

IN THE INTERMEDIATE COURT OF APPEALS OF WEST VIRGINIA

A.N.C., as next friend of J.J.S., a minor child under the age of 18,
Plaintiff Below, Petitioner,

vs.) No. 23-ICA-276

Johnson & Johnson, *et al.*,
Defendants Below, Respondents

EXHIBIT A
VERIFIED STATEMENT IN SUPPORT OF APPLICATION OF
LAUREN E. O'DONNELL FOR *PRO HAC VICE* ADMISSION

I, Lauren E. O'Donnell, hereby submit the following verified statement in support of the preceding Motion for Admission *Pro Hac Vice*,

1. The action, suit, proceeding or other matter which is the subject of the application:

A.N.C., as next friend of J.J.S., a minor child under the age of 18, v. Johnson & Johnson, et al., In the Intermediate Court of Appeals of West Virginia,
No. 23-ICA-276

2. I hereby verify that I am a member in good standing with the bars of the Commonwealth of Pennsylvania and the State of New Jersey, and that I have not been disciplined in said jurisdictions within the preceding 24 months. My Attorney Registration in the Commonwealth of Pennsylvania is 306890 and New Jersey is 013292009.

3. The name, address and telephone number of the registration or disciplinary agency of all state courts, the District of Columbia or of the country in which such person is admitted:

The Supreme Court of Pennsylvania
Pennsylvania Judicial Center
601 Commonwealth Ave., Suite 4500
PO Box 62575
Harrisburg, PA 17106
(717) 787-6181

New Jersey Board of Bar Examiners
25 West Market Street
8th Floor, North Wing
Trenton, NJ 08611
(609) 984-2111

4. I am also admitted to practice in the U. S. District Court for the District of New Jersey; U. S. District Court for the Eastern District of Pennsylvania; the U. S. Court of Appeals for the Third Circuit; and U. S. Court of Appeals for the Eleventh Circuit.

5. The name and address of the member of the West Virginia State Bar who will be a responsible local attorney in the matter:

Keith A. Jones. (WVSB # 1923)
HENDRICKSON & LONG, PLLC
214 Capitol Street
P.O. Box 11070
Charleston, WV 25339
Telephone: (304) 346-5500

6. I was admitted *pro hac vice* by Order dated March 22, 2023 entered by the Circuit Court of Kanawha County, Civil Action no. 22-C-9000 NAS (Mass Litigation Panel) [Transaction ID no. 69607988], which Order applied to the following matters:

Travis Blankenship, Next Friend and Guardian of minor child Z.D.B. v. McKesson Corporation, et al. (Civil Action No. 22-C-5 MSH);

Scott Otwell, Next Friend and Guardian of minor child R.G.O. v. McKesson Corporation, et al. (Civil Action No. 22-C-20 MSH);

Tammy Boswell, Next Friend and Guardian of minor children B.E.B. and S.F.B. v. McKesson Corporation, et al. (Civil Action No. 22-C-21 MSH);

Timothy Lambert, Next Friend and Guardian of minor children M.D.L. and T.J.L. v. McKesson Corporation, et al. (Civil Action No. 22-C-22 MSH);

Kelly Mangus, Next Friend and Guardian of minor child L.C.M. v. McKesson Corporation, et al. (Civil Action No. 22-C-23 MSH);

Stacey Harris, Next Friend and Guardian of minor child N.M.B. v. McKesson Corporation, et al. (Civil Action No. 22-C-24 MSH);

Cynthia Woolwine, Next Friend and Guardian of minor children E.G.W. and B.D.W. v. McKesson Corporation, et al. (Civil Action No. 22-C-25 MSH);

Angela Whited, Next Friend and Guardian of minor children C.D.W. and C.G.W. v. McKesson Corporation, et al. (Civil Action No. 22-C-26 MSH);

Floretta Adkins, Next Friend and Guardian of minor child M.J.A. v. McKesson Corporation, et al. (Civil Action No. 22-C-27 MSH);

Dianna Brooks, Next Friend and Guardian of minor child W.A.R. v. McKesson Corporation, et al. (Civil Action No. 22-C-28 MSH);

Jacqueline Adams, Next Friend and Guardian of minor children S.D.L. and H.G.L. v. McKesson Corporation, et al. (Civil Action No. 22-C-29 MSH);

Stacey Anderson, Next Friend and Guardian of minor children A.L.A. and T.L.A. v. McKesson Corporation, et al. (Civil Action No. 22-C-30 MSH);

Thomas Paynter, Next Friend and Guardian of minor child Z.N.B. v. McKesson Corporation, et al. (Civil Action No. 22-C-31 MSH);

Patricia Fuller, Next Friend and Guardian of minor child A.J.F. v. McKesson Corporation, et al. (Civil Action No. 22-C-32 MSH);

Donna Johnson, Next Friend and Guardian of minor child L.M.J. v. McKesson Corporation, et al. (Civil Action No. 22-C-33 MSH);

Brandy Swift, Next Friend and Guardian of minor children S.R.S., M.K.S. and J.A.S. v. McKesson Corporation, et al. (Civil Action No. 22-C-34 MSH);

Stacy Stacey, Next Friend and Guardian of minor child T.K.L. v. McKesson Corporation, et al. (Civil Action No. 22-C-35 MSH);

Roger Johnson, Next Friend and Guardian of minor child S.A.J. v. McKesson Corporation, et al. (Civil Action No. 22-C-36 MSH);

A.N.C. as Next Friend of J.J.S., a minor child under the age of 18 v. Johnson & Johnson, et al. (Civil Action No. 22-C-73 MSH); and

7. Other than my admission *pro hac vice* in the instant matter in the court below and those matters listed in the preceding paragraph, I have not been involved in any matters before West Virginia tribunals or bodies in the preceding 24 months.

8. All matters before West Virginia tribunals or bodies in which any member of the petitioner's firm, partnership, corporation, or other operating entity is or has been involved in the preceding 24 months:

See Attachments A and B.

9. I agree to comply with all laws, rules and regulations of West Virginia state and local governments, where applicable, including taxing authorities and any standards for pro bono civil and criminal indigent defense legal services.

10. I hereby verify that the fee of three-hundred fifty dollars (\$350) has been paid to the West Virginia State Bar for each of the above captioned matters.

The Verified Statement of Lauren E. O'Donnell is attached hereto as Exhibit A and submitted herewith in support of this Motion.

Dated: September 14, 2023

Respectfully submitted,

/s/ Lauren E. O'Donnell

Lauren E. O'Donnell

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

Phone: (215) 569-5735

Fax: (215) 832-5735

Email: lauren.odonnell@blankrome.com

Counsel for Anda, Inc.

Endorsed by: /s/ Keith A. Jones.

Keith A. Jones (WVSB # 1923)

HENDRICKSON & LONG, PLLC

P.O. Box 11070

Charleston, WV 25339

Telephone: (304) 346-5500

Facsimile: (304) 346-5515

Email: kjones@handl.com

VERIFICATION

Lauren E. O'Donnell, Applicant named in the foregoing Verified Statement in Support of Application of Lauren E. O'Donnell, for *Pro Hac Vice* Admission, after being first duly sworn, says that statements contained therein are true, except insofar as they are stated to be upon information, and that insofar as they are therein stated to be upon information, he verily believes them to be true.



Lauren E. O'Donnell

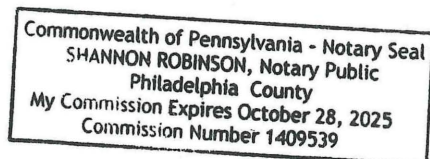
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Subscribed and sworn to before me
on this 14th day of September 2023



Notary Public

(seal)



ATTACHMENT A

**BLANK ROME LLP – MATTERS BEFORE
WEST VIRGINIA TRIBUNALS OR BODIES IN THE PRECEDING 24 MONTHS**

Court Tribunal or Body	Case Caption or Matter	Docket No.	BR Attorney(s)
Circuit Court of Kanawha County, WV	<i>Travis Blankenship, Next Friend and Guardian of minor child Z.D.B. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Scott Otwell, Next Friend and Guardian of minor child R.G.O. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Tammy Boswell, Next Friend and Guardian of minor children B.E.B. and S.F.B. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Timothy Lambert, Next Friend and Guardian of minor children M.D.L. and T.J.L. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Kelly Mangus, Next Friend and Guardian of minor child L.C.M. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Stacey Harris, Next Friend and Guardian of minor child N.M.B. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Cynthia Woolwine, Next Friend and Guardian of minor children E.G.W. and B.D.W. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Angela Whited, Next Friend and Guardian of minor children C.D.W. and C.G.W. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Floretta Adkins, Next Friend and Guardian of minor child M.J.A. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Dianna Brooks, Next Friend and Guardian of minor child W.A.R. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Jacqueline Adams, Next Friend and Guardian of minor children S.D.L. and H.G.L. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O’Donnell

Circuit Court of Kanawha County, WV	<i>Stacey Anderson, Next Friend and Guardian of minor children A.L.A. and T.L.A. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Thomas Paynter, Next Friend and Guardian of minor child Z.N.B. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Patricia Fuller, Next Friend and Guardian of minor child A.J.F. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Donna Johnson, Next Friend and Guardian of minor child L.M.J. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Brandy Swift, Next Friend and Guardian of minor children S.R.S., M.K.S. and J.A.S. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Stacy Stacey, Next Friend and Guardian of minor child T.K.L. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Roger Johnson, Next Friend and Guardian of minor child S.A.J. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>A.N.C., as Next Friend of J.J.S., a minor child under the age of 18 v. Johnson & Johnson, et al.</i>	22-C-9000 NAS	Terry M. Henry Lauren E. O'Donnell
N.D. W. Va.	<i>Darryl Beans v. RoundPoint Mortgage Servicing, LLC, et al.</i>	3:23-cv-109	Robert L. Dawson
N.D. W. Va.	<i>Edge v. Roundpoint Mortgage Servicing Corporation</i>	1:21-cv-00122	Edward Chang* Cheryl Chang Kevin M. Eddy
S.D. W. Va.	<i>Dameron v. McKesson Corporation, et al.</i>	5:20-cv-00492	Kevin M. Eddy
S.D. W. Va.	<i>Hayworth, et al. v. Roundpoint Mortgage Servicing Corporation, et al.</i>	5:20-cv-00071	Kevin M. Eddy
S.D. W. Va.	<i>Carlton & Harris Chiropractic, Inc. v. PDR Network, LLC, et al.</i>	3:15-cv-14887	Kevin M. Eddy
S.D. W. Va.	<i>In re: C. R. Bard, Inc., Pelvic Repair System Products Liability Litigation</i>	2:10-md-02187	Andrew M. Williamson*
S.D. W. Va.	<i>Good et al v. American Water Works Company, Inc. et al.</i>	2:14-cv-01374	Deborah E. Greenspan Marquel S. Jordan Robert Scott Lance D. Leisure*
S.D. W. Va.	<i>In re: American Medical Systems, Inc., Pelvic Repair System Products Liability Litigation</i>	2:12-md-02325	Andrew M. Williamson*

S.D. W. Va.	<i>In re: Coloplast Corp., Pelvic Support Systems Products Liability Litigation</i>	2:12-md-02387	Andrew M. Williamson*
S.D. W. Va.	<i>In re: Neomedic Pelvic Repair System Products Liability Litigation</i>	2:14-md-02511	Andrew M. Williamson*
Circuit Court of Mercer County, WV	<i>Ariel Lambert v. Bank of America</i>	CC-28-2022-C-119	Robert L. Dawson
Circuit Court of Marshall County, WV	<i>Covestro, LLC v. Axiall, Inc., et al.</i>	18-c-202	Kevin Eddy Jayme Butcher Joe Culleiton*

* No longer at the firm.

ATTACHMENT B

**BLANK ROME LLP – LAUREN E. O’DONNELL MATTERS BEFORE
WEST VIRGINIA TRIBUNALS OR BODIES IN THE PRECEDING 24 MONTHS**

Court Tribunal or Body	Case Caption or Matter	Docket No.	BR Attorney(s)
Circuit Court of Kanawha County, WV	<i>Travis Blankenship, Next Friend and Guardian of minor child Z.D.B. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Scott Otwell, Next Friend and Guardian of minor child R.G.O. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Tammy Boswell, Next Friend and Guardian of minor children B.E.B. and S.F.B. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Timothy Lambert, Next Friend and Guardian of minor children M.D.L. and T.J.L. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Kelly Mangus, Next Friend and Guardian of minor child L.C.M. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Stacey Harris, Next Friend and Guardian of minor child N.M.B. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Cynthia Woolwine, Next Friend and Guardian of minor children E.G.W. and B.D.W. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Angela Whited, Next Friend and Guardian of minor children C.D.W. and C.G.W. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Floretta Adkins, Next Friend and Guardian of minor child M.J.A. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Dianna Brooks, Next Friend and Guardian of minor child W.A.R. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell
Circuit Court of Kanawha County, WV	<i>Jacqueline Adams, Next Friend and Guardian of minor children S.D.L. and H.G.L. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O’Donnell

Circuit Court of Kanawha County, WV	<i>Stacey Anderson, Next Friend and Guardian of minor children A.L.A. and T.L.A. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Thomas Paynter, Next Friend and Guardian of minor child Z.N.B. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Patricia Fuller, Next Friend and Guardian of minor child A.J.F. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Donna Johnson, Next Friend and Guardian of minor child L.M.J. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Brandy Swift, Next Friend and Guardian of minor children S.R.S., M.K.S. and J.A.S. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Stacy Stacey, Next Friend and Guardian of minor child T.K.L. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>Roger Johnson, Next Friend and Guardian of minor child S.A.J. v. McKesson Corporation, et al.</i>	22-C-9000 NAS	Lauren E. O'Donnell
Circuit Court of Kanawha County, WV	<i>A.N.C., as Next Friend of J.J.S., a minor child under the age of 18 v. Johnson & Johnson, et al.</i>	22-C-9000 NAS	Lauren E. O'Donnell