannah Lamb was and is a resident of Ocala, Florida.

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

32. On or about June 24, 2014, the plaintiff, Hannah Lamb, underwent a tubal ligation procedure at Seven Rivers Regional Medical Center in Crystal River, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Hannah Lamb, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Hannah Lamb, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that

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could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2016, Hannah Lamb began experiencing severe pelvic and abdominal pain, along with irregular menstrual cycles, blood clotting, ovarian cysts, painful intercourse, and abdominal bleeding. She sought medical attention several times throughout the years, but her doctors were unable to find the source of her pain.

38. On or about February 22, 2021, after radiological imaging, Hannah Lamb's doctor confirmed her Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary.

39. Hannah Lamb continues to experience severe abdominal and pelvic pain to this day.

40. Hannah Lamb also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Hannah Lamb, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

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(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the

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Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, was forced to undergo radiological imaging to determine the cause of her pain, which revealed that the Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary. She continues to experience severe abdominal and pelvic pain to this day and she continues to live

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under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb's ability to carry on life's activities has been and will be permanently and severely curtailed.

SIXTH COUNT (HANNAH LAMB v. COOPER COMPANIES, INC.):

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1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about June 24, 2014, the plaintiff, Hannah Lamb, underwent a tubal ligation procedure at Seven Rivers Regional Medical Center in Crystal River, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, Cooper Companies.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Hannah Lamb, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Hannah Lamb, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2016, Hannah Lamb began experiencing severe pelvic and abdominal pain, along with irregular menstrual cycles, blood clotting, ovarian cysts, painful intercourse, and abdominal bleeding. She sought medical attention several times throughout the years, but her doctors were unable to find the source of her pain.

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38. On or about February 22, 2021, after radiological imaging, Hannah Lamb's doctor confirmed her Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary.

39. Hannah Lamb continues to experience severe abdominal and pelvic pain to this day.

40. Hannah Lamb also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Hannah Lamb, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

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(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

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(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, was forced to undergo radiological imaging to determine the cause of her pain, which revealed that the Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary. She continues to experience severe abdominal and pelvic pain to this day and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, has been required to expend and will be required to expend considerable sums of money for

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hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb's ability to carry on life's activities has been and will be permanently and severely curtailed.

SEVENTH COUNT (HANNAH LAMB v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about June 24, 2014, the plaintiff, Hannah Lamb, underwent a tubal ligation procedure at Seven Rivers Regional Medical Center in Crystal River, Florida.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Hannah Lamb, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Hannah Lamb, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2016, Hannah Lamb began experiencing severe pelvic and abdominal pain, along with irregular menstrual cycles, blood clotting, ovarian cysts, painful intercourse, and abdominal bleeding. She sought medical attention several times throughout the years, but her doctors were unable to find the source of her pain.

38. On or about February 22, 2021, after radiological imaging, Hannah Lamb's doctor confirmed her Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary.

39. Hannah Lamb continues to experience severe abdominal and pelvic pain to this day.

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40. Hannah Lamb also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Hannah Lamb, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

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(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, was forced to undergo radiological imaging to determine the cause of her pain, which revealed that the Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary. She continues to experience severe abdominal and pelvic pain to this day and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et

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seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb's ability to carry on life's activities has been and will be permanently and severely curtailed.

EIGHTH COUNT (HANNAH LAMB V. UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about June 24, 2014, the plaintiff, Hannah Lamb, underwent a tubal ligation procedure at Seven Rivers Regional Medical Center in Crystal River, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, Utah Medical Products, Inc.

34. The Defendants' purposeful and fraudulent acts of concealment kept the plaintiff, Hannah Lamb, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

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35. The plaintiff, Hannah Lamb, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2016, Hannah Lamb began experiencing severe pelvic and abdominal pain, along with irregular menstrual cycles, blood clotting, ovarian cysts, painful intercourse, and abdominal bleeding. She sought medical attention several times throughout the years, but her doctors were unable to find the source of her pain.

38. On or about February 22, 2021, after radiological imaging, Hannah Lamb's doctor confirmed her Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary.

39. Hannah Lamb continues to experience severe abdominal and pelvic pain to this day.

40. Hannah Lamb also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Hannah Lamb, were caused by the negligence and/or carelessness of the defendant, Utah Medical,

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through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

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(j) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(k) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(l) In that the "Filshie Clips" was defectively designed for its intended purpose;

(m) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(n) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(o) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(p) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(q) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

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42. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, was forced to undergo radiological imaging to determine the cause of her pain, which revealed that the Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary. She continues to experience severe abdominal and pelvic pain to this day and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb, has and will continue

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to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Hannah Lamb's ability to carry on life's activities has been and will be permanently and severely curtailed.

NINTH COUNT (KYENNA HAMILTON v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Kyenna Hamilton was and is a resident of Charlotte, North Carolina.

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

32. On or about March 6, 2015, the plaintiff, Kyenna Hamilton, underwent a tubal ligation procedure at Coastal Carolina Hospital in Hardeeville, South Carolina.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kyenna Hamilton, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kyenna Hamilton, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that

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could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Kyenna Hamilton began experiencing severe pelvic and abdominal pain. The pain became so severe that it impacts her ability to walk or move. She consulted with her healthcare providers who were unable to find the source of her pain.

38. On or about March 31, 2021, after radiological imaging, Kyenna Hamilton's doctor confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience severe abdominal and pelvic pain to this day, making it difficult to function and do day-to-day activities.

40. Kyenna Hamilton also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Kyenna Hamilton, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

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(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

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(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, was forced to undergo radiological imaging after she experienced pain so severe that it impacted her ability to walk or move. Said imaging revealed that the Filshie Clips had migrated and were displaced. She continues to experience severe abdominal and pelvic pain and lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

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43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton's ability to carry on life's activities has been and will be permanently and severely curtailed.

TENTH COUNT (KYENNA HAMILTON v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

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32. On or about March 6, 2015, the plaintiff, Kyenna Hamilton underwent a tubal ligation procedure at Coastal Carolina Hospital in Hardeeville, South Carolina.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kyenna Hamilton, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kyenna Hamilton, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Kyenna Hamilton began experiencing severe pelvic and abdominal pain. The pain became so severe that it impacts her ability to walk or move. She consulted with her healthcare providers who were unable to find the source of her pain.

38. On or about March 31, 2021, after radiological imaging, Kyenna Hamilton's doctor confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience severe abdominal and pelvic pain to this day, making

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it difficult to function and do day-to-day activities.

40. Kyenna Hamilton also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Kyenna Hamilton, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

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(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, was forced to undergo radiological imaging after she experienced pain so severe that it impacted her ability to walk or move. Said imaging revealed that the Filshie Clips had migrated and were displaced. She continues to experience severe abdominal and pelvic pain and lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section

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52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton's ability to carry on life's activities has been and will be permanently and severely curtailed.

ELEVENTH COUNT (KYENNA HAMILTON v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about March 6, 2015, the plaintiff, Kyenna Hamilton, underwent a tubal ligation procedure at Coastal Carolina Hospital in Hardeeville, South Carolina.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kyenna Hamilton, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

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35. The plaintiff, Kyenna Hamilton, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Kyenna Hamilton began experiencing severe pelvic and abdominal pain. The pain became so severe that it impacts her ability to walk or move. She consulted with her healthcare providers who were unable to find the source of her pain.

38. On or about March 31, 2021, after radiological imaging, Kyenna Hamilton's doctor confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience severe abdominal and pelvic pain to this day, making it difficult to function and do day-to-day activities.

40. Kyenna Hamilton also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Kyenna Hamilton, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

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(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie

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Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of

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the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, was forced to undergo radiological imaging after she experienced pain so severe that it impacted her ability to walk or move. Said imaging revealed that the Filshie Clips had migrated and were displaced. She continues to experience severe abdominal and pelvic pain and lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kyenna Hamilton, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton's ability to carry on

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life's activities has been and will be permanently and severely curtailed.

TWELFTH COUNT (KYENNA HAMILTON V. UTAH MEDICAL PRODUCTS, INC.)

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about March 6, 2015, the plaintiff, Kyenna Hamilton, underwent a tubal ligation procedure at Coastal Carolina Hospital in Hardeeville, South Carolina.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kyenna Hamilton, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kyenna Hamilton, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Kyenna Hamilton began experiencing severe pelvic and abdominal pain. The pain became so severe that it impacts her ability to walk or move. She consulted with her healthcare providers who were unable to find the source of her pain.

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38. On or about March 31, 2021, after radiological imaging, Kyenna Hamilton's doctor confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience severe abdominal and pelvic pain to this day, making it difficult to function and do day-to-day activities.

40. Kyenna Hamilton also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Kyenna Hamilton, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, was forced to undergo radiological imaging after she experienced pain so severe that it impacted her ability to walk or move. Said imaging revealed that the Filshie Clips had migrated and were displaced. She continues to experience severe abdominal and pelvic pain and lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

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44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Kyenna Hamilton's ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTEENTH COUNT (CRYSTAL STEWART v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Crystal Stewart was and is a resident of Akron, Ohio.

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

32. On or about November 13, 2015, the plaintiff, Crystal Stewart, underwent a tubal ligation procedure at Cleveland Clinic Akron General in Akron, Ohio.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

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34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kyenna Hamilton, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kyenna Hamilton, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2015, Crystal Stewart began experiencing intense pelvic pain, including cramping, burning, and throbbing. She consulted with her healthcare providers who were unable to find the source of her pain. Doctors believed that her pain was due to endometriosis.

38. On or about July 6, 2021, following radiology imaging, Crystal Stewart's doctors confirmed that her right Filshie Clip was displaced. In June of 2022, Crystal Stewart's underwent surgery related to her endometriosis diagnosis. During surgery, Crystal Stewart's doctor confirmed that her Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed.

39. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found

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during her last surgery.

40. Crystal Stewart also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Crystal Stewart were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

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(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

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(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, was forced to endure intense pelvic pain, including cramping, burning, and throbbing. She underwent radiology imaging that confirmed her right Filshie Clip was displaced and during Crystal Stewart's surgery related to her endometriosis diagnosis, her doctor confirmed that the Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found during her last surgery and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

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44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart's ability to carry on life's activities has been and will be permanently and severely curtailed.

FOURTEENTH COUNT (CRYSTAL STEWART v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about November 13, 2015, the plaintiff, Crystal Stewart, underwent a tubal ligation procedure at Cleveland Clinic Akron General in Akron, Ohio.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

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34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Crystal Stewart, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Crystal Stewart, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2015, Crystal Stewart began experiencing intense pelvic pain, including cramping, burning, and throbbing. She consulted with her healthcare providers who were unable to find the source of her pain. Doctors believed that her pain was due to endometriosis.

38. On or about July 6, 2021, following radiology imaging, Crystal Stewart's doctors confirmed that her right Filshie Clip was displaced. In June of 2022, Crystal Stewart underwent surgery related to her endometriosis diagnosis. During surgery, Crystal Stewart's doctor confirmed that her Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed.

39. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found

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during her last surgery.

40. Crystal Stewart also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Crystal Stewart, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

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(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, was forced to endure intense pelvic pain, including cramping, burning, and throbbing. She underwent radiology imaging that confirmed her right Filshie Clip was displaced and during Crystal Stewart's surgery related to her endometriosis diagnosis, her doctor confirmed that the Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found during her last surgery and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, has been required to expend and will be required to expend considerable sums of money for

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hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart's ability to carry on life's activities has been and will be permanently and severely curtailed.

FIFTEENTH COUNT (CRYSTAL STEWART v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about November 13, 2015, the plaintiff, Crystal Stewart, underwent a tubal ligation procedure at Cleveland Clinic Akron General in Akron, Ohio.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Crystal Stewart, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Crystal Stewart, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2015, Crystal Stewart began experiencing intense pelvic pain, including cramping, burning, and throbbing. She consulted with her healthcare providers who were unable to find the source of her pain. Doctors believed that her pain was due to endometriosis.

38. On or about July 6, 2021, following radiology imaging, Crystal Stewart's doctors confirmed that her right Filshie Clip was displaced. In June of 2022, Crystal Stewart underwent surgery related to her endometriosis diagnosis. During surgery, Crystal Stewart's doctor confirmed that her Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed.

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39. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found during her last surgery.

40. Crystal Stewart also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Crystal Stewart, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, was forced to endure intense pelvic pain, including cramping, burning, and throbbing. She underwent radiology imaging that confirmed her right Filshie Clip was displaced and during Crystal Stewart's surgery related to her endometriosis diagnosis, her doctor confirmed that the Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found during her last surgery and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et

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seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart's ability to carry on life's activities has been and will be permanently and severely curtailed.

SIXTEENTH COUNT (CRYSTAL STEWART V. UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about November 13, 2015, the plaintiff, Crystal Stewart, underwent a tubal ligation procedure at Cleveland Clinic Akron General in Akron, Ohio.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Crystal Stewart, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Crystal Stewart, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2015, Crystal Stewart began experiencing intense pelvic pain, including cramping, burning, and throbbing. She consulted with her healthcare providers who were unable to find the source of her pain. Doctors believed that her pain was due to endometriosis.

38. On or about July 6, 2021, following radiology imaging, Crystal Stewart's doctors confirmed that her right Filshie Clip was displaced. In June of 2022, Crystal Stewart underwent surgery related to her endometriosis diagnosis. During surgery, Ms. Stewart's doctor confirmed that her Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed.

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39. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found during her last surgery.

40. Crystal Stewart also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Crystal Stewart, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, was forced to endure intense pelvic pain, including cramping, burning, and throbbing. She underwent radiology imaging that confirmed her right Filshie Clip was displaced and during Crystal Stewart's surgery related to her endometriosis diagnosis, her doctor confirmed that the Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found during her last surgery and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-

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572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Crystal Stewart's ability to carry on life's activities has been and will be permanently and severely curtailed.

SEVENTEENTH COUNT (LORETTA FERRIS v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Loretta Ferris was and is a resident of Inglis, Florida.

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

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33. On or about August 8, 2013, the plaintiff, Loretta Ferris, underwent a tubal ligation procedure at Seven Rivers Hospital in Crystal River, Florida.

34. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

35. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Loretta Ferris, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

36. The plaintiff, Loretta Ferris, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

37. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

38. Within months of resuming sexual activity, Loretta Ferris began experiencing abdominal pain. She started to experience heavy and painful menstrual cycles and large blood clots. Within six years, the pain became debilitating and led to headaches, nausea and low-grade fevers. She consulted with her healthcare providers who were unable to find the source of her pain.

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39. In early 2022, following radiological imaging, Loretta Ferris's doctor confirmed her Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy, however, her doctors were unable to locate the migrated Filshie Clips.

40. She continues to experience severe abdominal pain to this day, along with nausea, headaches, cold sweats, and loss of consciousness.

41. Loretta Ferris also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

42. Said severe, painful and permanent injuries suffered by the plaintiff, Loretta Ferris, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

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(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

43. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, was forced to undergo radiological imaging after she experienced heavy and painful menstrual cycles and large blood clots, debilitating pain, headaches, nausea and low-grade fevers. Said imaging revealed that the Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy but the doctors were unable to locate the migrated Filshie Clips. She continues to experience severe abdominal pain, nausea, headaches, cold sweats, and loss of consciousness, and she lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

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45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, sustained a permanent impairment to her uterus.

46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

47. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris' ability to carry on life's activities has been and will be permanently and severely curtailed.

EIGHTEENTH COUNT (LORETTA FERRIS v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about August 8, 2013, the plaintiff, Loretta Ferris, underwent a tubal ligation procedure at Seven Rivers Hospital in Crystal River, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

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34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Loretta Ferris, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Loretta Ferris, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. Within months of resuming sexual activity, Ms. Ferris began experiencing abdominal pain. She started to experience heavy and painful menstrual cycles and large blood clots. Within six years, the pain became debilitating and led to headaches, nausea and low-grade fevers. She consulted with her healthcare providers who were unable to find the source of her pain.

38. In early 2022, following radiological imaging, Ms. Ferris's doctor confirmed her Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy, however, her doctors were unable to locate the migrated Filshie Clips.

39. She continues to experience severe abdominal pain to this day, along with nausea, headaches, cold sweats, and loss of consciousness.

40. Ms. Ferris also continues to live under the specter of having the foreign bodies

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migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Loretta Ferris, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

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(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

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(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, was forced to undergo radiological imaging after she experienced heavy and painful menstrual cycles and large blood clots, debilitating pain, headaches, nausea and low-grade fevers. Said imaging revealed that the Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy but the doctors were unable to locate the migrated Filshie Clips. She continues to experience severe abdominal pain, nausea, headaches, cold sweats, and loss of consciousness, and she lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section

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52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris' ability to carry on life's activities has been and will be permanently and severely curtailed.

NINETEENTH COUNT (LORETTA FERRIS v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about August 8, 2013, the plaintiff, Loretta Ferris, underwent a tubal ligation procedure at Seven Rivers Hospital in Crystal River, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Loretta Ferris, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

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35. The plaintiff, Loretta Ferris, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. Within months of resuming sexual activity, Ms. Ferris began experiencing abdominal pain. She started to experience heavy and painful menstrual cycles and large blood clots. Within six years, the pain became debilitating and led to headaches, nausea and low-grade fevers. She consulted with her healthcare providers who were unable to find the source of her pain.

38. In early 2022, following radiological imaging, Ms. Ferris's doctor confirmed her Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy, however, her doctors were unable to locate the migrated Filshie Clips.

39. She continues to experience severe abdominal pain to this day, along with nausea, headaches, cold sweats, and loss of consciousness.

40. Ms. Ferris also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

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41. Said severe, painful and permanent injuries suffered by the plaintiff, Loretta Ferris, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

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(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

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(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, was forced to undergo radiological imaging after she experienced heavy and painful menstrual cycles and large blood clots, debilitating pain, headaches, nausea and low-grade fevers. Said imaging revealed that the Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy but the doctors were unable to locate the migrated Filshie Clips. She continues to experience severe abdominal pain, nausea, headaches, cold sweats, and loss of consciousness, and she lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, sustained a permanent impairment to her uterus.

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45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris' ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTIETH COUNT (LORETTA FERRIS V. UTAH MEDICAL PRODUCTS, INC.

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about August 8, 2013, the plaintiff, Loretta Ferris, underwent a tubal ligation procedure at Seven Rivers Hospital in Crystal River, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Loretta Ferris, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Loretta Ferris, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that

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could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. Within months of resuming sexual activity, Ms. Ferris began experiencing abdominal pain. She started to experience heavy and painful menstrual cycles and large blood clots. Within six years, the pain became debilitating and led to headaches, nausea and low-grade fevers. She consulted with her healthcare providers who were unable to find the source of her pain.

38. In early 2022, following radiological imaging, Ms. Ferris's doctor confirmed her Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy, however, her doctors were unable to locate the migrated Filshie Clips.

39. She continues to experience severe abdominal pain to this day, along with nausea, headaches, cold sweats, and loss of consciousness.

40. Ms. Ferris also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Loretta Ferris, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

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(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie

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Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et

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seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, was forced to undergo radiological imaging after she experienced heavy and painful menstrual cycles and large blood clots, debilitating pain, headaches, nausea and low-grade fevers. Said imaging revealed that the Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy but the doctors were unable to locate the migrated Filshie Clips. She continues to experience severe abdominal pain, nausea, headaches, cold sweats, and loss of consciousness, and she lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

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46. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Loretta Ferris' ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-FIRST COUNT (SHANTAIL THOMAS v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Shantail Thomas was and is a resident of Atmore, Alabama.

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

32. On or about April 1, 2019, the plaintiff, Shantail Thomas, underwent a tubal ligation procedure at South Baldwin Regional Medical Center in Foley, Arizona.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Shantail Thomas, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Shantail Thomas, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

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36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In March 2020, Ms. Thomas began experiencing severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain.

38. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

39. Said severe, painful and permanent injuries suffered by the plaintiff, Shantail Thomas, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

40. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, experienced severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

41. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

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42. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, sustained a permanent impairment to her uterus.

43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas' ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-SECOND COUNT (SHANTAIL THOMAS v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about April 1, 2019, the plaintiff, Shantail Thomas, underwent a tubal ligation procedure at South Baldwin Regional Medical Center in Foley, Arizona.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

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34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Shantail Thomas, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Shantail Thomas, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In March 2020, Ms. Thomas began experiencing severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain.

38. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

39. Said severe, painful and permanent injuries suffered by the plaintiff, Shantail Thomas, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

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(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie

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Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

40. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et

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seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, experienced severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

41. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

42. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, sustained a permanent impairment to her uterus.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

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44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas' ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-THIRD COUNT (SHANTAIL THOMAS v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about April 1, 2019, the plaintiff, Shantail Thomas, underwent a tubal ligation procedure at South Baldwin Regional Medical Center in Foley, Arizona.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Shantail Thomas, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Shantail Thomas, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

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36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In March 2020, Ms. Thomas began experiencing severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain.

38. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

39. Said severe, painful and permanent injuries suffered by the plaintiff, Shantail Thomas, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

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(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

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(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

40. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, experienced severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

41. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, has been required to

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expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

42. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, sustained a permanent impairment to her uterus.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas' ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-FOURTH COUNT (SHANTAIL THOMAS V. UTAH MEDICAL PRODUCTS, INC.

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about April 1, 2019, the plaintiff, Shantail Thomas, underwent a tubal ligation procedure at South Baldwin Regional Medical Center in Foley, Arizona.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Shantail Thomas, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Shantail Thomas, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In March 2020, Ms. Thomas began experiencing severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain.

38. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

39. Said severe, painful and permanent injuries suffered by the plaintiff, Shantail Thomas, were caused by the negligence and/or carelessness of the defendant, Utah Medical,

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through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

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(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

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40. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, experienced severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

41. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

42. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, sustained a permanent impairment to her uterus.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas, has and will

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continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Shantail Thomas' ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-FIFTH COUNT (MEGHAN REHAHN v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Meghan Rehahn was and is a resident of Ecorse, Michigan.

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

32. On or about May 16, 2018, the plaintiff, Megan Rehahn, underwent a tubal ligation procedure at Garden City Hospital in Garden City, Michigan.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kyenna Hamilton, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kyenna Hamilton, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that

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could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In 2018, Ms. Rehahn began experiencing severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. She consulted with her healthcare providers who were unable to find the source of her pain. In fact, she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not).

38. In July of 2022, following radiological imaging, Ms. Rehahn's doctor who informed her that her Filshie Clips migrated and were displaced.

39. She continues to experience extreme pain to this day.

40. Ms. Rehahn continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Megan Rehahn, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

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(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

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(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Megan Rehahn experienced severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. Her healthcare providers who were unable to find the source of her pain and she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not). She was forced to have radiological imaging, after which Ms. Rehahn's doctor informed her that her Filshie Clips migrated and were displaced. She continues to experience extreme pain to this day and she

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continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn's ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-SIXTH COUNT (MEGHAN REHAHN v. COOPER COMPANIES, INC.):

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1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about May 16, 2018, the plaintiff, Megan Rehahn, underwent a tubal ligation procedure at Garden City Hospital in Garden City, Michigan.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Meghan Rehahn, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Meghan Rehahn, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In 2018, Ms. Rehahn began experiencing severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. She consulted with her healthcare providers who were unable to find the source of her pain. In fact, she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not).

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38. In July of 2022, following radiological imaging, Ms. Rehahn's doctor who informed her that her Filshie Clips migrated and were displaced.

39. She continues to experience extreme pain to this day.

40. Ms. Rehahn continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Meghan Rehahn, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Megan Rehahn experienced severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. Her healthcare providers who were unable to find the source of her pain and she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not). She was forced to have radiological imaging, after which Ms. Rehahn's doctor informed her that her Filshie Clips migrated and were displaced. She continues to experience extreme pain to this day and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, has been required to expend and will be required to expend considerable sums of money for

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hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn's ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-SEVENTH COUNT (MEGHAN REHAHN v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about May 16, 2018, the plaintiff, Megan Rehahn, underwent a tubal ligation procedure at Garden City Hospital in Garden City, Michigan.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Meghan Rehahn, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Meghan Rehahn, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In 2018, Ms. Rehahn began experiencing severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. She consulted with her healthcare providers who were unable to find the source of her pain. In fact, she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not).

38. In July of 2022, following radiological imaging, Ms. Rehahn's doctor who informed her that her Filshie Clips migrated and were displaced.

39. She continues to experience extreme pain to this day.

40. Ms. Rehahn continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these

products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Meghan Rehahn, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

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(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

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(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Megan Rehahn experienced severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. Her healthcare providers who were unable to find the source of her pain and she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not). She was forced to have radiological imaging, after which Ms. Rehahn's doctor informed her that her Filshie Clips migrated and were displaced. She continues to experience extreme pain to this day and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, sustained a permanent impairment to her uterus.

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45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn's ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-EIGHTH COUNT (MEGHAN REHAHN V. UTAH MEDICAL PRODUCTS, INC.

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about May 16, 2018, the plaintiff, Megan Rehahn, underwent a tubal ligation procedure at Garden City Hospital in Garden City, Michigan.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Meghan Rehahn, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Meghan Rehahn, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the

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procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In 2018, Ms. Rehahn began experiencing severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. She consulted with her healthcare providers who were unable to find the source of her pain. In fact, she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not).

38. In July of 2022, following radiological imaging, Ms. Rehahn's doctor who informed her that her Filshie Clips migrated and were displaced.

39. She continues to experience extreme pain to this day.

40. Ms. Rehahn continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Meghan Rehahn, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

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(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie

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Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et

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seq. of the Connecticut General Statutes, the plaintiff, Megan Rehahn experienced severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. Her healthcare providers who were unable to find the source of her pain and she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not). She was forced to have radiological imaging, after which Ms. Rehahn's doctor informed her that her Filshie Clips migrated and were displaced. She continues to experience extreme pain to this day and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn, has and will

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continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Meghan Rehahn's ability to carry on life's activities has been and will be permanently and severely curtailed.

TWENTY-NINTH COUNT (ANGELA BLAHNIK v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Angela Blahnik was and is a resident of Panama City Beach, Florida.

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

32. In or about 2016, the plaintiff, Angela Blahnik, underwent a tubal ligation procedure at the Panama City Surgery Center in Panama City, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kyenna Hamilton, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Kyenna Hamilton, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that

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could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Ms. Blahnik began experiencing severe abdominal pain and extreme heavy cycles. She consulted with her healthcare providers who were unable to find the source of her pain.

38. On or about July 22, 2022, following radiological imaging, Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience pain to this day.

40. Ms. Blahnik continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Angela Blahnik, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

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(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

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(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik,

began experiencing severe abdominal pain and extreme heavy cycles and her healthcare providers were unable to find the source of her pain. She was also forced to have radiological imaging, after which Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

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43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik's ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTIETH COUNT (ANGELA BLAHNIK v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

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32. In or about 2016, the plaintiff, Angela Blahnik, underwent a tubal ligation procedure at the Panama City Surgery Center in Panama City, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Angela Blahnik, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Angela Blahnik, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Ms. Blahnik began experiencing severe abdominal pain and extreme heavy cycles. She consulted with her healthcare providers who were unable to find the source of her pain.

38. On or about July 22, 2022, following radiological imaging, Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience pain to this day.

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40. Ms. Blahnik continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Angela Blahnik, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

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(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, began experiencing severe abdominal pain and extreme heavy cycles and her healthcare providers were unable to find the source of her pain. She was also forced to have radiological imaging, after which Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

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44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik's ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-FIRST COUNT (ANGELA BLAHNIK v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. In or about 2016, the plaintiff, Angela Blahnik, underwent a tubal ligation procedure at the Panama City Surgery Center in Panama City, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

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34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Angela Blahnik, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Angela Blahnik, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Ms. Blahnik began experiencing severe abdominal pain and extreme heavy cycles. She consulted with her healthcare providers who were unable to find the source of her pain.

38. On or about July 22, 2022, following radiological imaging, Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience pain to this day.

40. Ms. Blahnik continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Angela Blahnik, were caused by the negligence and/or carelessness of the defendant, Femcare, through

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its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

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(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

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42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, began experiencing severe abdominal pain and extreme heavy cycles and her healthcare providers were unable to find the source of her pain. She was also forced to have radiological imaging, after which Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, has and will continue to

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suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik's ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-SECOND COUNT (ANGELA BLAHNIK V. UTAH MEDICAL PRODUCTS, INC.

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. In or about 2016, the plaintiff, Angela Blahnik, underwent a tubal ligation procedure at the Panama City Surgery Center in Panama City, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Angela Blahnik, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Angela Blahnik, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

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36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Ms. Blahnik began experiencing severe abdominal pain and extreme heavy cycles. She consulted with her healthcare providers who were unable to find the source of her pain.

38. On or about July 22, 2022, following radiological imaging, Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience pain to this day.

40. Ms. Blahnik continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Angela Blahnik, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

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(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

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(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, began experiencing severe abdominal pain and extreme heavy cycles and her healthcare providers were unable to find the source of her pain. She was also forced to have radiological imaging, after which Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a

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result of these products.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Angela Blahnik's ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-THIRD COUNT (MELISSA WATTERS v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Melissa Watters was a resident of Princeton, North Carolina, and is now a resident of Selma, North Carolina.

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2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

32. On or about April 4, 2013, the plaintiff, Melissa Watters, underwent a tubal ligation procedure at University of North Carolina in Chapel Hill, North Carolina.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Melissa Watters, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Melissa Watters, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around early 2022, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time.

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38. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments.

39. On or about February 8, 2022, Ms. Watters's doctor discovered a migrated Filshie Clip via ultrasound and CT scan. Plaintiff was informed the Filshie Clips remained in her body and one was displaced, having migrated from its original placement.

40. In October 2022, Ms. Watters underwent two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip. Those Filshie Clips were successfully removed.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Melissa Watters, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments. Ms. Watters was forced to undergo two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip.

43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, has been required to expend and will be required to expend considerable sums of money for

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hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters' ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-FOURTH COUNT (MELISSA WATTERS v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about April 4, 2013, the plaintiff, Melissa Watters, underwent a tubal ligation procedure at University of North Carolina in Chapel Hill, North Carolina.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Melissa Watters, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Melissa Watters, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around early 2022, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time.

38. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments.

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39. On or about February 8, 2022, Ms. Watters's doctor discovered a migrated Filshie Clip via ultrasound and CT scan. Plaintiff was informed the Filshie Clips remained in her body and one was displaced, having migrated from its original placement.

40. In October 2022, Ms. Watters underwent two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip. Those Filshie Clips were successfully removed.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Melissa Watters, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments. Ms. Watters was forced to undergo two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, has been

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required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters' ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-FIFTH COUNT (MELISSA WATTERS v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about April 4, 2013, the plaintiff, Melissa Watters, underwent a tubal ligation procedure at University of North Carolina in Chapel Hill, North Carolina.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Melissa Watters, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Melissa Watters, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around early 2022, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time.

38. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments.

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39. On or about February 8, 2022, Ms. Watters's doctor discovered a migrated Filshie Clip via ultrasound and CT scan. Plaintiff was informed the Filshie Clips remained in her body and one was displaced, having migrated from its original placement.

40. In October 2022, Ms. Watters underwent two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip. Those Filshie Clips were successfully removed.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Melissa Watters, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments. Ms. Watters was forced to undergo two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, has been required to

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expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters' ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-SIXTH COUNT (MELISSA WATTERS V. UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about April 4, 2013, the plaintiff, Melissa Watters, underwent a tubal ligation procedure at University of North Carolina in Chapel Hill, North Carolina.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Melissa Watters, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Melissa Watters, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around early 2022, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time.

38. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments.

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39. On or about February 8, 2022, Ms. Watters's doctor discovered a migrated Filshie Clip via ultrasound and CT scan. Plaintiff was informed the Filshie Clips remained in her body and one was displaced, having migrated from its original placement.

40. In October 2022, Ms. Watters underwent two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip. Those Filshie Clips were successfully removed.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Melissa Watters, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or emoployees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments. Ms. Watters was forced to undergo two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, has been required

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to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Melissa Watters' ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-SEVENTH COUNT (STEPHANIE MENDEZ v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Stephanie Mendez was and is a resident of Davenport, Florida.

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

32. On or about November 28, 2016, the plaintiff, Stephanie Mendez, underwent a tubal ligation procedure at AdventHealth Winter Park in Winter Park, Florida.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Stephanie Mendez, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Stephanie Mendez, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Ms. Mendez began experiencing excruciating pain, particularly in her abdominal area. She consulted her doctors who were not able to find the source of her pain.

38. On or around November 1, 2022, following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed.

39. She was also informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy.

40. She continues to experience pain to this day.

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41. Said severe, painful and permanent injuries suffered by the plaintiff, Stephanie Mendez, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie

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Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et

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seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, experienced excruciating pain, particularly in her abdominal area and her doctors were not able to find the source of her pain. Following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed and she was informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy. She continues to experience pain to this day.

43. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

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46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez's ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-EIGHTH COUNT (STEPHANIE MENDEZ v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about November 28, 2016, the plaintiff, Stephanie Mendez, underwent a tubal ligation procedure at AdventHealth Winter Park in Winter Park, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Stephanie Mendez, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Stephanie Mendez, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

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36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Ms. Mendez began experiencing excruciating pain, particularly in her abdominal area. She consulted her doctors who were not able to find the source of her pain.

38. On or around November 1, 2022, following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed.

39. She was also informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy.

40. She continues to experience pain to this day.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Stephanie Mendez, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

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(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

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(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, experienced excruciating pain, particularly in her abdominal area and her doctors were not able to find the source of her pain. Following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed and she was informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy. She continues to experience pain to this day.

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43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez's ability to carry on life's activities has been and will be permanently and severely curtailed.

THIRTY-NINTH COUNT (STEPHANIE MENDEZ v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated

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and re-alleged as paragraphs one through thirty-one of this count.

32. On or about November 28, 2016, the plaintiff, Stephanie Mendez, underwent a tubal ligation procedure at AdventHealth Winter Park in Winter Park, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Stephanie Mendez, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Stephanie Mendez, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Ms. Mendez began experiencing excruciating pain, particularly in her abdominal area. She consulted her doctors who were not able to find the source of her pain.

38. On or around November 1, 2022, following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed.

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39. She was also informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy.

40. She continues to experience pain to this day.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Stephanie Mendez, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

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(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, experienced excruciating pain, particularly in her abdominal area and her doctors were not able to find the source of her pain. Following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed and she was informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy. She continues to experience pain to this day.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et

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seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTIETH COUNT (STEPHANIE MENDEZ V. UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about November 28, 2016, the plaintiff, Stephanie Mendez, underwent a tubal ligation procedure at AdventHealth Winter Park in Winter Park, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Stephanie Mendez, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

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35. The plaintiff, Stephanie Mendez, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In or around 2017, Ms. Mendez began experiencing excruciating pain, particularly in her abdominal area. She consulted her doctors who were not able to find the source of her pain.

38. On or around November 1, 2022, following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed.

39. She was also informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy.

40. She continues to experience pain to this day.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Stephanie Mendez, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

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(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie

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Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et

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seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, experienced excruciating pain, particularly in her abdominal area and her doctors were not able to find the source of her pain. Following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed and she was informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy. She continues to experience pain to this day.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Utah

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Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Stephanie Mendez's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTY-FIRST COUNT (SARA VANKAMPEN v. COOPERSURGICAL, INC.):

1. At all times mentioned herein, the plaintiff Sara VanKampen was and is a resident of Gainesville, Florida

2-31. Paragraphs two through thirty-one of the First Count are hereby incorporated and realleged as paragraphs two through thirty-one of this Count.

33. On or about June 28, 2017, the plaintiff, Sara VanKampen, underwent a tubal ligation procedure at North Florida Regional in Gainesville, Florida.

34. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, CooperSurgical.

35. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Sara VanKampen, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

36. The plaintiff, Sara VanKampen, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

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37. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

38. In 2022, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches. She consulted with numerous doctors who were unable to find the source of her pain.

39. On or around December 24, 2022, following radiological imaging, Ms. VanKampen's medical provider confirmed her Filshie Clips had migrated and were displaced.

40. She continues to experience pain to this day.

41. Ms. VanKampen continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

42. Said severe, painful and permanent injuries suffered by the plaintiff, Sara VanKampen, were caused by the negligence and/or carelessness of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(c) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

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(d) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(e) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" were safe for its intended use;

(f) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(g) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(h) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(i) In that they failed to warn and instruct the plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(j) In that the "Filshie Clips" was defectively designed for its intended purpose;

(k) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

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(l) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(m) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(n) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(o) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

43. As a result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches and her doctors who were unable to find the source of her pain. Ms. VanKampen had to have radiological imaging to confirm her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

44. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, has been required to expend and will be required to expend considerable sums of money for

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hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

45. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, sustained a permanent impairment to her uterus.

46. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

47. As a further result of the carelessness and negligence of the defendant, CooperSurgical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTY-SECOND COUNT (SARA VANKAMPEN v. COOPER COMPANIES, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about June 28, 2017, the plaintiff, Sara VanKampen, underwent a tubal ligation procedure at North Florida Regional in Gainesville, Florida.

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33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Cooper Companies.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Sara VanKampen, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Sara VanKampen, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In 2022, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches. She consulted with numerous doctors who were unable to find the source of her pain.

38. On or around December 24, 2022, following radiological imaging, Ms. VanKampen's medical provider confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience pain to this day.

40. Ms. VanKampen continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

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41. Said severe, painful and permanent injuries suffered by the plaintiff, Sara VanKampen, were caused by the negligence and/or carelessness of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

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(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

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(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches and her doctors who were unable to find the source of her pain. Ms. VanKampen had to have radiological imaging to confirm her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, sustained a permanent impairment to her uterus.

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45. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Cooper Companies, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTY-THIRD COUNT (SARA VANKAMPEN v. FEMCARE, LTD.-UK SUBSIDIARY OF UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about June 28, 2017, the plaintiff, Sara VanKampen, underwent a tubal ligation procedure at North Florida Regional in Gainesville, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Femcare.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Sara VanKampen, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Sara VanKampen, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the

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procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In 2022, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches. She consulted with numerous doctors who were unable to find the source of her pain.

38. On or around December 24, 2022, following radiological imaging, Ms. VanKampen's medical provider confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience pain to this day.

40. Ms. VanKampen continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Sara VanKampen, were caused by the negligence and/or carelessness of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

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(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

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(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches and her doctors who were unable to find the source of her pain.

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Ms. VanKampen had to have radiological imaging to confirm her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

44. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Femcare, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen's ability to carry on life's activities has been and will be permanently and severely curtailed.

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FORTY-FOURTH COUNT (SARA VANKAMPEN V. UTAH MEDICAL PRODUCTS, INC.):

1-31. Paragraphs one through thirty-one of the preceding count are hereby incorporated and re-alleged as paragraphs one through thirty-one of this count.

32. On or about June 28, 2017, the plaintiff, Sara VanKampen, underwent a tubal ligation procedure at North Florida Regional in Gainesville, Florida.

33. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by defendant, Utah Medical.

34. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Sara VanKampen, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

35. The plaintiff, Sara VanKampen, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

36. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

37. In 2022, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches. She consulted with numerous doctors who were unable to find the source of her pain.

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38. On or around December 24, 2022, following radiological imaging, Ms. VanKampen's medical provider confirmed her Filshie Clips had migrated and were displaced.

39. She continues to experience pain to this day.

40. Ms. VanKampen continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

41. Said severe, painful and permanent injuries suffered by the plaintiff, Sara VanKampen, were caused by the negligence and/or carelessness of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

42. As a result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches and her doctors who were unable to find the source of her pain. Ms. VanKampen had to have radiological imaging to confirm her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

43. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, medical care and treatment and medications all to her financial loss.

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44. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, sustained a permanent impairment to her uterus.

45. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

46. As a further result of the carelessness and negligence of the defendant, Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Section 52-572n et seq. of the Connecticut General Statutes, the plaintiff, Sara VanKampen's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTY-FIFTH COUNT (KASANDRA WALSH v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT, § 42-110b(a)):

1. At all times mentioned herein, the plaintiff Kasandra Walsh was and is a resident of Battle Ground, Washington.

2. At all times mentioned herein, the defendant, CooperSurgical, Inc. (hereinafter referred to as CooperSurgical) was and is a Delaware corporation duly authorized to transact business in Connecticut.

3. At all times mentioned herein, the defendant, Cooper Companies, Inc., (hereinafter referred to as Cooper Companies), was and is a Delaware corporation and the alter

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ego and parent company of CooperSurgical, with its principal place of business located at 6101 Bollinger Canyon Road, in San Ramon, California, and was and is doing business in Connecticut.

4. At all times mentioned herein, the defendant, Femcare, Ltd. – UK subsidiary of Utah Medical Products, Inc., (hereinafter referred to as Femcare) was and is a UK corporation and a subsidiary of Utah Medical Products, Inc. with its principal place of business located at 32 Premier Way, Romsey, Hampshire SO51 9DQ, United Kingdom, and was and is doing business in Connecticut.

5. At all times mentioned herein, the defendant, Utah Medical Products, Inc. (hereinafter referred to as Utah Medical), was and is a Utah corporation and the alter ego and parent company of Femcare, with its principal place of business located at 7043 South 300 West, Midvale, Utah 84047-1048, and was and is doing business in Connecticut.

6. The Connecticut Unfair Trade Practices Act, prohibits "unfair or deceptive acts or practices in the conduct of trade or commerce." Conn. Stat. § 42-110b(a). "Any person who suffers any ascertainable loss . . . may bring an action in the judicial district in which the plaintiff or defendant resides or has his principal place of business or is doing business, to recover actual damages." Conn. Stat. § 42-110g(a).

7. At all times mentioned herein, the defendants, CooperSurgical, Cooper Companies, Femcare and/or Utah Medical, engaged in unfair and deceptive acts or practices when it failed to adhere to applicable federal and/or state regulations that relate to the manufacture, design, distribution, marketing and sale of the Filshie Clips.

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8. At all times mentioned herein, the defendants, CooperSurgical, Cooper Companies, Femcare and/or Utah Medical, had actual knowledge of the defective and dangerous condition of the Filshie Clips and failed to take any action to cure such defective and dangerous conditions.

9. Such actions were employed when the defendants, CooperSurgical, Cooper Companies, Femcare and/or Utah Medical, manufactured, imported and distributed the Filshie Clips in trade and commerce.

10. The defendants, CooperSurgical, Cooper Companies, Femcare and/or Utah Medical, engaged in wrongful conduct while at the same time obtaining, under false pretenses, moneys from the plaintiff for the Filshie Clips that were surgically placed into the plaintiff, and that would not have been paid for had the defendant, Cooper Surgical, not engaged in unfair and deceptive conduct.

11. The defendants, CooperSurgical, Cooper Companies, Femcare and/or Utah Medical's deceptive acts or practices impacted the public interest and have the potential for repetition. As set forth above, the defendant, Cooper Surgical's deceptive acts or practices have harmed numerous individuals in a similar fashion, thus making it likely that such deceptive acts or practices will continue to occur absent deterrence. Furthermore, the defendants, CooperSurgical, Cooper Companies, Femcare and/or Utah Medical's procedures in permitting and encouraging such deceptive acts or practices create a potential for repetition of the unfair and deceptive acts.

12. The cumulative and indivisible nature of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical's conduct directly and proximately caused the financial

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injuries suffered by the plaintiff. The cumulative effect of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical's conduct directed at patients, physicians and consumers, including the plaintiff and her physicians, was to create demand for and promote the sale of the Filshie Clips. Each aspect of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical's conduct combined to artificially create sales of the Filshie Clips.

13. The defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, had a statutory duty to refrain from unfair or deceptive acts or trade practices in the design, labeling, development, manufacture, promotion, and sale of the Filshie Clips. This duty parallels the FDCA's requirement for truthfully and completely reporting incidents of adverse events, and if necessary, obtaining approval for changes in the design, manufacture, and warnings/marketing approved by the FDA. However, under the same facts, the plaintiff is able to establish a recoverable claim under the Connecticut Unfair Practices Act, even in the absence of federal law.

14. The plaintiff and her implanting physicians and surgeons relied upon the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, missrepresentations and omissions in determining which product and/or procedure to undergo and/or perform.

15. Had the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, not engaged in the unfair or deceptive conduct described above, the plaintiff would not have consented to the method of bilateral tubal ligation, purchased and/or paid for the Filshie Clips, and would not have incurred related medical costs.

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16. The defendants, CooperSurgical, Cooper Companies, Femcare and/or Utah Medical's actions constitute unfair and deceptive acts and trade practices in violation of the Connecticut Unfair Practices Act.

17. On or about September 13, 2018, the plaintiff, Kasandra Walsh underwent a tubal ligation procedure at Banner Desert Hospital in Mesa, Arizona.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kasandra Walsh, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Kasandra Walsh, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. Sometime in September 2018, the plaintiff, Kasandra Walsh, began experiencing abdominal pain, which progressed with time. The pain would be sharp enough that she had trouble exercising or running. Eventually she experienced difficulty standing due to the pain.

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Said plaintiff sought medical attention on several occasions, but each time, the medical professionals were not able to find the source of her pain.

23. In or about September 2020, the plaintiff, Kasandra Walsh, underwent laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

24. Said severe, painful and permanent injuries suffered by the plaintiff, Kasandra Walsh, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

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(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

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(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

25. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare an/or Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kasandra Walsh, was forced to undergo laparoscopic surgery to determine the cause of her pain. Said surgical procedure revealed that the Filshie Clips had migrated and were displaced. One was on her left fallopian tube but broken, the other was embedded on her uterus. The Filshie Clips were successfully removed, however, unfortunately, the plaintiff's fallopian tubes were also removed.

26. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kasandra Walsh, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic

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studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

27. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kasandra Walsh, sustained a permanent impairment to her uterus.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kasandra Walsh, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kasandra Walsh's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTY-SIXTH COUNT (HANNAH LAMB v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a)):

1. At all times mentioned herein, the plaintiff Hannah Lamb was and is a resident of Ocala, Florida.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

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17. On or about June 24, 2014, the plaintiff, Hannah Lamb, underwent a tubal ligation procedure at Seven Rivers Regional Medical Center in Crystal River, Florida.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by Defendant, Utah Medical Products, Inc.

19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Hannah Lamb, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Hannah Lamb, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In or around 2016, Hannah Lamb began experiencing severe pelvic and abdominal pain, along with irregular menstrual cycles, blood clotting, ovarian cysts, painful intercourse, and abdominal bleeding. She sought medical attention several times throughout the years, but her doctors were unable to find the source of her pain.

23. On or about February 22, 2021, after radiological imaging, Hannah Lamb's doctor confirmed her Filshie Clips had migrated and were displaced. Two were in her abdomen and one

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was near the ovary.

24. Hannah Lamb continues to experience severe abdominal and pelvic pain to this day.

25. Hannah Lamb also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Hannah Lamb, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

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(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

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(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Hannah Lamb, was forced to undergo radiological imaging to determine the cause of her pain, which revealed that the Filshie Clips had migrated and were displaced. Two were in her abdomen and one was near the ovary. She continues to experience severe abdominal and pelvic pain to this day and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Hannah Lamb, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

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29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Hannah Lamb, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Hannah Lamb, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Hannah Lamb's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTY-SEVENTH COUNT (KYENNA HAMILTON v. ALL DEFENDANTS-PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a)):

1. At all times mentioned herein, the plaintiff Kyenna Hamilton was and is a resident of Charlotte, North Carolina.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

17. On or about March 6, 2015, the plaintiff, Kyenna Hamilton, underwent a tubal ligation procedure at Coastal Carolina Hospital in Hardeeville, South Carolina.

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18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Kyenna Hamilton, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Kyenna Hamilton, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In or around 2017, Kyenna Hamilton began experiencing severe pelvic and abdominal pain. The pain became so severe that it impacts her ability to walk or move. She consulted with her healthcare providers who were unable to find the source of her pain.

23. On or about March 31, 2021, after radiological imaging, Kyenna Hamilton's doctor confirmed her Filshie Clips had migrated and were displaced.

24. She continues to experience severe abdominal and pelvic pain to this day, making it difficult to function and do day-to-day activities.

25. Kyenna Hamilton also continues to live under the specter of having the foreign

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bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Kyenna Hamilton, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

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(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(o) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(p) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(q) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kyenna Hamilton, was forced to undergo radiological imaging after she experienced pain so severe that it impacted her ability to walk or move. Said imaging revealed that the Filshie Clips had migrated and were displaced. She continues to experience severe abdominal and pelvic pain and lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kyenna Hamilton, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent

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agents, servants, and/or employees, the plaintiff, Kyenna Hamilton, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kyenna Hamilton, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Kyenna Hamilton's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTY-EIGHTH COUNT (CRYSTAL STEWART v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a):

1. At all times mentioned herein, the plaintiff Crystal Stewart was and is a resident of Akron, Ohio.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

17. On or about November 13, 2015, the plaintiff, Crystal Stewart, underwent a tubal ligation procedure at Cleveland Clinic Akron General in Akron, Ohio.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

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19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Crystal Stewart, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Crystal Stewart, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In or around 2015, Crystal Stewart began experiencing intense pelvic pain, including cramping, burning, and throbbing. She consulted with her healthcare providers who were unable to find the source of her pain. Doctors believed that her pain was due to endometriosis.

23. On or about July 6, 2021, following radiology imaging, Crystal Stewart's doctors confirmed that her right Filshie Clip was displaced. In June of 2022, Crystal Stewart underwent surgery related to her endometriosis diagnosis. During surgery, Crystal Stewart's doctor confirmed that her Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed.

24. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found

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during her last surgery.

25. Crystal Stewart also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Crystal Stewart, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

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(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Crystal Stewart, was forced to endure intense pelvic pain, including cramping, burning, and throbbing. She underwent radiology imaging that confirmed her right Filshie Clip was displaced and during Crystal Stewart's surgery related to her endometriosis diagnosis, her doctor confirmed that the Filshie Clip had migrated and was displaced on the right side of her anterior lower abdomen and had embedded in her pelvic wall. This Filshie Clip was removed. Crystal Stewart continues to experience chronic and throbbing pelvic pain and cramping. This is likely due to the other Filshie Clips that remain her body, which was not found during her last surgery and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Crystal Stewart, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic

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studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Crystal Stewart, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Crystal Stewart, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Crystal Stewart's ability to carry on life's activities has been and will be permanently and severely curtailed.

FORTY-NINTH COUNT (LORETTA FERRIS v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a)

1. At all times mentioned herein, the plaintiff Loretta Ferris was and is a resident of Inglis, Florida.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

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17. On or about August 8, 2013, the plaintiff, Loretta Ferris, underwent a tubal ligation procedure at Seven Rivers Hospital in Crystal River, Florida.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Loretta Ferris, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Loretta Ferris, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. Within months of resuming sexual activity, Ms. Ferris began experiencing abdominal pain. She started to experience heavy and painful menstrual cycles and large blood clots. Within six years, the pain became debilitating and led to headaches, nausea and low-grade fevers. She consulted with her healthcare providers who were unable to find the source of her pain.

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23. In early 2022, following radiological imaging, Ms. Ferris's doctor confirmed her Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy, however, her doctors were unable to locate the migrated Filshie Clips.

24. She continues to experience severe abdominal pain to this day, along with nausea, headaches, cold sweats, and loss of consciousness.

25. Ms. Ferris also continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Loretta Ferris, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

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(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

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(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Loretta Ferris, was forced to undergo radiological imaging after she experienced heavy and painful menstrual cycles and large blood clots, debilitating pain, headaches, nausea and low-grade fevers. Said imaging revealed that the Filshie Clips had migrated and were displaced. On June 16, 2022, she underwent a partial hysterectomy but the doctors were unable to locate the migrated Filshie Clips. She continues to experience severe abdominal pain, nausea, headaches, cold sweats, and loss of consciousness, and she lives under the specter of having the foreign bodies migrating through her pelvic area and fear of having to undergo surgery as a result of these products.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent

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agents, servants, and/or employees, the plaintiff, Loretta Ferris, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Loretta Ferris, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Loretta Ferris, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Loretta Ferris' ability to carry on life's activities has been and will be permanently and severely curtailed.

FIFTIETH COUNT (SHANTAIL THOMAS v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a)

1. At all times mentioned herein, the plaintiff Shantail Thomas was and is a resident of Atmore, Alabama.

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2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

17. On or about April 1, 2019, the plaintiff, Shantail Thomas, underwent a tubal ligation procedure at South Baldwin Regional Medical Center in Foley, Arizona.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Shantail Thomas, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Shantail Thomas, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In March 2020, Ms. Thomas began experiencing severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain.

23. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor

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noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

24. Said severe, painful and permanent injuries suffered by the plaintiff, Shantail Thomas, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

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(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

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(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

25. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Shantail Thomas, experienced severe abdominal pain, cramping, shortness of breath, heavy periods, blood clots, and extreme bloating. She consulted with her healthcare providers who were unable to find the source of her pain. In June of 2022, Ms. Thomas delivered a baby via cesarean section. Her doctor noted that a Filshie Clip from previous tubal ligation had migrated and was encased in omentum. The doctors removed the migrated Filshie Clip.

26. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Shantail Thomas, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

27. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent

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agents, servants, and/or employees, the plaintiff, Shantail Thomas, sustained a permanent impairment to her uterus.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Shantail Thomas, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Shantail Thomas' ability to carry on life's activities has been and will be permanently and severely curtailed.

FIFTY-FIRST COUNT (MEGHAN REHAHN v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b (a)

1. At all times mentioned herein, the plaintiff Meghan Rehahn was and is a resident of Ecorse, Michigan.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

17. On or about May 16, 2018, the plaintiff, Megan Rehahn, underwent a tubal ligation procedure at Garden City Hospital in Garden City, Michigan.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

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19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Meghan Rehahn, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Meghan Rehahn, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In 2018, Ms. Rehahn began experiencing severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. She consulted with her healthcare providers who were unable to find the source of her pain. In fact, she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not).

23. In July of 2022, following radiological imaging, Ms. Rehahn's doctor who informed her that her Filshie Clips migrated and were displaced.

24. She continues to experience extreme pain to this day.

25. Ms. Rehahn continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Megan

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Rehahn, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

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(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

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(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Megan Rehahn, experienced severe abdominal pain, painful periods, blood clots, headaches, pain in her hip and back. Her healthcare providers who were unable to find the source of her pain and she underwent surgery to remove her gallbladder, believing that would relieve her pain (it did not). She was forced to have radiological imaging, after which Ms. Rehahn's doctor informed her that her Filshie Clips migrated and were displaced. She continues to experience extreme pain to this day and she continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Meghan Rehahn, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent

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agents, servants, and/or employees, the plaintiff, Meghan Rehahn, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Meghan Rehahn, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Meghan Rehahn's ability to carry on life's activities has been and will be permanently and severely curtailed.

FIFTY-SECOND COUNT (ANGELA BLAHNIK v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a)

1. At all times mentioned herein, the plaintiff Angela Blahnik was and is a resident of Panama City Beach, Florida.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

17. In or about 2016, the plaintiff, Angela Blahnik, underwent a tubal ligation procedure at the Panama City Surgery Center in Panama City, Florida.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

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19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Angela Blahnik, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Angela Blahnik, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In or around 2017, Ms. Blahnik began experiencing severe abdominal pain and extreme heavy cycles. She consulted with her healthcare providers who were unable to find the source of her pain.

23. On or about July 22, 2022, following radiological imaging, Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced.

24. She continues to experience pain to this day.

25. Ms. Blahnik continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Angela Blahnik, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical,

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Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

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(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

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27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Angela Blahnik, began experiencing severe abdominal pain and extreme heavy cycles and her healthcare providers were unable to find the source of her pain. She was also forced to have radiological imaging, after which Ms. Blahnik's medical provider confirmed her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Angela Blahnik, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Angela Blahnik, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Angela Blahnik, has and will continue to suffer

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great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Angela Blahnik's ability to carry on life's activities has been and will be permanently and severely curtailed.

FIFTY-THIRD COUNT (MELISSA WATTERS v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a)):

1. At all times mentioned herein, the plaintiff Melissa Watters was a resident of Princeton, North Carolina, and is now a resident of Selma, North Carolina.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

17. On or about April 4, 2013, the plaintiff, Melissa Watters, underwent a tubal ligation procedure at University of North Carolina in Chapel Hill, North Carolina.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Melissa Watters, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Melissa Watters, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the

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procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In or around early 2022, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time.

23. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments.

24. On or about February 8, 2022, Ms. Watters's doctor discovered a migrated Filshie Clip via ultrasound and CT scan. Plaintiff was informed the Filshie Clips remained in her body and one was displaced, having migrated from its original placement.

25. In October 2022, Ms. Watters underwent two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip. Those Filshie Clips were successfully removed.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Melissa Watters, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants,

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and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

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(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

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27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Ms. Watters began experiencing soreness, cramping, and sharp pains in her lower abdominal region extending to her lower back. She also experiences nausea, pain in her pelvis, has trouble going to the restroom, and is unable to stand for long periods of time. The pain is so severe that Ms. Watters is no longer able to comfortably ride in a car because the vibrations and upward movements are simply too painful. For a period of time, Ms. Watters was bedridden, only traveling to use the restroom or attend doctor's appointments. Ms. Watters was forced to undergo two separate surgeries: one to remove a Filshie Clip on her left fallopian tube and a second to remove her migrated Filshie Clip.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Melissa Watters, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Melissa Watter, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent

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agents, servants, and/or employees, the plaintiff, Melissa Watter, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Melissa Watters' ability to carry on life's activities has been and will be permanently and severely curtailed.

FIFTY-FOURTH COUNT (STEPHANIE MENDEZ v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a)):

1. At all times mentioned herein, the plaintiff Stephanie Mendez was and is a resident of Davenport, Florida.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

17. On or about November 28, 2016, the plaintiff, Stephanie Mendez, underwent a tubal ligation procedure at AdventHealth Winter Park in Winter Park, Florida.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Stephanie Mendez, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

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20. The plaintiff, Stephanie Mendez, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In or around 2017, Ms. Mendez began experiencing excruciating pain, particularly in her abdominal area. She consulted her doctors who were not able to find the source of her pain.

23. On or around November 1, 2022, following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed.

24. She was also informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy.

25. She continues to experience pain to this day.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Stephanie Mendez, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b(a), and in violation of federal and/or state regulations in one or more of the following respects:

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(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie

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Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants,

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and/or employees, the plaintiff, Stephanie Mendez, experienced excruciating pain, particularly in her abdominal area and her doctors were not able to find the source of her pain. Following surgery, Ms. Mendez's medical provider confirmed her Filshie Clips had migrated and were displaced. The Filshie Clips were removed and she was informed that the Filshie Clips caused hydrosalpinx in both fallopian tubes. She is now scheduled for a hysterectomy. She continues to experience pain to this day.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Stephanie Mendez, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Stephanie Mendez, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Stephanie Mendez, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

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31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Stephanie Mendez's ability to carry on life's activities has been and will be permanently and severely curtailed.

FIFTY-FIFTH COUNT (SARA VANKAMPEN v. ALL DEFENDANTS- PURSUANT TO CONNECTICUT UNFAIR TRADE PRACTICES ACT. § 42-110b(a)):

1. At all times mentioned herein, the plaintiff Sara VanKampen was and is a resident of Gainesville, Florida.

2-16. Paragraphs two through sixteen of the preceding count are hereby incorporated and realleged as paragraphs two through sixteen of this count.

17. On or about June 28, 2017, the plaintiff, Sara VanKampen, underwent a tubal ligation procedure at North Florida Regional in Gainesville, Florida.

18. At all times mentioned herein, the tubal ligation procedure used Filshie Clips. The Filshie Clips were manufactured, designed and/or distributed by the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical.

19. The Defendants' purposeful and fraudulent acts of concealment have kept the plaintiff, Sara VanKampen, ignorant of vital information essential to the pursuit of her claims, without any fault or lack of diligence on Plaintiff's part.

20. The plaintiff, Sara VanKampen, was provided with a Disclosure and Consent for medical and surgical procedures, which included generic risks and hazards associated with the procedure. No mention was made of the risk of migration and the appurtenant damages that

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could be caused by the Filshie Clips. The only risks mentioned were associated with the ligation procedure itself.

21. At all times mentioned herein, and upon information and belief to date, the product information sheet supplied to her healthcare providers made no mention of the actual rate of migration known of the Filshie Clips.

22. In 2022, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches. She consulted with numerous doctors who were unable to find the source of her pain.

23. On or around December 24, 2022, following radiological imaging, Ms. VanKampen's medical provider confirmed her Filshie Clips had migrated and were displaced.

24. She continues to experience pain to this day.

25. Ms. VanKampen continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

26. Said severe, painful and permanent injuries suffered by the plaintiff, Sara VanKampen, were caused by the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, pursuant to Connecticut Unfair Trade Practices Act. § 42-110b (a), and in violation of federal and/or state regulations in one or more of the following respects:

(a) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous;

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(b) In that they placed onto the market and into the stream of commerce a product that was defective and unreasonably dangerous in reckless disregard for the safety of product consumers;

(c) In that they breached an implied warranty of merchantability as said "Filshie Clips" was not of merchantable quality nor fit for its intended purpose;

(d) In that they breached its implied warranty that said "Filshie Clips" was safe and effective for its intended use;

(e) In that they failed to properly test the "Filshie Clips" to determine whether or not the product was safe for its intended use;

(f) In that they misrepresented to the plaintiff, the plaintiff's healthcare providers and/or the general health care community that said "Filshie Clips" was safe for its intended use;

(g) In that they failed to provide adequate instructions, guidelines, and safety precautions, to those persons to whom it was reasonably foreseeable would recommend, use, implant and remove the "Filshie Clips";

(h) In that they failed to use reasonable and prudent care in the design, research, manufacture, and development of "Filshie Clips" so as to avoid the risk of serious harm associated with the use of the "Filshie Clips";

(i) In that they failed to provide adequate warnings and/or instructions to the plaintiff, the plaintiff's healthcare providers and/or the general health care community about "Filshie Clip's" substantially dangerous condition or about facts making the product likely to be dangerous, including pre-and post-sale;

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(j) In that they failed to warn and instruct the Plaintiff, the plaintiff's healthcare providers and/or the general health care community about the inadequate research and testing of the Filshie Clips, and the complete lack of a safe, effective procedure for preventing migration;

(k) In that the "Filshie Clips" was defectively designed for its intended purpose;

(l) In that they represented that "Filshie Clips" were safe for their intended use when in fact, the defendant knew and should have known the product was not safe for its intended purpose;

(m) In that they failed to establish an adequate quality assurance program used in the manufacturing of the "Filshie Clips";

(n) In that they failed to adequately and correctly report safety information related to the "Filshie Clip" product resulting in inadequate warnings;

(o) In that they failed to provide adequate and continuous warnings about the inherent danger of migration with "Filshie Clips" after they had been placed on the fallopian tubes;

(p) In that they failed to manufacture the "Filshie Clips" in conformity with the manufacturer's design or in conformity with the approved design that the defendants had submitted to the FDA.

27. As a result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Ms. VanKampen began experiencing pelvic and back pain, nausea and headaches and her doctors who were unable to find the source of her pain. Ms.

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VanKampen had to have radiological imaging to confirm her Filshie Clips had migrated and were displaced. She continues to experience pain to this day and continues to live under the specter of having the foreign bodies migrating through her pelvic area and the fear of having to undergo surgery as a result of these products.

28. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Sara VanKampen, has been required to expend and will be required to expend considerable sums of money for hospitalization, radiographic studies, surgeries and/or medical procedures in order to remove the migrated Filshie Clips, medical care and treatment and medications all to her financial loss.

29. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Sara VanKampen, sustained a permanent impairment to her uterus.

30. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent agents, servants, and/or employees, the plaintiff, Sara VanKampen, has and will continue to suffer great physical, mental and emotional pain and anguish and has been and will be sick, sore and disabled for a long period of time.

31. As a further result of the unfair or deceptive conduct of the defendants, CooperSurgical, Cooper Companies, Femcare and Utah Medical, through its agents, apparent

agents, servants, and/or employees, the plaintiff, Sara VanKampen's ability to carry on life's activities has been and will be permanently and severely curtailed.

THE PLAINTIFFS,

By_____
Russell J. Berkowitz
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RETURN DATE: May 9, 2023	**:**	**SUPERIOR COURT**
KASANDRA WALSH **HANNAH LAMB** **KYENNA HAMILTON** **CRYSTAL STEWART** **LORETTA FERRIS** **SHANTAIL THOMAS** **MEGAN REHAHN** **ANGELA BLAHNIK** **MELISSA WATTERS** **STEPHANIE MENDEZ** **SARA VANKAMPEN**		
	:	**J.D. OF FAIRFIELD**
V.	**:**	**AT BRIDGEPORT**
COOPERSURGICAL, INC., **COOPER COMPANIES, INC.,** **FEMCARE, LTD. – UK SUBSIDIARY OF** **UTAH MEDICAL PRODUCTS, INC., and** **UTAH MEDICAL PRODUCTS, INC.**	**:**	**APRIL 3, 2023**

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CLAIM FOR RELIEF

WHEREFORE, the plaintiff claims:

1. Money damages as to counts one through forty-nine pursuant to Connecticut General Statutes § 52-572n.
2. Money damages as to counts fifty-one through fifty-five pursuant to Connecticut General Statutes § 42-110b.
3. Costs;
4. Attorney's fees;
5. Interest;
6. Punitive Damages; and

7. Such other relief as the Court deems just and proper.

THE PLAINTIFFS,

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	:	**J.D. OF FAIRFIELD**
V.	**:**	**AT BRIDGEPORT**
COOPERSURGICAL, INC., **COOPER COMPANIES, INC.,** **FEMCARE, LTD. – UK SUBSIDIARY OF** **UTAH MEDICAL PRODUCTS, INC., and** **UTAH MEDICAL PRODUCTS, INC.**	**:**	**APRIL 4, 2023**

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STATEMENT OF AMOUNT IN DEMAND

The amount in demand, exclusive of interests and costs, is in excess of Fifteen Thousand ($15,000.00) Dollars.

THE PLAINTIFFS,

By _____

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