

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**JONI S. BYNUM, ROBIN COBURN,
AND JAMES COBURN
INDIVIDUALLY AND ON BEHALF
OF A PROPOSED CLASS
Plaintiff,**

v.

**LLT MANAGEMENT LLC F/K/A LTL
MANAGEMENT, LLC; JOHNSON &
JOHNSON; NEW JJCI;
JOHNSON & JOHNSON HOLDCO
(NA) INC.; JANSSEN
PHARMACEUTICALS, INC.;
KENVUE INC.; J&J SERVICES, INC.;
AND JOHN DOES 1-100,
Defendants.**

**JURY TRIAL DEMANDED
ON ALL CLAIMS TRIABLE
TO A JURY**

Case No. 24-cv-07065

NOTICE OF MOTION

**(ORAL ARGUMENT
REQUESTED)**

PLEASE TAKE NOTICE that, at such date and time set by the Court, Defendants LLT Management LLC f/k/a LTL Management, LLC (“LLT”), Johnson & Johnson, New JJCI, Johnson & Johnson Holdco (NA) Inc.; Janssen Pharmaceuticals, Inc., Kenvue Inc.; and J&J Services, Inc. (collectively, “Defendants”) will bring Defendants’ Motion to Strike Plaintiffs’ Class Allegations and Dismiss Medical Monitoring Claims, dated August 21, 2024, before the Honorable Michael A. Shipp at the Clarkson S. Fisher Building & U.S. Courthouse,

402 East State Street, Courtroom 4W, Trenton, NJ 08608. For the reasons set forth in Defendants Memorandum of Law in Support of Motion to Strike Plaintiffs' Class Allegations and Dismiss Medical Monitoring Claims, Defendants will move this Court for (i) an order dismissing the complaint; and (ii) such other and further relief the Court deems just and equitable.

PLEASE TAKE FURTHER NOTICE that, in support of their motion, Defendants shall rely upon the Memorandum of Law submitted herewith, any reply submissions made hereafter, and all prior pleadings and proceedings herein.

PLEASE TAKE FURTHER NOTICE that a form of Order is annexed hereto.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

Dated: August 21, 2024

Respectfully submitted,

/s/ Susan M. Sharko

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Johnson; New JJCI; Johnson &
Johnson Holdco (NA) Inc.; Janssen
Pharmaceuticals, Inc.; Kenvue Inc.;
J&J Services, Inc.;*