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DIANA BALDERRAMA AND GILBERT BALDERRAMA, Plaintiffs, v. JOHNSON & JOHNSON, JOHNSON & JOHNSON HOLDCO (NA) INC., KENVUE INC., JANSSEN PHARMACEUTICALS, INC., JOHNSON & JOHNSON CONSUMER INC., LLT MANAGEMENT L.L.C. f/k/a LTL MANAGEMENT L.L.C, ET AL., Defendants.	SUPERIOR COURT OF NEW JERSEY ATLANTIC COUNTY DOCKET NO. ATL-L-6540-14 **TALC-BASED POWDER PRODUCTS LITIGATION** **CASE NO. 300** CIVIL ACTION **DEFENDANTS' BRIEF IN OPPOSITION TO PLAINTIFFS' MOTION FOR *PRO HAC VICE* ADMISSION OF P. LEIGH O'DELL AND ANDY BIRCHFIELD**

INTRODUCTION

The Johnson & Johnson ("J&J") Defendants recognize the denial of a *pro hac vice* motion is not standard. As explained below, however, the circumstances of this litigation and the activities at issue are not consistent with the New Jersey Rules, and good cause exists to deny the *pro hac vice* applications of Beasley Allen partners P. Leigh O'Dell and Andy Birchfield. To do otherwise would be detrimental to the prompt, fair, and efficient administration of justice, and would be detrimental to the J&J Defendants' legitimate interests. This Court previously denied J&J's motion to disqualify Beasley Allen, and the appeal is currently pending. Order Denying Defendant's Motion for Order to Disqualify Beasley Allen at 1, *In re: Johnson and Johnson Talcum-Based Powder Products Litigation*, No. ATL-L-2648-15 (N.J. Super. Ct. Law Div. July 19, 2024). However, new facts have since emerged that support denial of Ms. O'Dell and Mr. Birchfield's motions for *pro hac vice* admission.

In Pecos River's bankruptcy proceeding, Mr. Birchfield and Beasley Allen certified under penalty of perjury that more than 11,000 clients had given informed consent to vote against J&J's over $10 billion prepackaged reorganization plan. *In re Red River Talc LLC*, No. 24-90505, 2025 WL 1029302, *26 (Bankr. S.D. Tex. Mar. 31, 2025). As the Bankruptcy Court found, however, the evidence showed that Beasley Allen had only received 3,000 affirmative responses. *Id.* The bankruptcy court ruled that all these votes were invalid. *Id.*

As part of this, Mr. Birchfield also certified that more than 5,000 voting clients had gynecological cancer, and—without any direction from those clients—that thousands of these clients purportedly voted to reject the plan. *Id.* At the same time, Mr. Birchfield testified that gynecological cancer claims are non-compensable in the tort system based on a lack of scientific support. *Id.* As the bankruptcy court put it: Mr. "Birchfield voted on behalf of clients, without their

consent, to reject payment under the Initial Plan even though he believes those clients will not and cannot be paid in the tort system." *Id.*

Additionally, Beasley Allen has maintained an improper relationship with James Conlan, a former J&J attorney with intimate knowledge of J&J's legal strategy regarding the talc litigation and bankruptcy. After leaving J&J's counsel team, Mr. Conlan partnered with Beasley Allen to pitch a $19 billion resolution plan to J&J based on a "settlement matrix" Mr. Conlan developed with attorneys from Beasley Allen, despite Mr. Conlan's ongoing ethical obligations to J&J, his former client. This improper alliance between Mr. Conlan and Beasley Allen attorneys further warrants denial of the *pro hac vice* applications for Ms. O'Dell and Mr. Birchfield.

FACTUAL BACKGROUND

A. The Bankruptcy Court Found that Counsel Submitted Clients' Votes Without Their Consent and That Were Contrary to Their Interests.

In May 2024, J&J announced a third proposed reorganization to resolve all current and future claims related to ovarian cancer arising from cosmetic talc litigation against J&J and its U.S. affiliates (accounting for 99.75% of the pending U.S. talc lawsuits against those companies, excluding mesothelioma cases).[1] Unlike the previous plans, this one gave talc claimants the power up front to decide whether it went forward. Specifically, J&J proposed what is called a "prepackaged" bankruptcy plan: If the plan did not receive 75% approval, J&J would not file a bankruptcy petition and seek approval of the plan.[2]

The plan represented by far J&J's most generous offer to resolve the talc litigation. Initially, it provided that talc claimants would recover approximately $8 billion dollars over 25

[1] J&J Press Release (May 1, 2024), https://www.jnj.com/media-center/press-releases/johnson-johnson-announces-plan-by-its-subsidiary-llt-management-llc-to-resolve-all-current-and-future-ovarian-cancer-talc-claims-through-a-consensual-prepackaged-reorganization.

[2] *See* LLT Press Release at 2 (June 10, 2024), https://document.epiq11.com/document/getdocumentbycode/?docId=4341383&projectCode=RRI.

years, a present value of $6.475 billion.[3] J&J later increased the value of the plan by $1.1 billion and accelerated the timing of payments.

To achieve confirmation of a "prepackaged" plan, J&J solicited votes in compliance with the Bankruptcy Code. *See* 11 U.S.C. §§ 1125, 1126. To this end, J&J prepared a detailed disclosure statement, which its solicitation agent sent to claimants' counsel, along with voting ballots. As the materials made clear, a lawyer representing a talc claimant could vote for or against the plan only after the client had (i) provided his or her informed consent to the vote, or (ii) granted the lawyer power of attorney to vote on the client's behalf. *See* Ex. A at 3 (Beasley Allen Master Ballot).

Because Beasley Allen represents multiple talc claimants, it received a Master Ballot on which to record its clients' votes. *See id*. (Beasley Allen Master Ballot). Consistent with Beasley Allen's staunch opposition to resolving this litigation through bankruptcy, its ballot represented that the majority of its clients voted against the plan. *See id*. at 4; Ex. B (Beasley Allen Master Ballot Spreadsheet). In casting those votes, Mr. Birchfield certified under penalty of perjury that he "obtained authority to procedurally cast such Client's vote," and that "[e]ach such Client has indicated his or her informed consent with respect to such vote." Ex. A at 3-4, 7 (Beasley Allen Master Ballot). That certification was false.

Twenty-one plaintiffs voted for the plan through their "counsel of choice," Jim Onder of OnderLaw, and certified that Beasley Allen falsely cast ballots against the plan on their behalf and without their consent. *See* Ex. C. These claimants further explained that they "never directed Beasley Allen to cast a ballot on [their] behalf against the Plan," and that "the vote cast by Beasley

[3] *See id.* at 1; Red River Press Release at 1, https://document.epiq11.com/document/getdocumentbycode/?docId=4343603&projectCode=RRI (last visited May 27, 2025).

Allen without [their] consent does not reflect [their] wishes." *Id*. In other words, Beasley Allen purported to vote claims without claimant consent and against their wishes.[4]

The bankruptcy court's findings confirmed that Beasley Allen's certification that it had "informed consent" to vote against the plan on behalf of all claimants listed on its master ballot was not accurate. As the bankruptcy court explained, Mr. Birchfield "certified each of his 11,000 votes under Option A" (the "informed consent" option), "[b]ut the evidence confirmed that he received only 3,000 affirmative responses from clients communicating how the client wanted to vote. The firm did not receive a response from the remaining 8,000." *Red River* at 33; *see also* Ex. D, Excerpt from Mr. Birchfield's Testimony in Bankruptcy Proceeding, 1433:9-12, 1436:23-25, Feb. 21, 2025. Mr. Birchfield testified in the bankruptcy hearing that he believed a non-response from claimants was the same as informed consent—i.e., that he "collected their silence as a response." *Id*. at 1441:2-23. But the bankruptcy court rejected that, saying "silence" does not "equal[] acceptance based on the required certification language." *Red River* at 34. The bankruptcy court proceeding revealed that Beasley Allen's certifications were inaccurate as to thousands of additional claimants.

Beasley Allen also admitted to knowingly prejudicing its own clients' interests. As the bankruptcy court pointedly noted, Mr. "Birchfield also certified that over 5,000 voting clients had gynecological cancer on his Master Ballot Spreadsheet.[] And thousands of these clients were voted to reject the [bankruptcy plan] without any direction from those clients." *Red River* at 34; *see also* Ex. D at 1419:20-1420:11, 1445:20-1447:6. This was a problem because Mr. Birchfield

[4] The Smith Law Firm sued the Beasley Allen firm, alleging interference with the Smith Law Firm's ability to communicate its support for the plan to its clients. *See* Compl. ¶¶ 55, 59, *The Smith Law Firm, PLLC v. Andy Birchfield Jr.*, No. 3:24-cv-00564-CWR-ASH (S.D. Miss. Sept. 19, 2024). To be sure, Beasley Allen has also sued the Smith Firm. *See Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. v. The Smith Law Firm, PLLC*, No. 2:24-cv-00582-JTA (M.D. Ala. filed Sept. 10, 2024).

testified that he believes "gynecological [cancer] claims would be non-compensable in the tort system," *id*. at 1420:14-16, based on a lack of a scientific, "causal link" between those cancers and talc use, *id*. at 1428:16-19; *see also id*. at 1494:18-20 ("I do not believe that the science would support prosecution of [gynecological cancer] claims in the tort system."). As the bankruptcy court recognized, Mr. "Birchfield voted on behalf of clients, without their consent, to reject payment under the [plan] even though he believes those clients will not and cannot be paid in the tort system." *Red River* at 34. In other words, Beasley Allen shot down their own clients' only chance of recovery—and he did so without their consent. *See also* Ex. E, Excerpt from Mr. Birchfield's Testimony in Bankruptcy Proceeding, 1371:23-1372:5, 1374:10-19, 1376:13-24, Feb. 20, 2025 (Mr. Birchfield repeatedly confirming Beasley Allen's position that it "would never ever negotiate with J&J in bankruptcy").

Against this backdrop, Beasley Allen would make significant sums through common benefit fees if the claims were resolved through litigation. *See, e.g.*, Ex. F, MDL Case Management Order 7(A); Ex. G, MDL Dkt. 32149 (May 3, 2024 Tr. 53:10-55:10); Ex. H, MDL Dkt. 28760-6 (Birchfield Dep. at 28:9-11). By contrast, as Mr. Birchfield acknowledged, Beasley Allen would not have been entitled to common benefit fees under J&J's announced bankruptcy plans. *See* Ex. G, MDL Dkt. 32149 (May 3, 2025 Tr. 53:18-20); *see also* Ex. H, MDL Dkt. 28760-6 (Birchfield Dep. at 18:8-25, 20:24-22:19). Beasley Allen has thus fought J&J's bankruptcy efforts at every stage, effectively denying recovery to thousands of claimants who support resolution in bankruptcy.

Less than two weeks after dislodging a global resolution in bankruptcy by submitting an inaccurate certification that was against client interests, Mr. Birchfield directly solicited Johnson & Johnson's General Counsel to engage in global settlement negotiations with him and Ms.

O'Dell—but now in a forum outside bankruptcy. *See* Ex. I. As is evident from its response to his solicitation, *see* Ex. J, Johnson & Johnson could not engage with Beasley Allen on any issue in view the actions taken in the bankruptcy proceeding. Shortly after, Beasley Allen sent another letter to Defendants requesting common benefit fund fees. Ex. K, May 1, 2025 Letter.

B. Counsels' Collaboration with a Former J&J Attorney Demonstrates Conduct Detrimental to the Prompt, Fair and Efficient Administration of Justice and Undermines J&J's Legitimate Interests.

In June 2020, James Conlan joined the law firm Faegre Drinker Biddle & Reath as a partner in its finance and restructuring practice.[5] At that time, Faegre Drinker was J&J's lead counsel in *In Re Johnson & Johnson Talcum Powder Litigation*, No. 3:16-md-02738 (D.N.J.). Within a month, Mr. Conlan began representing J&J as part of a team evaluating legal strategies for resolution of pending and future claims by plaintiffs asserting liability for illnesses allegedly caused by talc products. Ex. L, Declaration of E. Haas ("Haas Decl.") ¶ 4. J&J retained Mr. Conlan to join that team based on his representations that he was the "premier expert" on restructuring mass tort liabilities. Ex. M, Hearing Transcript at 33:4-35:3, 122:8-20, *In Re: Johnson and Johnson Talcum-Based Powder Products Litigation*, No. ATL-L-2648-15 (N.J. Sup. Ct. Law Div. Mar. 25, 2024). Mr. Conlan touted himself as having "more knowledge in this area … than anyone else on the planet." *Id.* at 33:4-9. Over the next 20 months, Mr. Conlan spent almost 1,600 hours on the matter and billed J&J $2.24 million for his time. Ex. L ¶ *5.* This included 1,154 hours in 2021 alone – an average of four and a half hours every workday. *Id.*

Mr. Conlan's work as counsel for J&J touched every strategic option the company considered for resolution of talc claims, including resolution in the tort system, a resolution

[5] *See* Newly Merged Faegre Drinker Scoops Up Leading Sidley Restructuring Partners in US, London (June 1, 2020), available at https://www.law.com/americanlawyer/2020/06/01/newly-merged-faegre-drinker-scoops-up-leading-sidley-restructuring-partners-in-us-london/?slreturn=20250522153516 (last accessed May 22, 2025).

through the Imerys bankruptcy, or proceeding via an internal bankruptcy. When working on the Imerys bankruptcy, Mr. Conlan participated in discussions with J&J's top in-house legal executives regarding options for structuring claim values, proposed settlement matrices, and other factors driving J&J's decision-making. Ex. M at 34:15-35:25; Ex. N, Plenary Hearing Transcript at 15:16-16:4, 18:11-25, 20:3-17, 41:2-14, 44:20-47:2, 48:2-22, 53:22-54:13, 54:14-55:18, 60:19-21, 65:5-66:2, 67:8-19, 68:19-69:6, 77:15-23, 80:6-13, *In Re: Johnson and Johnson Talcum-Based Powder Products Litigation*, No. ATL-L-2648-15 (N.J. Sup. Ct. Law Div. Apr. 10, 2024). In fact, Mr. Conlan was so closely involved in resolution of the Imerys bankruptcy that he skied with the future claimants' representative. Ex. N at 86:10–87:1.

Mr. Conlan's engagement also included advising J&J regarding the potential resolution of talc claims through a bankruptcy filing by LTL, effectuated on October 14, 2021. J&J established LTL as a new subsidiary that would be responsible for holding and managing North American legal claims related to the company's cosmetic talc. In 2021, in the run-up to LTL's bankruptcy filing, Mr. Conlan was "intimately involved" in "all the discussions regarding the potential for bringing a bankruptcy in which [J&J] was the debtor." Ex. M at 40:3-20. He attended dozens of meetings and participated in innumerable phone conferences with J&J's Worldwide Vice President for Litigation, Erik Haas; former head of litigation, Joseph Braunreuther; and other counsel working for J&J on the talc litigation. Ex. L ¶ 6. Those conferences also included J&J's former product liability lead John Kim, who became LTL's Chief Legal Officer upon its formation, and J&J's current product liability head, Andrew White. *Id.* Mr. Conlan also communicated regularly with those team members via email and participated in and was privy to myriad communications with J&J's other outside counsel. *Id.* ¶ 7. All told, as a fully integrated member of the legal team evaluating J&J's options for resolution of talc liabilities, Mr. Conlan participated in analysis and

discussion of the company's objectives with in-house and outside counsel for more than a year and a half, worked on the talc matter almost daily, and engaged in countless confidential, attorney-client communications. In fact, Mr. Conlan himself agreed that the record is "crystal clear" he had confidential discussions. Ex. N at 8:10-17.

The content of these confidential discussions concerned precisely the kind of information Mr. Conlan could leverage against J&J. Mr. Conlan learned J&J's strategic thinking about how to resolve its biggest liability, be it "in the tort system … through litigation," the "bankruptcy system," divisional merger followed by a spin-off or bankruptcy, or structural optimization. Ex. M, 15:21-16:21. This included, most importantly, the amount J&J "would be willing to pay to resolve [the talc] claims, both on an aggregate basis and a per claim basis," which could be funneled into "what is called [a] settlement matrix." *Id.* at 27:23-28:12. Not only did Mr. Conlan learn how J&J valued *current* claims, but also "the potential value of *future* claims," "[b]oth at an aggregate level and per claim level and the criteria that go into how [J&J] set [its] per claim amounts." *Id.* at 17:5-13 (emphasis added).

Mr. Conlan left Faegre Drinker in 2022 to launch a business called Legacy Liability Solutions LLC ("Legacy"), where he serves as Chief Executive Officer. Even after this move, Mr. Conlan still owes the duties that all attorneys owe to former clients. *See* ABA Model Rule 1.9. However, Mr. Conlan pitched his new business directly to J&J in August 2022, *See* Ex. L, Haas Decl. ¶ 9, Ex. 1 (August 23, 2022 email), and thereafter repeatedly sought to convince J&J that Legacy should acquire and manage LTL or affiliated entities holding liability for present and future talc claims – but only after J&J funded the entities with what Legacy felt would be sufficient capital to cover the potential liabilities. *Id.* at ¶ 14, Ex. 6 (Nov. 9, 2023 Conlan Letter to J&J Board). Mr. Conlan proposed that Legacy would then invest and administer that money to settle

talc claims within the tort system, to Legacy's financial benefit. *Id.* After J&J made clear that it would not be accept Mr. Conlan's proposal, he partnered with the Beasley Allen law firm.

During a public earnings call on October 17, 2023, J&J reiterated its intention to pursue resolution of its talc claims through the bankruptcy process. The next day, Mr. Conlan emailed J&J Treasurer Duane Van Arsdale and revealed that "Legacy has the support of lead counsel for the [ovarian cancer] claimants (including Andy Birchfield) for an MDL opt-in settlement matrix with Legacy." *Id.* ¶ 11, Ex. 3 (Oct. 18, 2023 Conlan email to Van Arsdale). Mr. Conlan told Mr. Van Arsdale that "[t]he establishment of a settlement matrix should greatly reduce the uncertainty surrounding the estimation of future claims and the associated challenges of determining the quantum of funding necessary for your auditors to remove the non-cash charge for J&J's current and future talc related liabilities." In other words, unbeknownst to J&J, Mr. Conlan had been actively discussing a resolution of J&J's talc liabilities with Beasley Allen attorneys, and that proposed resolution sought to have J&J fund potential liabilities based on a matrix Mr. Conlan and Mr. Birchfield had jointly developed. That settlement matrix was the basis for what Mr. Conlan ultimately revealed as the amount he would require for his Legacy proposal: a minimum of $19 billion, or more than $10 billion above what the majority of current talc plaintiffs had agreed was a fair resolution.

Mr. Conlan then authored an opinion piece in Bloomberg entitled, "Time to Ditch the Texas Two-Step for a New Mass Tort Strategy" on November 2, 2023. This article argued that J&J's efforts to use the bankruptcy process to provide a fair and efficient resolution of talc claims was a "spectacular" failure that had "polluted the dialogue about the legitimate interest of a public company in obtaining 'finality' with respect to both current and future claims, and plaintiffs'

legitimate interest to have their claims determined or settled in the tort system and paid in full."[6] Mr. Conlan insisted that "[s]tructural optimization and disaffiliation of the liable entities" – exactly what he was pitching to J&J – was "the right answer for everyone." *Id.* Mr. Birchfield issued a press release the same day, which was also published by Bloomberg, stating his opinion that "[p]laintiffs' lawyers in talc-related ovarian cancer cases share Mr. Conlan's concerns that the Texas Two-Step has 'polluted' the narrative."[7] He went on to state that Mr. Conlan's proposal "should be appealing," because plaintiffs' lawyers "share [Mr. Conlan's] vision of a win-win solution where claimants can pursue their claims in the tort system." *Id.*

Mr. Conlan wrote to J&J seven days later to attach the $19 billion price tag to the "settlement matrix" he had developed with Beasley Allen's support. Ex. L, Haas Decl., ¶ 14, Ex. 6 (Nov. 9, 2023 Conlan Letter to J&J Board). In the letter, Mr. Conlan told J&J that "Leading Counsel in the MDL have agree to support an opt-in settlement with Legacy, post-acquisition, on the terms described in the accompanying matrix." *Id.* at 2. Mr. Conlan continued, "Leading Counsel in the MDL believe the matrix settlement will enjoy 95% opt-in," *id.*, a fact that could only be known from Mr. Conlan's communications with his former adversary Mr. Birchfield.

Just six days later, J&J learned that Gordon Haskett Research Advisors would host a symposium in New York on "JNJ: Talc Litigation & 3rd Bankruptcy" on November 29, 2023. *Id.* ¶ 16. The symposium was to feature "two experts"—James Conlan and Andy Birchfield—to discuss the "viability" of "J&J's potential 3rd bankruptcy," "potential settlement issues," and "how J&J could resolve the litigation outside of bankruptcy," *id.*, the outcome they have jointly pursued.

[6] https://news.bloomberglaw.com/us-law-week/time-to-ditch-the-texas-two-step-for-a-new-mass-tort-strategy-1.

[7] https://www.bloomberg.com/press-releases/2023-11-02/key-lawyer-in-johnson-johnson-talc-litigation-supports-call-to-rethink-legal-strategies-in-light-of-failure-of-texas-two-step.

ARGUMENT

New Jersey Court Rules govern the *pro hac vice* admissions of attorneys from other jurisdictions. *See* Rule 1:21-2. Although such admissions are leniently granted, "[a] motion for *pro hac vice* admission is committed to the sound ***discretion*** of the court." *See Matter of Est. of Jones*, No. A-2557-16T2, 2018 WL 4471686, at *8 (N.J. Super. Ct. App. Div. Sept. 19, 2018) (emphasis added). Accordingly, New Jersey courts retain broad discretion to deny *pro hac vice* applications when circumstances warrant. *See, e.g.*, *State v. Chappee*, 211 N.J. Super. 321, 335, 511 A.2d 1197, 1205 (App. Div. 1986) (affirming denial of *pro hac vice* admission and holding that the trial court did not abuse its discretion).

This is such a case. Given the myriad of ethical issues in the coordinated talc litigation outlined above, the Court should exercise that discretion to deny the *pro hac vice* applications of Ms. O'Dell and Mr. Birchfield. Their admission would be detrimental to the prompt, fair and efficient administration of justice, as well as the interests of J&J.

As the bankruptcy court found, Mr. Birchfield's certification that he had informed consent to vote against J&J's proposed bankruptcy plan on behalf of over 11,000 clients was not accurate, as he had received affirmative voting directions from only 3,000. In addition, as twenty-one talc claimants certified, votes cast by Beasley Allen on their behalf in the talc bankruptcy were "without [their] consent" and did "not reflect [their] wishes." *See* Ex. C (Claimant Declarations). Mr. Birchfield also knowingly voted without consent for thousands more (including many with gynecological cancer, whose claims he admitted were likely non-compensable in the tort system), thus depriving his own clients of a viable chance at recovery. These actions demonstrate a disregard for client obligations, client autonomy, and the integrity of the judicial process. .

Courts in New Jersey have denied *pro hac vice* admission under similar circumstances. *See Kohlmayer v. Nat'l R.R. Passenger Corp.*, 124 F. Supp. 2d 877, 883 (D.N.J. 2000) (affirming denial of *pro hac vice* admission and noting that "Courts can use their discretion to deny the privilege of *pro hac vice* admission to attorneys who consistently act in an uncivilized manner, regardless of whether formal ethical complaints have been made against the *pro hac vice* applicant."). The serial ethical lapses by Ms. O'Dell and Mr. Birchfield throughout the coordinated talc litigation warrant the denial of their *pro hac vice* applications.

The *pro hac vice* applications should also be denied due to Ms. O'Dell's and Mr. Birchfield's collaboration with James Conlan, a former attorney for J&J who was deeply involved in the company's confidential legal strategy regarding talc litigation and bankruptcy, as explained above. Their alliance, which included public endorsements, coordinated messaging, and joint appearances at industry events, directly undermines the integrity of the adversarial process and reflects violations of professional conduct standards. This demonstrates conduct unbecoming of counsel admitted before this Court and would be "detrimental" to J&J in the fair adjudication of the instant dispute.

CONCLUSION

For the foregoing reasons, Plaintiffs' motion for the *pro hac vice* admission of P. Leigh O'Dell and Andy Birchfield should be denied.

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Respectfully submitted,

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