

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

**IN RE: ALLERGAN BIOCELL
TEXTURED BREAST IMPLANT
PRODUCTS LIABILITY LITIGATION**

This Document Relates to All Actions.

**MDL NO. 2921
Case No.: 2:19-md-02921**

**JUDGE BRIAN R. MARTINOTTI
JUDGE JOSEPH A. DICKSON**

**CASE MANAGEMENT ORDER # 17
(Consolidated Class Action Complaint; Master Long Form Complaint For Personal
Injuries and Short-Form Adoptions Thereof)**

The Court finds that the Parties have conferred regarding a Case Management Order addressing Plaintiffs' Consolidated Class Action Complaint [ECF No. 118] ("Consolidated Class Complaint") and Master Long Form Complaint For Personal Injuries And Demand For Jury Trial [ECF No. 119] ("Master Personal Injury Complaint") to be utilized in MDL 2921. The Parties having stipulated thereto, it is **ORDERED** as follows:

I. GENERAL PROVISIONS

A. Scope of Order. This Order shall apply to all cases currently pending in MDL 2921 and to all related actions that have been or will in the future be originally filed in, transferred to, or removed to MDL 2921. This Order is binding on all parties and their counsel in all such cases.

B. Purpose of Order. In light of the number of complaints filed to date and likely to be filed in the future in MDL 2921, the Parties have agreed to the following procedures. This Order is not intended to alter the applicable provisions of the Federal Rules of Civil Procedure or

the Local Rules of this Court, except as otherwise provided herein or in any subsequent Case Management Order.

II. CONSOLIDATED CLASS ACTION COMPLAINT

The Consolidated Class Complaint is deemed filed as of May 26, 2020 and shall supersede and amend any putative class action complaint previously filed in or transferred to MDL 2921. The putative class action cases listed in Exhibit A are administratively terminated as of the date of this Order.

III. MASTER PERSONAL INJURY COMPLAINT AND MASTER SHORT FORM COMPLAINT

A. The Master Personal Injury Complaint is deemed filed as of May 26, 2020 and shall be deemed pleaded in the cases listed in Exhibit B.

B. The Court hereby **APPROVES** the Master Short Form Complaint attached to this Order as Exhibit C.

C. Every personal injury plaintiff with a pending action in MDL 2921 as of the entry of this Order and listed in Exhibit B shall, on his or her individual existing docket, re-file their respective actions utilizing the Master Short Form Complaint within sixty (60) days of the entry of this Order. Any individual complaint re-filed via a Short Form Complaint within the time provided in this section will be deemed to have been filed on, and relate back to, the original filing date.

D. All personal injury actions that are direct-filed in this district and associated with MDL 2921 pursuant to Amended CMO 6 [ECF No. 181] after the date of this Order shall be filed utilizing the Master Short Form Complaint attached as Exhibit C.

E. All actions that are transferred or removed to MDL 2921 before and/or after entry of this Order shall utilize the Master Short Form Complaint, attached as Exhibit C, and those plaintiffs shall refile their respective cases within sixty (60) days of their case being docketed in MDL 2921.

F. All actions that were previously filed prior to the entry of this Order and those transferred or removed to MDL 2921 before and/or after entry of this Order, shall refer to their individual docket number upon the filing of their Short Form complaint to avoid the triggering of a filing fee. Nothing in this CMO or the filing of a short form complaint shall be construed as a prior dismissal or amendment of a prior complaint.

G. Pursuant to the Court's August 13, 2020 Letter Order [ECF No. 178], all plaintiffs filing Short Form complaints must use their full names and are prohibited from identifying themselves by their initials or other pseudonyms.

H. All direct-filed cases after the entry of this Order shall pay the filing fee upon filing of the Short Form Complaint (see Section IV below).

IV. ADDITIONAL PROVISIONS REGARDING MASTER PERSONAL INJURY COMPLAINT AND MASTER SHORT FORM COMPLAINT

A. It is the duty of the counsel representing any plaintiff(s) pursuing claims in MDL 2921 to ensure that the Short Form Complaint(s) is completed properly, including any additional causes of action pleaded thereto.

B. All Short Form Complaints must be filed electronically, absent extraordinary circumstances. **Prior to any attorney filing a Short Form Complaint directly in this district for MDL 2921, that attorney must register for, and obtain, a District Court for the District**

**of New Jersey's Electronic Filing Policies and Procedures Manual found at:
<https://www.njd.uscourts.gov/sites/njd/files/PoliciesandProcedures2014.pdf>.**

C. Except as set forth above, filing fees and payments shall be required for all complaints and made online through Pay.gov. Except as set forth above, any plaintiff filing a Short Form Complaint will be prompted to pay the required filing fee. Information regarding filing fees can be found in the Electronic Case Filing Procedures Guide:

<https://www.njd.uscourts.gov/sites/njd/files/PoliciesandProcedures2014.pdf>.

D. Pursuant to Amended CMO 7 [ECF No. 102], service of a Short Form Complaint may be effectuated on defendants Allergan, Inc. and Allergan USA Inc., only, by sending an ECF-conformed or stamped copy of the Short Form Complaint to MDL2921Pleading@reedsmith.com. Sending an email to this address containing the ECF-conformed or stamped copy of the Short Form Complaint will constitute good, valid, and official service for these actions under Fed. R. Civ. P. 4 as to Allergan, Inc. and Allergan USA Inc. only. Actions shall be considered served on the date and time of the transmittal of the email containing the aforementioned items. All counsel are directed to refer to Amended CMO 7 for the full details regarding timing and procedure for service. By waiving service of process and accepting complaints by email, Allergan, Inc. and Allergan USA Inc. are not waiving any affirmative defenses, but these defendants shall not challenge the adequacy of service if properly made pursuant Amended CMO 7.

E. Nothing in this Case Management Order changes the respective roles and duties of Plaintiffs' Co-Lead Counsel or the Plaintiffs' Steering Committee, and the counsel for the individual plaintiffs. Nothing in this CMO confers on Plaintiffs' Co-Lead Counsel or the PSC an attorney client relationship with any individual plaintiff who utilizes the Short Form Complaint

and as such, nothing in this CMO prevents counsel representing any individual plaintiff from including additional causes of action.

V. SEVERANCE OF MULTI-PLAINTIFF COMPLAINTS

A. From the date of this Order, no multi-plaintiff Short Form Complaints may be directly filed in this district for MDL 2921. The clerk's office is instructed to reject for filing any multi-plaintiff complaint, except those naming a derivative plaintiff (e.g., cases in which a spouse is asserting a loss of consortium claim or there is some other derivative claim(s) file based upon the same underlying injury to the recipient of the subject medical device).

B. For the multi-plaintiff complaints currently pending in MDL 2921, identified in the attached Exhibit D, the Court will issue a "Severance Order" that will sever the individual plaintiffs listed, but for the first named plaintiff (and derivative plaintiff, if applicable) in the Plaintiff Specific Allegations contained in the complaint. Within sixty (60) days of the issuance of such a Severance Order, the severed plaintiffs shall file separate individual Short Form Complaints pursuant to this Order, attaching the Severance Order as an Attachment to the filing. Individual civil action numbers will then be assigned for each individual case. Any individual Short Form Complaint filed within the time provided will be deemed to have been filed on and relate back to the original filing date of the applicable multi-plaintiff action. Any statute of limitations defense that existed as of the filing dates of the original multi-plaintiff complaints shall be preserved.

C. Counsel for Defendants are directed to notify the Court of any multi-plaintiff complaints that are transferred or removed to MDL 2921 following entry of this Order, and the Court will issue a similar "Severance Order" directing any affected to follow the procedures set forth in Section V, Paragraph B above.

VI. TRANSFEROR COURT

A. The District of New Jersey shall not be deemed the “transferor court” simply by virtue of the action having been filed into MDL 2921. The direct filing of actions that would otherwise have been filed in other Districts, in MDL 2921 in the District of New Jersey, is solely for the purposes of consolidated discovery and related pretrial proceedings as provided by 28 U.S.C. § 1407, and the parties submit to this Court’s personal jurisdiction and venue in the District of New Jersey for those purposes only.

B. Upon completion of all pretrial proceedings applicable to a case directly filed in the District of New Jersey, the parties may, but are not required to, waive their rights to transfer any case in MDL 2921 to a court of proper venue under 28 U.S.C. § 1406(a).

C. At the conclusion of all pretrial proceedings, the Court, pursuant to 28 U.S.C. § 1404(a), will transfer each such case directly filed in the District of New Jersey to a federal district court of proper venue as defined in 28 U.S.C. § 1391, based on the recommendations of the parties to that case, or on its own determination after briefing from the parties if they cannot agree, unless the parties agree to trial of the case in the District of New Jersey.

D. In an effort to avoid serial objections to venue in a single action, the plaintiff shall identify in response to a defendant’s venue objection, proposed alternative venues in order of preference, so that the Court can consider at the same time, any objections to the plaintiff’s alternative choices. This provision has no impact on cases filed in the District of New Jersey without reference to the direct filing order, based on a plaintiff’s selection of the District of New Jersey as the preferred venue for the action.

VII. MANDATORY COMPLIANCE WITH THIS CMO

Any plaintiff who fails to timely comply with this Order will be subject to involuntary dismissal by the Court pursuant to Rule 41(b) of the Federal Rules of Civil Procedure. The parties shall meet and confer prior to defendants requesting an Order to Show Cause on any Plaintiff's failure to comply with this CMO.

IT IS HEREBY ORDERED:

DATED: September 15, 2020



HON. BRIAN R. MARTINOTTI
UNITED STATES DISTRICT JUDGE

EXHIBIT A

List of Putative Class Action Cases To Be Administratively Terminated

Plaintiff[s]	Case No.
A.B., et al.	2:19-cv-21600
Alabama Doe, et al.	2:19-cv-21635
Noelle Belmonte, aka Noelle McDonnel, et al.	2:19-cv-16679
C.C., et al.	2:20-cv-00027
Lisa Kosto, et al.	2:20-cv-00223
Jane Doe 1, et al.	2:19-cv-21632
Jane Doe, et al.	2:20-cv-00282
F.A., et al.	2:20-cv-01760
F.W., et al.	2:20-cv-00015
Jessica Valdez, et al.	2:20-cv-00034
Ellen Newman, et al.	2:20-cv-01972
Kelli Russell, et al.	2:19-cv-22116
Angela Sloan, et al.	2:19-cv-22124
Dana Zettlemyer, et al.	2:19-cv-21776
Nancy LaFleur, et al.	2:20-cv-08517
Valerie R., et al.	2:20-cv-02099

EXHIBIT B

List of All Cases Currently Pending In MDL 2921

Plaintiff	Case No.	Multi-Plaintiff
Byrnes, Maureen	2:19-cv-22195	
Crawford, Theresa Ann	2:19-cv-22144	
Haddad, Tammy	2:19-cv-22143	
Saade, Wendy Ann	2:20-cv-12446	
Lester, Amy	2:19-cv-22142	
Riiber, Danielle	2:20-cv-12517	
Riortella, Misty	2:19-cv-22145	
Abbot, Miranda	2:20-cv-09734	
Adcock, Amber	2:20-cv-08584	
Aguilar, Carmen	2:20-cv-11527	
Alexander, Sharlene	2:20-cv-08901	
Alghetta, Michele	2:20-cv-09453	
Alvarez, Dona	2:20-cv-09070	
Ameen, Kelly	2:20-cv-08663	
Anderson, Angela	2:20-cv-09000	
Andrus, Rachel	2:20-cv-09220	
Arnold, Mary Lee	2:20-cv-09382	
Ashcraft, Lisa	2:20-cv-00019	
Atchley, Stacey	2:20-cv-03624	

Plaintiff	Case No.	Multi-Plaintiff
Athens, Elizabeth P.	2:20-cv-10215	
Aucoin, Andrea	2:20-cv-08896	
Austin, Wanda	2:20-cv-09123	
Badeaux, Vivian M.	2:20-cv-09514	
Barnes, Danielle	2:20-cv-08606	
Baron, Dawn	2:20-cv-09317	
Barrett, Jillian	2:20-cv-09456	
Bartholomew, Karen	2:20-cv-09371	
Bates, Jennifer	2:20-cv-11490	
Beckcom, Sarah	2:20-cv-06993	
Benoit, Christine Annette	2:20-cv-10218	
Bergeron, Carey	2:20-cv-09121	
Bergschneider, Gloria	2:20-cv-11915	
Blackmon, Melani	2:20-cv-10652	
Bobak, June	2:20-cv-05917	
Bock, Melody	2:20-cv-09006	
Borne, Sharon	2:20-cv-08065	
Boudreaux, Heather Marie	2:20-cv-09384	
Branch, Kristen	2:20-cv-09240	
Brown, Dana	2:20-cv-08617	

Plaintiff	Case No.	Multi-Plaintiff
Brown, Sandra	2:20-cv-08084	
Brown, Tiffany	2:20-cv-08706	
Buffa, Rachael Marie	2:20-cv-07063	
Burnside, Carol	2:20-cv-03782	
Cain, Julia	2:20-cv-09507	
Campbell, Edith; Jane Doe 1; Davis, Tabitha; Douglas, Jennifer; Earl, Debra; Jane Doe 2; Kendra Fugate; Hunt-Carden, Kristin; Maddox, Melissa; Mathis, Gigi; Orgeron, Tammy; Serigne, Sabrina; St. Romain, Paige; Thompson, Aletha; Thompson, Joanie; Thurman, Tammy; Tuoheym Donna; Walker, Patricia; Whitcomb, Lisa	2:20-cv-09956	Y
Capetta, Desiree	2:20-cv-08644	
Carpino, Terrie	2:20-cv-09481	
Catchot, Tina	2:20-cv-09510	
Chetta, Debra	2:20-cv-08637	
Choonyup Wei, Insun Cho, Eunjin Lee, Yunjae Shin, Seoyun Hwang, Yunjung Lee, Jioh Kim, Haejung Cho, Misoon Chang, Heean Sohn, Yunjin Bae, Sunmi Choi, Myunghwa Lee, Soohkee Moon, Jungyun Lee, Mihwa Kwak, Yunmee Kang, Sujin Park, Seungshin Kim, Daborah Park, Kangsoon Jung, Eunkyung Kil, Jungbin Kim, Sunkyung Kim, Eunju Lee	2:20-cv-04288	Y

Plaintiff	Case No.	Multi-Plaintiff
Chouest, Ashley	2:20-cv-08204	
Clark, Jill	2:20-cv-09125	
Cody, Tanya	2:20-cv-07998	
Coffman, Kimberly Ann	2:20-cv-09385	
Cook, Kacia	2:20-cv-09219	
Cook, Mary Caroline	2:20-cv-09428	
Cook, Robin	2:20-cv-09401	
Corass, Naomi	2:20-cv-08684	
Cortez, Melissa	2:20-cv-08905	
Courville, Tessie	2:20-cv-12055	
Cranson, Melva	2:20-cv-10832	
Creeden, Rita Ann (deceased)	2:20-cv-03246	
Crespo, Kim	2:20-cv-06326	
Dave, Kapatheual	2:20-cv-08902	
Delery, Rachel	2:20-cv-08959	
Delgaudio, Leslie	2:20-cv-09598	
Dill, Asley	2:20-cv-09080	
Douglas, Jennifer	2:20-cv-09508	
Downey, Christine	2:20-cv-11349	
Edwards, Deborah	2:20-cv-09218	

Plaintiff	Case No.	Multi-Plaintiff
Estrada, Vanessa	2:20-cv-09980	
Falgout, Bonnie	2:20-cv-01834	
Felder, Mary	2:20-cv-08680	
Felker, Sylvia	2:20-cv-07984	
Fitak, Brenda	2:20-cv-09074	
Ford, Maria	2:20-cv-07929	
Forney, Michelle	2:20-cv-04987	
Foster, Donna	2:20-cv-08123	
Frick, Judith	2:20-cv-09273	
Froling, Erika Hazell	2:20-cv-06789	
Fuller, Sarah Rene	2:20-cv-08946	
Galjour, Caitlyn	2:20-cv-09217	
Gay, Lauren	2:20-cv-08707	
Gentry, Amanda	2:20-cv-09140	
Ginder, Tania	2:20-cv-01672	
Gonlag, Louise	2:20-cv-08679	
Gonzales, Alicia M.	2:20-cv-10653	
Goodale, Kimberly Ann	2:20-cv-10209	
Graham, Mahria	2:20-cv-09294	
Greene, Jessica	2:20-cv-03524	

Plaintiff	Case No.	Multi-Plaintiff
Grier, Deanna	2:20-cv-08943	
Grimes, Chanda D.	2:20-cv-11495	
Gugliuzza, Leslie	2:20-cv-09107	
Guillot, Cynthia	2:20-cv-09424	
Gutierrez, Tamara	2:20-cv-05416	
Haley, Julienne	2:20-cv-08904	
Hall, Felicia	2:20-cv-09213	
Hall, Rikki	2:20-cv-10221	
Hampton, Karen	2:20-cv-03784	
Hannah, Jennifer	2:20cv11344	
Harris, Kakeisha	2:20-cv-08660	
Hartfield, Jaime	2:20-cv-09245	
Hartman, Jamie	2:20-cv-08648	
Hasselbrink, Catrina	2:20-cv-09210	
Heagy, Jessica	2:20-cv-05414	
Hearne, Linda	2:20-cv-06000	
Hegwood, Robbie	2:20-cv-09337	
Hernandez-Patton, Melissa Renee	2:20-cv-09386	
Higgins, Kristen	2:20-cv-10214	

Plaintiff	Case No.	Multi-Plaintiff
Higham, Katherine	2:20-cv-09532	
Hitzman, Sherry	2:20-cv-09111	
Hobgood, Mary	2:20-cv-05154	
Holland, Jodi	2:20-cv-09504	
Horner, Kim	2:20-cv-08705	
Hoskins, Patricia	2:20-cv-08547	
Howard, Susan	2:20-cv-11529	
Howe, Karon	2:20-cv-03785	
Huff, Terri Linn	2:20-cv-09276	
Hulford, Jovelyn V.	2:20-cv-09517	
Hunt, Haley	2:20-cv-10085	
Hymel, Andre	2:20-cv-08589	
Jackson, Darla	2:20-cv-07826	
Jacobson, Debbie	2:20-cv-09192	
Jenkins, Lauree	2:20-cv-08553	
Johnson, Deborah	2:20-cv-09228	
Johnson, Jeana	2:20-cv-09449	
Johnson, Rachel	2:20-cv-08685	
Juhola, Sandra	2:20-cv-05711	

Plaintiff	Case No.	Multi-Plaintiff
Jungbluth, Sachiko	2:20-cv-10773	
Kabbes, Lauren	2:20-cv-09202	
Kampen, Joy	2:20-cv-09425	
Kantor, Megan	2:20-cv-08682	
Kazmier-Mahalik, Victoria	2:20-cv-11917	
Kent, Jeanette	2:20-cv-08651	
Kern, Carrie B.	2:20-cv-11340	
Keyes, Sheila	2:20-cv-08903	
Kimerer, Jean	2:20-cv-09735	
Knight, Rita	2:20-cv-08895	
Kostenski, Margaret	2:20-cv-12053	
Krause, Laurie Jean	2:20-cv-09736	
Kremer, Melissa	2:20-cv-12118	
Kurtz, Ann	2:20-cv-03783	
Kyle, Megan	2:20-cv-06995	
Larkin, Donna	2:20-cv-10250	
Laster, Jennie	2:20-cv-06002	
Lawrence, Ann	2:20-cv-08956	
LeBlanc, Katie	2:20-cv-08890	
Lee-Pietrogallo, Zona	2:20-cv-07672	

Plaintiff	Case No.	Multi-Plaintiff
Lewis, Candice	2:20-cv-09503	
Lewis, Sandra	2:20-cv-09144	
Lindsey, Demetria	2:20-cv-10216	
Lipscomb, Sherrie	2:20-cv-08688	
Mackey, Debra	2:20-cv-10146	
Madden, Tracy	2:20-cv-08551	
Maddox, Candice Nicole	2:20-cv-10212	
Maggard, Michelle	2:20-cv-08272	
Malone, Sandy	2:20-cv-08615	
Maupin, Laurie	2:20-cv-08936	
McCoy, Candace	2:20-cv-08598	
McDonald, Sheila	2:20-cv-10036	
McDuffee, Patricia	2:20-cv-02940	
Mello, Anna	2:20-cv-11493	
Menchaca, Melissa	2:20-cv-09050	
Messick, Melissa	2:20-cv-08952	
Milburn, Heather	2:20-cv-09161	
Miller, Amanda	2:20-cv-10210	
Mirzaei, Mahnaz	2:20-cv-07126	

Plaintiff	Case No.	Multi-Plaintiff
Mitchell, Lori	2:20-cv-09176	
Mitchell, Shelley	2:20-cv-08687	
Moffitt-Coleman, Jessica	2:20-cv-04791	
Monistere, Shae Lynn	2:20-cv-09310	
Monroe, Jennifer	2:20-cv-08207	
Moreau, Candice M.	2:20-cv-09387	
Morris, Michelle	2:20-cv-07118	
Morrow, Shelley	2:20-cv-07992	
Mumphrey, Courtney	2:20-cv-10211	
Napier, Gail	2:20-cv-09281	
Naquin, Dawn	2:20-cv-12134	
Nobles, Kristin	2:20-cv-00028	
Noe, Ingrid	2:20-cv-08201	
Oxford, Mellisa	2:20-cv-08683	
Pack, Barbara	2:20-cv-07274	
Parr, Paulette	2:20-cv-00859	
Patrizio, Andree	2:20-cv-09511	
Pendleton, Joan	2:20-cv-04346	
Peterson, Michelle	2:20-cv-09147	
Pickard, Dawn	2:20-cv-07989	

Plaintiff	Case No.	Multi-Plaintiff
Platt, Kimberly	2:20-cv-03501	
Ploeger, Ann	2:20-cv-07986	
Pohlmann, Trudy	2:20-cv-09353	
Pomush, Bonnie	2:20-cv-09068	
Poniatowski, Kendra F.	2:20-cv-01706	
Pounds, Brittney	2:20-cv-09014	
Powell, Judith	2:20-cv-06996	
Ramirez, Rhoda	2:20-cv-11525	
Rehbein, Ashlee	2:20-cv-10213	
Reilly-Akers, Angelica	2:20-cv-09054	
Resendez, Danielle	2:20-cv-08619	
Rogers, Cindy; Rogers, Paul; Perna, Constance; Perna, Darren; Isaacs-Johnson, Valerie; Dahlgren, April; Strauss-Jossan, Pauline	2:20-cv-12609	Y
Rogers, Conita	2:20-cv-08934	
Ronolo, Michelle	2:20-cv-09171	
Ross, Dianna	2:20-cv-09512	
Rowe, Anita Karen	2:20-cv-11918	
Russell, Julie	2:20-cv-03525	
Salinas, Patricia	2:20-cv-10143	
Sargent, Jennifer	2:20-cv-09200	

Plaintiff	Case No.	Multi-Plaintiff
Sasher, Adrean Henson	2:20-cv-09388	
Scharf, Angela	2:20-cv-00033	
Schelles, Michelle	2:20-cv-08998	
Schlink, Tracey	2:20-cv-09226	
Schutt, Brittany	2:20-cv-10654	
Sells, April	2:20-cv-09295	
Sensebe, Haley	2:20-cv-08708	
Seuzeneau, Lori R.	2:20-cv-10089	
Shaffer, Jenifer	2:20-cv-08891	
Shanks, Lois	2:20-cv-09303	
Shelton, Kateland Leigh	2:20-cv-09505	
Sherman, Laura	2:20-cv-09544	
Shtauber, Ashira G.	2:20-cv-09392	
Silvester, Jeannie	2:20-cv-09738	
Sirgo, Jeanelle	2:20-cv-08689	
Skaggs, Mary	2:20-cv-09297	
Skelton, Vivian	2:20-cv-07057	
Small, Carol	2:20-cv-09515	
Smith, Patricia	2:20-cv-09760	
Smith, Robin	2:20-cv-09282	

Plaintiff	Case No.	Multi-Plaintiff
Sodemann, Beverly	2:20-cv-03502	
Stauffer-Snyder, Tammra	2:20-cv-09296	
Stephens, Jannie	2:20-cv-09978	
Stimatze, Michele	2:20-cv-07182	
Strassell, Kristen	2:20-cv-08665	
Stull, Rachel	2:20-cv-03031	
Susic, Beth	2:20-cv-06785	
Syvertson, Patti	2:20-cv-00944	
Tadlock, Mary	2:20-cv-09279	
Talley, Tina Lyn	2:20-cv-07803	
Taraczkozy, Tina	2:20-cv-09298	
Tate, Hannah	2:20-cv-08900	
Taylor, Tracy	2:20-cv-09335	
Tedford, Chastity	2:20-cv-09266	
Thompson, Felicia	2:20-cv-08906	
Torres, Juanita	2:20-cv-09383	
Touchet, Dodie	2:20-cv-09172	
Tournear, Kimberly Ann	2:20-cv-10231	
Triplett, Amy	2:20-cv-09237	
Vargas, Delores	2:20-cv-09057	

Plaintiff	Case No.	Multi-Plaintiff
Velez, Diana	2:20-cv-08445	
Vermeland, Roxane	2:20-cv-07492	
Veron, Paige	2:20-cv-11347	
Vidrine, Tiffany Johnson	2:20-cv-08897	
Vince, Kelle	2:20-cv-11920	
Walen, Gloria	2:20-cv-02956	
Walker, Alicia Suzanne	2:20-cv-06994	
Walker, Rachel	2:20-cv-09284	
Waterston, Brandy Michelle	2:20-cv-09395	
Welbron, Rhonda	2:20-cv-09324	
Wentland, Deborah	2:20-cv-11526	
West, Dana	2:20-cv-09146	
West, Lauren	2:20-cv-09342	
Whitstine, Jonell	2:20-cv-08654	
Wilkins, Carolyn Sue	2:20-cv-09311	
Wilkins, Sharon	2:20-cv-09214	
Wilkinson, Jenny Lee	2:20-cv-03482	
Williams, Bobbie	2:20-cv-09216	
Williams, Julie	2:20-cv-09287	
Wimberly, Robin	2:20-cv-08690	

Plaintiff	Case No.	Multi-Plaintiff
Woods, Vicki	2:20-cv-08057	
Wykle, Anna	2:20-cv-09208	
Young, Barbara	2:20-cv-08892	
Ziegler, Sherri	2:20-cv-07982	

EXHIBIT C

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: ALLERGAN BIOCELL
TEXTURED BREAST IMPLANT
PRODUCTS LIABILITY LITIGATION

Plaintiff[s]:

Case No.:

MDL NO. 2921

Honorable Brian R. Martinotti
District Court Judge

Honorable Joseph A. Dickson
Magistrate Judge

MASTER SHORT-FORM
COMPLAINT FOR PERSONAL
INJURIES, DAMAGES AND
DEMAND FOR JURY TRIAL

1. Plaintiff(s) _____, hereby state and incorporate by reference all of the allegations contained in Plaintiffs' Master Long Form Complaint For Personal Injuries, Damages and Demand For Jury Trial ("Master Complaint") as permitted by Case Management Order No. ____ for cases filed directly into this district.
2. In addition to the below-indicated portions of the Master Complaint adopted by the plaintiff(s) and incorporated by reference herein, Plaintiff(s) hereby allege(s) as follows:

**IDENTIFICATION OF PLAINTIFFS AND RELATED INTERESTED
PARTIES**

3. Name and current residence of individual who is alleged to have suffered personal injuries and related damages due to implantation of one or more Biocell Textured Breast Implant medical devices ("Biocell"):
4. Consortium Claim(s): Name and current residence of individual(s) alleging damages for loss of consortium:

5. If a survival and/or wrongful death claim is asserted:

Name and residence of Decedent when she suffered Biocell-related injuries and/or death:

Name and current residence of the individual(s) bringing the claims on behalf of the decedent's estate, and status (i.e., personal representative, administrator, next of kin, successor in interest, etc.):

VENUE

6. Plaintiff[s] allege that venue for remand and trial is proper in the following federal judicial district:

District of _____

DEVICE IDENTIFICATION

7. [Plaintiff/Decedent] used the following Biocell device[s], which Plaintiff contends caused her injury(ies). Check all that apply and provide all dates of implant and explant:

<input type="checkbox"/> NATRELLE Silicone-filled Breast Implants <input type="checkbox"/> Style 110 <input type="checkbox"/> Style 115 <input type="checkbox"/> Style 120 Date[s] of Implant: Date[s] of Explant (if any):	<input type="checkbox"/> NATRELLE Saline-Filled Breast Implants <input type="checkbox"/> Style 163 <input type="checkbox"/> Style 168 <input type="checkbox"/> Style 363 <input type="checkbox"/> Style 468 Date[s] of Implant: Date[s] of Explant (if any):
<input type="checkbox"/> NATRELLE 410 Highly Cohesive Anatomically Shaped Silicone-Filled Breast Implants <input type="checkbox"/> Style LL	<input type="checkbox"/> NATRELLE INSPIRA Silicone-Filled Breast Implants <input type="checkbox"/> Style TRL <input type="checkbox"/> Style TRLP <input type="checkbox"/> Style TRM

<ul style="list-style-type: none"> <input type="checkbox"/> Style LM <input type="checkbox"/> Style LF <input type="checkbox"/> Style LX <input type="checkbox"/> Style ML <input type="checkbox"/> Style MM <input type="checkbox"/> Style MF <input type="checkbox"/> Style MX <input type="checkbox"/> Style FL <input type="checkbox"/> Style FM <input type="checkbox"/> Style FF <input type="checkbox"/> Style FX <p>Date[s] of Implant:</p> <p>Date[s] of Explant (if any):</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Style TRF <input type="checkbox"/> Style TRX <input type="checkbox"/> Style TSL <input type="checkbox"/> Style TSLP <input type="checkbox"/> Style TSM <input type="checkbox"/> Style TSF <input type="checkbox"/> Style TSX <input type="checkbox"/> Style TCL <input type="checkbox"/> Style TCLP <input type="checkbox"/> Style TCM <input type="checkbox"/> Style TCF <input type="checkbox"/> Style TCX <p>Date[s] of Implant:</p> <p>Date[s] of Explant (if any):</p>
<p><input type="checkbox"/> McGhan BioDIMENSIONAL® Silicone-Filled BIOCELL® Textured Breast Implants, Style 153</p> <p>Date[s] of Implant:</p> <p>Date[s] of Explant (if any):</p>	<p><input type="checkbox"/> NATRELLE Dual-Gel Breast Implants</p> <ul style="list-style-type: none"> <input type="checkbox"/> Style LX <input type="checkbox"/> Style MX <input type="checkbox"/> Style FX. <p>Date[s] of Implant:</p> <p>Date[s] of Explant (if any):</p>
<p><input type="checkbox"/> NATRELLE Komuro Breast Implants</p> <ul style="list-style-type: none"> <input type="checkbox"/> Style KML <input type="checkbox"/> Style KMM <input type="checkbox"/> Style KLL <input type="checkbox"/> Style RLM <p>Date[s] of Implant:</p> <p>Date[s] of Explant (if any):</p>	<p><input type="checkbox"/> NATRELLE Ritz Princess Breast Implants</p> <ul style="list-style-type: none"> <input type="checkbox"/> Style RML <input type="checkbox"/> Style RMM <input type="checkbox"/> Style RFL <input type="checkbox"/> Style RFM <p>Date[s] of Implant:</p> <p>Date[s] of Explant (if any):</p>
<p><input type="checkbox"/> NATRELLE 150 Full Height and Short Height double lumen implants.</p> <p>Date[s] of Implant:</p> <p>Date[s] of Explant (if any):</p>	<p><input type="checkbox"/> NATRELLE 133 Plus Tissue Expander</p> <p>Date[s] of Implant:</p> <p>Date[s] of Explant (if any):</p>
<p><input type="checkbox"/> NATRELLE 133 Tissue Expander with Suture Tabs</p>	<p><input type="checkbox"/> OTHER (Please describe):</p>

Date[s] of Implant:	Date[s] of Implant:
Date[s] of Explant (if any):	Date[s] of Explant (if any):

PLAINTIFF'S BIOCELL-RELATED INJURIES

8. Plaintiff[s] allege that one or more Biocell devices caused personal injuries and damages including but not limited to the following:

9. Approximate date of Biocell-device related injury:

10. Has Plaintiff or Plaintiff's decedent ever been diagnosed with BIA-ALCL:

- Yes
- No

a. If Yes, date of diagnosis: _____

CAUSES OF ACTION

11. The following claims asserted in the *Master Complaint* are herein adopted by Plaintiff(s):

- Count I: Strict Liability – Manufacturing Defect
- Count II: Negligent Manufacturing
- Count III: General Negligence
- Count IV: Strict Liability Failure to Warn
- Count V: Negligent Failure to Warn
- Count VI: Negligent Misrepresentation
- Count VII: Breach of Implied Warranty of Merchantability
- Count VIII: Breach of Express Warranty
- Count IX: Strict Liability Design Defect
- Count X: Negligent Design
- Count XI: Survivorship and Wrongful Death
- Count XII: Loss of Consortium
- Count XIII: Punitive Damages

Other Claims and factual basis therefore:

OTHER DEFENDANTS

12. Plaintiff(s) further bring claims against the following additional Defendants not named in the *Master Complaint*:

a. Additional Defendant(s):

Additional Defendant 1: _____

Additional Defendant 2: _____

Additional Defendant 3: _____

Additional Defendant 4: _____

b. Address(es) of Additional Defendants:

Address of Defendant 1: _____

Address of Defendant 2: _____

Address of Defendant 3: _____

Address of Defendant 4: _____

c. Short and Plain Statement of Factual Allegations against Additional Defendants:

d. Claims asserted against Additional Defendants:

WHEREFORE, Plaintiff(s) pray(s) for relief and demand(s) a trial by jury as set forth in the Plaintiffs' Master Personal Injury Long Form Complaint in MDL 2921 in the United States District Court for the District of New Jersey.

Date:

Attorney Name:

Attorney Firm

Attorney Address:

Telephone:

Fax:

Email:

Counsel for Plaintiffs

EXHIBIT D

List of Multi-Plaintiff Cases Subject To Severance

Plaintiff	Case No.
1. Campbell, Edith 2. Jane Doe 1 3. Davis, Tabitha 4. Douglas, Jennifer 5. Earl, Debra 6. Jane Doe 2 7. Kendra Fugate 8. Hunt-Carden, Kristin 9. Maddox, Melissa 10. Mathis, Gigi 11. Orgeron, Tammy 12. Serigne, Sabrina 13. St. Romain, Paige 14. Thompson, Aletha 15. Thompson, Joanie 16. Thurman, Tammy 17. Tuoheym Donna 18. Walker, Patricia 19. Whitcomb, Lisa	2:20-cv-09956
1. Choonyup Wei 2. Insun Cho 3. Eunjin Lee 4. Yunjae Shin 5. Seoyun Hwang 6. Yunjung Lee 7. Jioh Kim 8. Haejung Cho 9. Misoon Chang 10. Heean Sohn 11. Yunjin Bae 12. Sunmi Choi 13. Myunghwa Lee 14. Soohkee Moon 15. Jungyun Lee 16. Mihwa Kwak 17. Yunmee Kang 18. Sujin Park 19. Seungshin Kim 20. Daborah Park 21. Kangsoon Jung	2:20-cv-04288

Plaintiff	Case No.
22. Eunkyung Kil 23. Jungbin Kim 24. Sunkyung Kim 25. Eunju Lee	
1. Cindy Rogers 2. Paul Rogers 3. Constance Perna 4. Darren Perna 5. Valerie Isaacs-Johnson 6. April Dahlgren 7. Pauline Strauss-Jossan	2:20-cv-12609