

DOCKET NO: FBT-CV24-6132946-S : SUPERIOR COURT  
LAURA SMITH : J.D. OF FAIRFIELD  
VS. : AT BRIDGEPORT  
COOPERSURGICAL, INC., ET AL : MAY 9, 2024

**MOTION TO DISMISS**

The defendants, **Utah Medical Products, Inc. ("UTMD")**, **Cooper Companies, Inc. ("TCC")**, and **Femcare Ltd.-UK ("Femcare")** (collectively, "Defendants" or "Movants"), hereby move to dismiss the Plaintiff's Complaint for lack of personal jurisdiction over the moving Defendants.

In brief, because the moving Defendants are all foreign corporations with no presence whatsoever in Connecticut, and because the Plaintiff is neither a Connecticut resident nor has she pleaded that she regularly does business in Connecticut, Connecticut's corporate long-arm statute, Conn. Gen. Stat. §33-929(f), does not confer jurisdiction over the Movants. In addition, any exercise of jurisdiction over these Defendants would violate Constitutional principles of Due Process. Finally, Plaintiff has not complied with service and filing requirements with respect to Femcare, and it should be dismissed, *inter alia*, under Conn. Gen. Stat. § 52-46 § 52-46a. For these reasons, then, this Court may not exercise jurisdiction over the moving Defendants, and the action against them should be dismissed.

In support, the Defendants submit herewith a Memorandum of Law in Support of Motion to Dismiss, along with supporting exhibits.

WHEREFORE, for the reasons set forth in the Memorandum of Law, the Defendants respectfully move the court to dismiss the Plaintiff's Complaint against them.

THE DEFENDANTS,  
COOPER COMPANIES, INC., FEMCARE,  
LTD.-UK, and UTAH MEDICAL PRODUCTS,  
INC.

By /s/ 402182

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## CERTIFICATION

I hereby certify that a copy of the above was mailed or electronically delivered on this 9<sup>th</sup> day of May 2024 to all counsel and pro se parties of record and that written consent for electronic delivery was received from all counsel and pro se parties of record who were electronically served.

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