

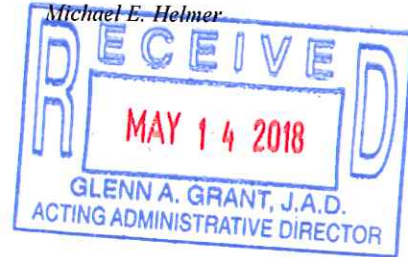


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May 14, 2018

Honorable Glenn A. Grant
Acting Administrative Director of the Courts
Attention: MCL Comments – Taxotere® (Docetaxel)
Hughes Justice Complex, P.O. Box 037
Trenton, New Jersey 08625-0037

Re: Response of Defendants Sanofi U.S. Services Inc., sanofi-aventis U.S. LLC, Accord Healthcare, Inc., Sandoz Inc., Hospira, Inc., Hospira Worldwide LLC f/k/a Hospira Worldwide, Inc., Pfizer Inc., Actavis LLC f/k/a Actavis Inc., and Sun Pharmaceutical Industries, Inc. f/k/a Caraco Pharmaceutical Laboratories, LTD to Plaintiffs' Application to Designate the Taxotere® (Docetaxel) Cases as a Multicounty Litigation for Centralized Management

Dear Judge Grant:

Defendants Sanofi U.S. Services Inc., sanofi-aventis U.S. LLC (together "Sanofi")¹ and defendants Accord Healthcare, Inc., Sandoz Inc., Hospira, Inc., Hospira Worldwide LLC f/k/a Hospira Worldwide, Inc., Pfizer Inc., Actavis LLC f/k/a Actavis Inc., and Sun Pharmaceutical Industries, Inc. f/k/a Caraco Pharmaceutical Laboratories, Ltd.² (together, the "505(b)(2)

¹ Sanofi S.A. and Aventis Pharma S.A. are both foreign entities, located in France, who contest personal jurisdiction and, as such, do not join in this response to plaintiffs' Application. Neither of these entities manufactured, sold, or distributed in the United States the product at issue. Further, by agreement of the parties, both of these foreign entities were dismissed entirely from the federal multidistrict litigation ("MDL") action currently pending in the Eastern District of Louisiana. In addition, by further agreement of the parties, the Plaintiffs' Steering Committee for the Taxotere MDL has agreed to make its best effort to see that these two entities are dismissed from any pending state court action.

² Sun Pharma Global FZE is a foreign company incorporated under the laws of the United Arab Emirates and has been named but has not been served with process, has not agreed to accept service of process in this litigation and consequently, Sun Pharma Global FZE does not join in this response and is not appearing in this matter.



Page Two

Parties”)³ submit this response to plaintiffs’ application dated March 13, 2018 (the “Application”), requesting that the New Jersey Supreme Court designate all Taxotere[®] (docetaxel) cases currently pending in New Jersey as a Multicounty Litigation (“MCL”) for centralized case management.

Defendants agree with and do not object to MCL designation of the New Jersey Taxotere[®] (docetaxel) cases for purposes of centralized management. Defendants also do not object to transfer and centralized management in Middlesex County, and subsequent assignment to the Honorable James F. Hyland. Defendants object, however, to plaintiffs’ Application to the extent it seeks an order from this Court directing the location of trials for the New Jersey Taxotere[®] (docetaxel) cases.

I. The Taxotere[®] (Docetaxel) Litigation

Taxotere[®] is a chemotherapy for the treatment of patients with various forms of cancer. For breast cancer patients, FDA has approved Taxotere[®] for use in multiple indications, including in combination with two other chemotherapies (doxorubicin and cyclophosphamide) to prevent recurrence of cancer in patients with operable, lymph node-positive breast cancer – otherwise known as “adjuvant therapy.”

Taxotere[®] is a taxane, which is a class of drugs originally derived from plants of the genus *Taxus*. Taxanes are one of the most important classes of anticancer agents due to their unique mechanism of action and broad anti-tumor activities.

³ Sanofi and the 505(b)(2) Parties shall collectively be referred to herein as “Defendants.”



Page Three

Following a comprehensive review of safety and efficacy data, FDA approved Taxotere[®] in 1996 for use with breast cancer patients in the United States. For more than two decades, Taxotere[®] has been relied upon by oncologists to treat one of the most prevalent and pernicious forms of cancer in the United States and around the world. It is included in the World Health Organization's Model List of Essential Medicines, which is defined as the "most efficacious, safe and cost-effective medicines for priority conditions."⁴

In 2010, the patent for Taxotere[®] expired, and the 505(b)(2) Parties began developing non-branded versions of docetaxel⁵ and applied for approval through Section 505(b)(2) of the Food, Drug, and Cosmetic Act (21 U.S.C. § 355(b)(2)).

Plaintiffs in this litigation are women who allege that they developed permanent alopecia (hair loss) following adjuvant chemotherapy treatment with Taxotere. Plaintiffs do not contend that Taxotere is an ineffective anti-cancer agent or that it failed to treat their life-threatening disease. Instead, they claim that, for some women, the hair loss that normally occurs during chemotherapy has continued beyond chemotherapy. Central to their complaint is the claim that, despite clear language in the Taxotere label regarding hair loss, Defendants failed to adequately warn them of this risk.

Taxotere has never been recalled by FDA because of claims of hair loss or withdrawn for

⁴ See World Health Organization, *WHO Model List of Essential Medicines*, http://www.who.int/medicines/publications/essentialmedicines/EML_2015_FINAL_amended_NOV2015.pdf?ua=1 (amended November 2015).

⁵ Taxotere[®] and the non-branded versions of docetaxel manufactured by the 505(b)(2) Parties shall collectively be referred to herein as "Taxotere."



Page Four

any patient safety or efficacy reasons. No “black box” warning has been added to the product’s label concerning permanent hair loss, and no urgent safety notice has been issued. Rather, these lawsuits⁶ began to be filed after a label change in 2015 stating that “cases of permanent alopecia have been reported (frequency unknown).” Nobody is suggesting that Taxotere should not be available to doctors and patients. In contrast, Taxotere remains at the forefront of treating breast cancer.

Unlike some pharmaceutical mass tort litigations, this is not a “rush to market” story, whereby physicians learned too late of some previously unknown and dangerous side effect. Rather, Taxotere was discovered after a lengthy, multi-decade effort to find a sustainable way to provide sufficient taxanes to treat the women who need them the most. Nor did Defendants “conceal” or “hide” data on hair loss from FDA. To the contrary, hair loss has always been identified in the labeling, and for almost ten years Defendants have submitted detailed safety information to FDA concerning hair loss following the use of Taxotere.⁷

At a basic level, this litigation is about a few key issues for each individual plaintiff:

- First, would the plaintiff’s oncologists have changed their prescribed chemotherapy treatment as a result of the language added to the Taxotere label in 2015 stating that “cases of permanent alopecia have been reported”—information known publicly for many years?
- Is the plaintiff’s hair loss permanent? Or did her hair temporarily change after she underwent chemotherapy treatment—a commonly known side effect of all chemotherapies?

⁶ There are approximately 8,000 cases filed nationally, and all of these were filed after the 2015 label change. Approximately 7,500 of these cases are coordinated in the federal MDL in the Eastern District of Louisiana.

⁷ Sanofi has been submitting detailed safety information to FDA concerning Taxotere[®] for more than two decades.



Page Five

- Is the hair loss that plaintiff claims to have sustained caused by Taxotere or some other cause?
- Did the plaintiff actually take Taxotere[®]? Since 2011, numerous companies have sold different versions of this product. Product identification is a core issue in each of the cases.

These common, recurrent, and complex issues of fact and law support MCL coordination. *See* N.J. COURTS, MULTICOUNTY LITIGATION GUIDELINES, DIRECTIVE #08-12. MCL designation of the New Jersey state court Taxotere[®] (docetaxel) litigation will enable the parties to conduct coordinated discovery in an efficient manner and avoid duplication of efforts by the parties. MCL designation will also conserve judicial resources and prevent the risk of inconsistent pretrial rulings. *Id.*

II. The Taxotere[®] (Docetaxel) MDL

The existence of a mature federal MDL also provides justification for coordinated proceedings. On October 4, 2016, the Judicial Panel on Multidistrict Litigation (“JPML”) transferred 28 Taxotere[®] actions to the United States District Court for the Eastern District of Louisiana for consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407. *See In re Taxotere (Docetaxel) Prod. Liab. Litig.*, MDL No. 2740, 2016 WL 5845996 (U.S. Jud. Pan. Mult. Lit. Oct. 4, 2016). Since that time, additional cases have been transferred to the Eastern District of Louisiana pursuant to Conditional Transfer Orders of the JPML. There are now approximately 7,500 cases pending in the MDL before Judge Engelhardt.⁸ The MDL is currently in the

⁸ On May 9, 2018, the United States Senate confirmed Judge Engelhardt’s nomination to the Fifth Circuit Court of Appeals. Pending appointment by the JPML, Judge Jane Triche Milazzo will preside over the Taxotere[®] (docetaxel) MDL.



Page Six

discovery phase and the first trial is expected to be scheduled for 2019. Many of the counsel for plaintiffs in the New Jersey state court litigation also represent plaintiffs in the MDL and several have leadership positions in the MDL.

The New Jersey MCL judge will benefit considerably from the federal MDL. Centralization will help facilitate coordination between the MCL judge and the MDL judge so that they can avoid duplication of efforts and conserve judicial resources. *See* N.J. MULTICOUNTY RESOURCE BOOK (noting that “coordination can achieve major gains in efficiency and economy”). It will also facilitate the sharing of ideas and expertise, case management strategies, and perspectives for appropriate state-federal cooperation. *Id.* Indeed, the MDL court has already entered numerous case-management and discovery orders that could easily be implemented here, including a protective order and orders governing Plaintiff and Defendant Fact Sheets, product identification requirements, and the production of electronically-stored information. Coordinated proceedings will also enable the MCL judge and the MDL judge to conduct joint hearings, make joint rulings, and consult on matters of procedural or substantive law. *Id.*

III. Legal And Factual Issues That Will Likely Arise

a. Causation

Alopecia is generally defined as absence of hair from areas of the body where it normally grows.⁹ There is no doubt that hair loss of any kind can have a significant impact on a patient’s

⁹ *See, e.g.*, Merriam-Webster Dictionary, <http://www.merriam-webster.com/dictionary/alopecia> (last visited May 14, 2018).



Page Seven

appearance and self-image—nobody suggests otherwise. But what is “permanent” hair loss? Does that mean medically irreversible without any possibility of regrowth? If so, at what point did hair loss become “permanent”? And how was it diagnosed? Moreover, hair loss, hair growing back slower than desired, and changes in the texture or appearance of the hair that regrows are common and well-known side effects of nearly all chemotherapies.

It is likely that most (if not all) plaintiffs will have taken Taxotere[®] or docetaxel as part of a complex, multi-drug chemotherapy regimen, each of which has its own unique risk-benefit profile. Each plaintiff will have the burden of demonstrating that she has been diagnosed with alopecia, that her diagnosis is considered permanent, and that the cause of her alleged alopecia was Taxotere, and not any other product, medical condition, or family history.

b. Statute of Limitations

Statute of limitations will be a significant issue for many plaintiffs. For example, plaintiff Augusta Clement “was administered Taxotere (docetaxel) between approximately June and September 2003,” yet did not file suit until December 11, 2017. With most statutes of limitation expiring two years after exposure (including New Jersey, *see* N.J. STAT. ANN. § 2A:14-2), and a significant number of jurisdictions that include statutes of repose that run ten years after sale (including New Jersey, *see* N.J. STAT. ANN. § 2A:14-1.1), the issue of whether these claims are untimely must be decided early in the litigation.

c. Product Identification

Product identification is another threshold issue in the Taxotere[®] (docetaxel) litigation



Page Eight

that will need to be addressed at the outset of this MCL proceeding. Starting in 2011, FDA began approving different, non-generic forms of Taxotere[®] (*i.e.*, docetaxel). At present, there are at least nine different pharmaceutical companies that manufacture and sell a version of docetaxel in the United States. Although a plaintiff's medical and healthcare facility records are likely to provide information about which manufacturer's product the plaintiff was administered, the majority of plaintiffs who have filed cases in New Jersey have named all manufacturers and do not allege which Defendant actually manufactured the specific docetaxel the plaintiff received.

A simple, streamlined order should be implemented in this MCL requiring plaintiffs to come forward with sufficient evidence of product identification within 60 days of the MCL being formed.

IV. Issues Specific to the 505(b)(2) Parties

Section 505(b)(2) was enacted as part of the Drug Price Competition and Patent Term Restoration Act of 1984, which provided shortened pathways for drug approval. Section 505(b)(2) permits applicants to rely on the finding of safety and effectiveness of the reference listed drug (in this case Taxotere[®]) to the extent the product seeking approval and the listed drug are the same. This pathway to approval and the regulatory status of the 505(b)(2) Parties are expected to raise certain unique legal and factual issues in this litigation and the federal MDL, which further supports coordination between proceedings here and in the MDL.

V. Anticipated Dismissals of Duplicative New Jersey Cases

There are currently 349 Taxotere[®] (docetaxel) cases filed in New Jersey. Many of these



Page Nine

cases were duplicate or triplicate filed elsewhere, including California state court, Illinois state court, and even directly in the MDL. On April 6, 2018, several Defendants filed a motion in the MDL to dismiss the duplicate cases filed by the Napoli Shkolnik firm. In exchange for an agreement by Defendants to withdraw that Motion, Napoli Shkolnik entered into a Stipulation with Defendants to voluntarily dismiss 175 New Jersey state court cases, as well as other duplicate cases filed elsewhere. Ex. 1, MDL Stipulation; Ex. 2, MDL Duplicate Filings Chart. On May 2, 2018, the Napoli firm confirmed to Your Honor its agreement to dismiss these duplicate New Jersey cases. Ex. 3, May 2, 2018 Letter. In addition, the parties are working to resolve other duplicate actions. After the Napoli Shkolnik duplicate cases are dismissed, as well as several other cases in the process of being dismissed, there will be approximately 168 Taxotere[®] (docetaxel) cases in New Jersey. Although approximately half of the cases will soon be dismissed, MCL coordination is still appropriate for the same reasons discussed above.

VI. Plaintiffs' Trial Venue Request Should Be Denied Without Prejudice

Plaintiffs request as part of their application for MCL treatment that “[a]t the conclusion of all pre-trial proceedings in the MCL, the New Jersey Plaintiff’s case should be returned to the plaintiff’s chosen county for trial.” Application at 6. The Supreme Court should decline to issue an advisory opinion with the respect to the appropriate venue for trial. *See Zamboni v. Stamler*, 199 N.J. Super. 378, 383 (App. Div. 1985) (“We will not render advisory opinions or function in the abstract”). There will likely be various venue issues for an MCL judge to address in these cases, and all parties should be deemed to reserve their rights to make venue-related motions. It



Page Ten

appears, for example, that only ten of the remaining 168 plaintiffs filed their Complaints in their “home” counties, and only 69 of the remaining plaintiffs are residents of New Jersey. *See* Ex. 4, Chart of Non-Duplicate Plaintiffs’ County of Residence and Venue. Instead, the vast majority of plaintiffs filed their Complaints in Bergen County, irrespective of where the individual plaintiff resides. *Id.* The Honorable Bonnie J. Mizdol, A.J.S.C, transferred the Bergen filed cases to Middlesex County sua sponte because they had “no nexus to the Bergen County vicinage other than the defendants’ doing business [there].” Ex. 5, Omnibus Order. The MCL judge will be well positioned to address case-specific venue issues, including as to trial venue, in an orderly manner.

In addition, some of the 505(b)(2) Parties, such as Accord Healthcare, Inc., are not incorporated in New Jersey and do not have a principal place of business in New Jersey. Accordingly, the 505(b)(2) Parties likewise object to plaintiffs’ request to transfer venue since this determination is more appropriately made by the MCL judge on a case-by-case basis, and all parties should be deemed to reserve their rights to make venue-related motions.

VII. Conclusion

In light of all the factors discussed above, and for the reasons set forth in plaintiffs’ Application, Defendants respectfully request that the New Jersey Supreme Court designate the Taxotere[®] (docetaxel) cases for MCL management in the Middlesex County Superior Court before Judge James F. Hyland.



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cc. Hon. James F. Hyland, J.S.C. (*via overnight mail*)
Hon. Jamie D. Happs, P.J.Cv. (*via overnight mail*)
All Known Plaintiffs' Counsel (*via electronic mail*)

EXHIBIT 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

IN RE: TAXOTERE (DOCETAXEL))
PRODUCTS LIABILITY LITIGATION)
)
)
THIS DOCUMENT RELATES TO:)
ALL ACTIONS)

MDL No. 2740

SECTION: "N" (5)

CASE MANAGEMENT ORDER NO. 12
(PRODUCT IDENTIFICATION ORDER)

Amended Pretrial Order No. 22 (Rec. Doc. 325) requires each Plaintiff to submit to the Defendants a complete and verified Plaintiff Fact Sheet ("PFS") to be accompanied by all responsive documents in Plaintiff's possession within seventy-five (75) days of the date the case is docketed in this MDL. The PFS has both questions related to the identification of the Taxotere/docetaxel/docefrez ("docetaxel") infused and to the production of records to identify the manufacturer of the docetaxel infused. *See* Pretrial Order 18, Attachment 1 (Rec. Doc. 236-1).¹

Recognizing the importance of determining product identification in MDL 2740, **IT IS ORDERED** that:

1. Within fifteen (15) days of the entry of this Order, or within thirty (30) days after filing a Short Form Complaint, each Plaintiff must make a diligent, good faith, and documented effort to: (a) determine the facility, center, hospital, or clinic (hereinafter "infusion facility") in which the Plaintiff was infused with docetaxel; (b) determine the time frame Plaintiff was treated with docetaxel at such infusion facility; and (c) request, order, and ultimately pay for medical,

¹ Pretrial Order No. 18 (Rec. Doc. 236) requires each Plaintiff's PFS to be accompanied by any "records demonstrating use of Taxotere® or other docetaxel" in the Plaintiff's possession. If the manufacturer of such docetaxel is unknown, the Plaintiff must certify to have made "reasonable, good faith efforts to identify the manufacturer of the Docetaxel used in my treatment, including requesting records from my infusion pharmacy." *See* Pretrial Order No. 18, Attachment 1 at Part III (Rec. Doc. 236-1).

pharmacy, billing (*i.e.*, a patient itemized statement), and/or insurance billing records from such infusion facility containing the National Drug Code (“NDC”) number(s) for the docetaxel Plaintiff received, or other proof of the identity of the manufacturer of the docetaxel Plaintiff received as provided in Paragraph 6 of this Order (“Product ID Information”). All initial requests for records containing Product ID Information shall be in writing and accompanied by a medical authorization signed by the Plaintiff. Plaintiff is strongly encouraged to contact the infusion facility by telephone before sending such written request to determine where and/or to whom such written request(s) should be sent.² The written request shall request production of such Product ID Information no more than thirty (30) days after the written request. If Plaintiffs have substantially complied with these obligations prior to the entry of this Order, they shall notify Defendants in accordance with Paragraph 3 of this Order, within seven (7) days of entry of this Order.

2. If records are not received within thirty (30) days of the issuance of the written request, Plaintiff shall make a diligent, good faith, and documented effort to follow-up with the infusion facility in writing and/or by phone to obtain (i) Product ID Information; or (ii) written notice that the infusion facility either does not possess Product ID Information or will not provide Product ID Information to Plaintiff.

3. If Plaintiff has not received Product ID Information within thirty (30) days of the Plaintiff’s initial written request, or if Plaintiff receives written notice from the infusion facility that it does not possess or will not disclose Product ID Information to Plaintiff, Plaintiff shall notify the named Defendant(s) in writing within seven (7) days, through Defense Liaison Counsel (John

² Plaintiffs should recognize that infusion facilities may maintain and/or store patient records in different departments and/or locations. For instance, medical records may be maintained in the records department while billing records may be maintained in the billing department.

Olinde – 505b2liaison@chaffe.com and Douglas Moore – dmoore@irwinllc.com) and the contact person for the Defendant(s) named and served in the lawsuit,³ that Product ID Information has not been received and shall provide Defendant(s) with the following information: (i) Plaintiff's name; (ii) Plaintiff's MDL case number; (iii) copies of all written requests for Product ID Information sent by Plaintiff to the infusion facility; (iv) copies of all documented responses from the infusion facility to Plaintiff; and (v) an executed certification by Plaintiff or Plaintiff's counsel certifying that Plaintiff has made a diligent, good faith, and documented effort to obtain Product ID Information.

4. Within fourteen (14) days of receiving notice from Plaintiff that Plaintiff has not obtained Product ID Information, each named and served Defendant shall determine whether it possesses Product ID Information for Plaintiff. If the named and served Defendant possesses Product ID Information, it shall provide all parties to the action with such Product ID Information within the fourteen (14) day period. If a named and served Defendant does not possess Product ID Information, within twenty-one (21) days of notification to the Defendants that Plaintiff has taken all the steps described above, the named and served Defendants shall collectively send one letter to the infusion facility, identifying themselves as manufacturers of docetaxel and requesting Product ID Information to be produced within fourteen (14) days of receipt of the letter. If the infusion facility provides Product ID Information, Defendants shall provide counsel for Plaintiff and Plaintiffs' Liaison Counsel a copy of the response from the infusion facility within seven (7) days of receipt of the Product ID Information. Should the infusion facility fail to provide the Defendants with Product ID Information within thirty (30) days of Defendants' letter to the

³ The name and email address of the contact person for each Defendant are listed in Exhibit A attached hereto.

infusion facility, Defendants shall provide counsel for Plaintiff a copy of the request letter to, and any responses from, the infusion facility.

5. Within seven (7) days of Plaintiff receiving notice that named Defendant(s) do not possess Product ID Information after Defendants have taken the steps set forth in the preceding paragraph, Plaintiff shall issue a subpoena requiring the infusion facility to release Product ID Information within fourteen (14) days. Plaintiff shall provide a copy of the subpoena pursuant to FRCP 45, through Defense Liaison Counsel (John Olinde – 505b2liaison@chaffe.com and Douglas Moore – dmoore@irwinllc.com) and the contact person for the Defendant(s) named and served in the lawsuit.⁴ If the infusion facility fails to comply with the subpoena, the Court shall take appropriate action.

6. The following information is presumed sufficient evidence to establish the identity of the manufacturer(s) or labeler of docetaxel in this MDL:

- a. National Drug Code (“NDC”) numbers contained in a patient’s medical, pharmacy, billing or insurance records; or
- b. A Certificate of Authenticity of Product Identification Administered (“Certification”) identifying the manufacturer(s) or labeler for Plaintiff and the correct dates of treatment, signed by an authorized person on behalf of the patient’s infusion pharmacy, treatment facility, or other authorized health care professional. Such Certification need not be notarized and can be in the form of the Certification attached hereto as Exhibit B.

⁴ The name and email address of the contact person for each Defendant are listed in Exhibit A attached hereto.

- c. Medical and/or billing records showing that docetaxel was administered prior to March 8, 2011, is evidence that the docetaxel was manufactured by sanofi.

7. If Plaintiff obtains Product ID Information, Plaintiff shall upload such evidence to MDL Centrality within seven (7) days of receipt of such evidence. Plaintiff shall submit such evidence under the "Product Identification" document type field.

8. Where Product ID Information exists, Defendants in MDL 2740 will not dispute such evidence without offering testimonial or documentary evidence to rebut the presumption. If any party obtains contrary testimonial or documentary evidence regarding Product ID Information, it shall notify counsel for all named parties of the existence of such evidence within seven (7) days of its discovery. If such evidence is not produced by the close of discovery once a case is identified in a trial scheduling order, the existing Product ID Information will be deemed affirmative evidence of the identity of the manufacturer or labeler of a plaintiff's docetaxel, absent good cause shown.

9. Within fourteen (14) days of the date Plaintiff uploads the Product ID Information to MDL Centrality, Plaintiff shall voluntarily dismiss any and all named Defendants not identified by the Product ID Information.

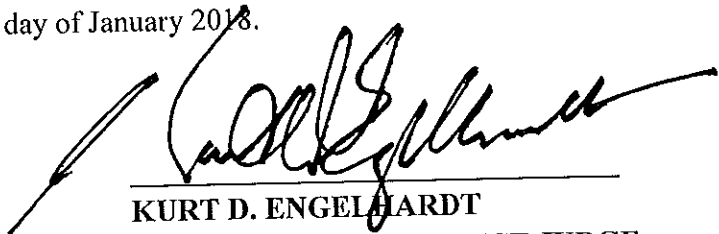
10. If Plaintiff fails to voluntarily dismiss any Defendant not identified by the Product ID Information within fourteen (14) days of the date Plaintiff uploads such evidence to MDL Centrality, such Defendant may place the issue on the Agenda for the next Status Conference. No briefing is required. Twenty-one (21) days prior to the next Status Conference, Defense Liaison Counsel shall identify to Plaintiffs' Liaison Counsel the cases Defendants intend to place on the Agenda for the next Status Conference pursuant to this Order. Any case naming Defendants without proper Product ID Information at the time of that Status Conference will be subject to an

Order to Show Cause, returnable at the following Status Conference, which will require Plaintiff to show cause why her claims against said Defendant (s) should not be dismissed.

11. Any Plaintiff who has served a PFS as of the date of this Order and fails to comply with the requirements of Paragraphs 1-3 within forty-five (45) days of this Order, or fails to comply with the requirements of Paragraph 5, shall be subject to dismissal upon motion by Defendants, absent good cause shown. For all other Plaintiffs, failure to comply with Paragraphs 1-3 of this Order within the time permitted to serve a PFS under Amended Pretrial Order No. 22 (Rec. Doc. 325), or failure to comply with the requirements of Paragraph 5 of this Order, shall subject such Plaintiff to dismissal upon motion by Defendants, absent good cause shown.

12. Any Plaintiff who lacks Product ID Information after complying with Paragraphs 1-5 of this Order shall be authorized to conduct discovery to the relevant infusion facility, distributor, and healthcare providers, limited in scope solely to determine Product ID Information, for a period of no more than seventy-five (75) days from the issuance date on the subpoena issued pursuant to Paragraph 5 of this Order, regardless of whether a response is provided by the infusion facility. If Product ID Information is not determined following the 75-day period set forth above, Plaintiff's case may be subject to dismissal upon motion by any named Defendant.

New Orleans, Louisiana, this 12th day of January 2018.



KURT D. ENGELHARDT
UNITED STATES DISTRICT JUDGE

EXHIBIT A

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STATEMENT REGARDING CHEMOTHERAPY DRUG ADMINISTERED

PATIENT NAME: _____

DATE OF BIRTH: ____/____/____

SSN: ____/____/____

TO BE COMPLETED BY REPRESENTATIVE OF ONCOLOGIST/INFUSION CENTER

*****PLEASE MARK THE NDC FOR THE TAXOTERE/DOCETAXEL ADMINISTERED *****

SANOFI AVENTIS US LLC

- 0075-8003-01
- 0075-8004-04

**SANOFI AVENTIS US LLC
d/b/a WINTHROP US**

- 0955-1020-01
- 0955-1021-04

HOSPIRA, INC.

- 0409-0201-02
- 0409-0201-10
- 0409-0201-20
- 0409-0201-25
- 0409-0201-26
- 0409-0201-27

**McKESSON PACKAGING
SERVICES**

- 63739-932-11
- 63739-971-17

SANDOZ INC.

- 66758-050-01
- 66758-050-02
- 66758-050-03
- 66758-950-02
- 66758-950-03
- 66758-950-04

**ACCORD
HEALTHCARE, INC.**

- 16729-120-49 KIT
- 16729-228-50 KIT
- 16729-267-63
- 16729-267-64
- 16729-267-65

SAGENT PHARMACEUTICALS

- 25021-222-01
- 25021-222-04
- 25021-222-07

PFIZER LABORATORIES

- 0069-9141-11
- 0069-9141-22
- 0069-9142-11
- 0069-9142-22
- 0069-9144-11

ACTAVIS PHARMA, INC.

- 45963-734-54
- 45963-765-52
- 45963-781-74
- 45963-790-56

DR REDDYS LAB LTD.

- 43598-258-11
- 43598-259-40

TEVA PHARMS USA

- 0703-5720-01
- 0703-5730-01

NORTHSTAR RX LLC

- 16714-465-01
- 16714-500-01

EAGLE PHARMACEUTICALS

- 42367-121-25
- 42367-121-29

**SUN PHARMACEUTICAL
INDUSTRIES, INC.**

- 47335-285-41
- 47335-286-41

**PATIENT WAS NOT
ADMINISTERED
TAXOTERE/DOCETAXEL**

PATIENT
 WAS / **WAS NOT
ADMINISTERED
TAXOL/PACLITAXEL**

_____/_____/_____
DATE OF FIRST TREATMENT

_____/_____/_____
DATE OF LAST TREATMENT

OF DOSES

SIGNATURE OF REPRESENTATIVE OF
PRACTICE/INFUSION CENTER

NAME OF PRACTICE/INFUSION CENTER

PRINTED NAME & TITLE OF REPRESENTATIVE

ADDRESS

DATE

CITY, STATE, ZIP

EXHIBIT 2

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

In Re: TAXOERE (DOCETAXEL)) MDL NO. 2740
PRODUCTS LIABILITY)
LITIGATION) SECTION "N" (5)
)
)
)
)

STIPULATION CONCERNING MULTIPLE FILINGS

In exchange for the agreement by the Sanofi, Sandoz, Hospira, Pfizer, and Accord Defendants to continue and withdraw their Motion to Dismiss the Napoli Firm's Duplicate Cases as set forth below, Napoli Shkolnik PLLC agrees to do the following:

- (1) Promptly voluntarily dismiss in New Jersey state court all Taxotere/docetaxel plaintiffs who have cases filed in or removed to federal court and pending in the MDL, including those identified in the attached chart, and, by May 2, 2018, provide a letter in writing to New Jersey's Administrative Director of the Courts advising that such dismissals are forthcoming and identifying the cases by name;
- (2) Agree to not seek remand or oppose transfer to the MDL in cases removed or to be removed from New Jersey state court that name non-forum defendants Pfizer, Hospira, or Accord unless and until plaintiff provides proof of product ID involving a defendant against whom plaintiff is not diverse;
- (3) Withdraw by May 2, 2018 its four motions to remand Illinois multi-plaintiff cases, take the appropriate steps to effect severance of those plaintiffs, and limit any renewed motion

to remand to Illinois Plaintiff Rice based on product ID involving non-diverse manufacturer Hospira; and

- (4) Going forward, discontinue duplicate filings of the same plaintiff or plaintiffs and file directly in the MDL, all cases in which a plaintiff is diverse as to one or more named defendants, without waiver of the right to seek remand if and when plaintiff dismisses diverse defendants and provides proof of product ID involving a defendant against whom plaintiff is not diverse.

In consideration for Napoli Shkolnik PLLC's agreement to take the foregoing actions, the Sanofi, Sandoz, Hospira, Pfizer, and Accord Defendants agree to file by April 25, 2018 a 90-day continuance of the submission of Defendants' Motion to Dismiss. Upon the completion Napoli Shkolnik PLLC's filing of the dismissals in New Jersey and withdrawal of its motions to remand the Illinois multi-plaintiff cases as set forth above, and subject to the other agreements set forth above, Defendants will withdraw their Motion to Dismiss.

DATED: April 27, 2018

/s/ Christopher LoPalo
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Christopher LoPalo
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/s/ Douglas J. Moore
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AND

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EXHIBIT 3

Plaintiff	State of Residency	California State Court Case (Date Filed): MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Abrams, Linda	OH	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	Abrams, Linda (BER-L-8368-17) (December 7, 2017)	N/A
Acosta-Dominguez, Delma	TX	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-042699)-(December-13,-2017)	N/A	Acosta-Dominguez, Delma (BER-L-8473-17) (December 7, 2017)	N/A
Agnes, Barbara	FL	N/A	N/A	Agnes, Barbara, et al. (2:17-cv-15815) (December 8, 2017)	Agnes, Barbara (BER-L-008704-17) (December 11, 2017)	N/A
Alawar, Ferial	NC	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	Alawar, Ferial (BER-L-8403-17) (December 7, 2017)	N/A
Anderson, Cathy	MD	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	Anderson, Cathy (BER-L-8405-17) (December 7, 2017)	N/A
Anderson, Jerry	SC	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	Anderson, Jerry (BER-L-8410-17) (December 7, 2017)	N/A
Anderson, Loreta	MO	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	Anderson, Loreta (BER-L-8414-17) (December 7, 2017)	N/A
Anderson, Rose	MD	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	Anderson, Rose (BER-L-8417-17) (December 7, 2017)	N/A
Anderson, Virgie	IL	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	N/A	N/A
Argel, Gloria	CA	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	N/A	Argel, Gloria (2:17-cv-16601) (December 11, 2017)	N/A	N/A
Belin, Carolyn	SC	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	N/A	N/A	Belin, Carolyn (BER-L-8438-17) (December 7, 2017)	N/A
Benjamin, Harriet	NC	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	N/A	N/A	Benjamin, Harriet (BER-L-8443-17) (December 7, 2017)	N/A
Bernett, Sally	MS	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	N/A	N/A	Bernett, Sally (BER-L-8455-17) (December 7, 2017)	N/A
Bing, Marilyn	FL	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	N/A	N/A	Bing, Marilyn (BER-L-8481-17) (December 7, 2017)	N/A
Bloom, Janet	IL	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	N/A	N/A
Bomb, Judy	MN	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	Bomb, Judy (BER-L-8464-17) (December 7, 2017)	N/A
Borovic, Diane	OH	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-042699)-(December-13,-2017)	N/A	Borovic, Diane (BER-L-8493-17) (December 7, 2017)	N/A
Bounds, Geneva	TX	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-042694)-(December-13,-2017)	N/A	Bounds, Geneva (BER-L-8466-17) (December 7, 2017)	N/A
Boylund, Kathleen	NY	N/A	N/A	Boylund, Kathleen (2:17-cv-00793) (January 30, 2017)	Boylund, Kathleen (BER-L-8701-17) (December 11, 2017)	N/A
Bracy, Mary	DE	N/A	N/A	Bracy, Mary (2:17-cv-07799) (August 13, 2017)	Bracy, Mary (BER-L-008716-17) (December 11, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Breaux, Beverly	TX	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Breaux, Beverly (BER-L-8466-17) (December 7, 2017)	N/A
Broadie, Linda	NC	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Broadie, Linda (BER-L-8369-17) (December 7, 2017)	N/A
Brown, Remisha	CA	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	N/A	N/A	N/A	N/A
Brown, Vanetta	IL	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	N/A	N/A
Bruner, Phyllis	CA	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	N/A	N/A	N/A	N/A
Buckley, Della	MS	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Buckley, Della (BER-L-8374-17) (December 7, 2017)	N/A
Bunche, Helen	SC	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Bunche, Helen (BER-L-8375-17) (December 7, 2017)	N/A
Burnham, Rose	MD	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012699) (December 13, 2017)	N/A	Burnham, Rose (BER-L-8502-17) (December 7, 2017)	N/A
Campbell, Cheryl	WY	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012699) (December 13, 2017)	N/A	Campbell, Cheryl (BER-L-8503-17) (December 7, 2017)	N/A
Carroll, Francis	PA	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Carroll, Francis (BER-L-8397-17) (December 7, 2017)	N/A
Carroll, Linda	CT	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Carroll, Linda (BER-L-8404-17) (December 7, 2017)	N/A
Carson, Clara	FL	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Carson, Clara (BER-L-8412-17) (December 7, 2017)	N/A
Carter, Brenda	DC	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Carter, Brenda (BER-L-8425-17) (December 7, 2017)	N/A
Carter, Mary	IN	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Carter, Mary (BER-L-8433-17) (December 7, 2017)	N/A
Carter, Paulette	PA	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Carter, Paulette (BER-L-8439-17) (December 7, 2017)	N/A
Chambers, Juanita	MO	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Chambers, Juanita (BER-L-8477-17) (December 7, 2017)	N/A
Chapman, Cynthia	WI	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Chapman, Cynthia (BER-L-8482-17) (December 7, 2017)	N/A
Charette, Gloria	NC	Brown, Remisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson, Virgie et al. v. Sanofi SA, et al. (2017-L-012694) (December 13, 2017)	N/A	Charette, Gloria (BER-L-8487-17) (December 7, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Charleston, Mary	FL	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Charleston, Mary (BER-L-8495-17) (December 7, 2017)	N/A
Cheves, Cecilia	FL	Villegas, Eunice et al. v. Samoff SA, et al. (BC6866617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Samoff-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Cheves, Cecilia (BER-L-8505-17) (December 7, 2017)	N/A
Clark, Antoinette	GA	Villegas, Eunice et al. v. Samoff SA, et al. (BC6866617) (December 12, 2017); 2:18-cv-02598	Rice-Linda-et-al-v-Samoff-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Clark, Antoinette (BER-L-8506-17) (December 8, 2017)	N/A
Clark, Melody	IN	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Clark, Melody (BER-L-8498-17) (December 7, 2017)	N/A
Clayton, Jacqueline	NI	N/A	N/A	Clayton, Jacqueline (2:17-cv-10158) (October 4, 2017)	Clayton, Jacqueline (BER-L0008725-17) (December 11, 2017)	N/A
Collins, Mary	TX	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Collins, Mary (BER-L-8501-17) (December 7, 2017)	N/A
Collins, Sonia	OH	Villegas, Eunice et al. v. Samoff SA, et al. (BC6866617) (December 12, 2017); 2:18-cv-02598	Rice-Linda-et-al-v-Samoff-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Collins, Sonia (BER-L-8507-17) (December 8, 2017)	N/A
Conklin, Bianca	KS	Villegas, Eunice et al. v. Samoff SA, et al. (BC6866617) (December 12, 2017); 2:18-cv-02598	Rice-Linda-et-al-v-Samoff-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Conklin, Bianca (BER-L-8508-17) (December 8, 2017)	N/A
Conway, Ashley	MD	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Conway, Ashley (BER-L-8507-17) (December 8, 2017)	N/A
Crafton, Maxine	MD	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Crafton, Maxine (BER-L-8512-17) (December 8, 2017)	N/A
Creech, Dawn	NV	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Creech, Dawn (BER-L-8515-17) (December 8, 2017)	N/A
Crockett, Christianna	OK	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Crockett, Christianna (BER-L-8517-17) (December 8, 2017)	N/A
Crosby, Vivian	MO	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Crosby, Vivian (BER-L-8520-17) (December 8, 2017)	N/A
Crumblin, Carol	IL	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	N/A	N/A
Daddino, Patricia	NY	N/A	N/A	Daddino, Patricia (2:17-cv-09642) (September 26, 2017)	Daddino, Patricia (BER-L-8703-17) (December 11, 2017)	N/A
Duggs, Lynnell	TX	Villegas, Eunice et al. v. Samoff SA, et al. (BC6866617) (December 12, 2017); 2:18-cv-02598	Rice-Linda-et-al-v-Samoff-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Duggs, Lynnell (BER-L-8509-17) (December 8, 2017)	N/A
Dankins, Yolanda	TX	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Dankins, Yolanda (BER-L-8525-17) (December 8, 2017)	N/A
Dantzler, Sandra	AZ	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Dantzler, Sandra (BER-L-8530-17) (December 8, 2017)	N/A
Davenport, Mary	TX	Brown, Renisha et al. v. Samoff SA, et al. (BC6866740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Samoff-SA-et-al- (2017-L-012694)-(December-13-2017)	N/A	Davenport, Mary (BER-L-8532-17) (December 8, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Davis, Dorothy	DC	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Davis, Dorothy (BER-L-8635-17) (December 8, 2017)	N/A
Davis, Jennifer	GA	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Davis, Jennifer (BER-L-8637-17) (December 8, 2017)	N/A
Davis, Luwanda	CA	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	N/A	N/A	N/A	N/A
Davis, Regina	MD	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Davis, Regina (BER-L-8639-17) (December 8, 2017)	N/A
Davis, Ruby	GA	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Davis, Ruby (BER-L-8642-17) (December 8, 2017)	N/A
Pam, Delilah	GA	Shajahan, Samia et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia-et-al-v-Sanofi-SA-et-al- (2017-L-012697) (December-13-2017)	Pam, Delilah (2:17-cv-10003) (October 3, 2017)	Pam, Delilah (BER-L-008585-17) (December 8, 2017)	N/A
Dixon, Charmaine	SC	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Dixon, Charmaine (BER-L-8644-17) (December 8, 2017)	N/A
Dixon, Dorothy	TX	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Dixon, Dorothy (BER-L-8647-17) (December 8, 2017)	N/A
Dixon, Selma	OH	Brown, Renisha et al. v. Sanofi SA, et al. (BC686740) (December 12, 2017); 2:18-cv-02599	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Dixon, Selma (BER-L-8648-17) (December 8, 2017)	N/A
Dougan, Frances	TX	N/A	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Dougan, Frances (BER-L-8613-17) (December 8, 2017)	N/A
Dowd, Gloria	NJ	N/A	N/A	Dowd, Gloria (2:18-cv-01445) (February 12, 2018)	Dowd, Gloria (BER-L-008732-17) (December 11, 2017)	N/A
Dupree, Phyllis	NJ	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	Dupree, Phyllis (BER-L-8649-17) (December 8, 2017)	N/A
Dwolakowski, Madeline	TX	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Rise-Linda-et-al-v-Sanofi-SA-et-al- (2017-L-012703) (December-13-2017)	N/A	Dwolakowski, Madeline (BER-L-8510-17) (December 8, 2017)	N/A
Edwards, Jennifer	MIN	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Edwards, Jennifer (BER-L-8651-17) (December 8, 2017)	N/A
Enwright, Georgette	SC	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Enwright, Georgette (BER-L-8651-17) (December 8, 2017)	N/A
Estes, Carolyn	AZ	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Estes, Carolyn (BER-L-8653-17) (December 8, 2017)	N/A
Farrington, Erma	NC	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Farrington, Erma (BER-L-8655-17) (December 8, 2017)	N/A
Faulkner, Mary	GA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Anderson-Virgie-et-al-v-Sanofi-SA-et-al- (2017-L-012694) (December-13-2017)	N/A	Faulkner, Mary (BER-L-8657-17) (December 8, 2017)	N/A
Fletcher, Arlene	NJ	N/A	N/A	Fletcher, Arlene (2:18-cv-01757) (February 12, 2018)	Fletcher, Arlene (BER-L-008235-17) (December 11, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Foster, Martha	AK	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Anderson, Virginia-et-al-v-Sanofi-SA-et-al-(2017-L-012694)-(December-13-2017)	N/A	Foster, Martha (BER-L-8658-17) (December 8, 2017)	N/A
Fox, Dolletha	CA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	N/A	N/A
Fraser, Xiomara	NJ	N/A	N/A	Fraser, Xiomara (2:17-cv-05854 (January 3, 2017))	Fraser, Xiomara (BER-L-8631-17) (December 8, 2017)	N/A
Freeman, Adell	NJ	N/A	N/A	Freeman, Adell (2:18-cv-00691) (June 22, 2016)	Freeman, Adell (BER-L-8737-17) (December 11, 2017)	N/A
Fridia, Audrey	TX	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Fridia, Audrey (BER-L-8660-17) (December 8, 2017)	N/A
Fullmore, Linda	GA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Fullmore, Linda (BER-L-8661-17) (December 8, 2017)	N/A
Garza, Miliki	TX	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Garza, Miliki (BER-L-8663-17) (December 8, 2017)	N/A
Gerber, Jeanie	WV	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Gerber, Jeanie (BER-L-8664-17) (December 8, 2017)	N/A
Gervin, Pamela	OH	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Gervin, Pamela (BER-L-8666-17) (December 8, 2017)	N/A
Gibbs, Verhavia	CA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	N/A	N/A
Gibson, Ramona	CA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	N/A	N/A
Gill, Phyllis	FL	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Gill, Phyllis (BER-L-8667-17) (December 8, 2017)	N/A
Gilyard, Karen	GA	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02598	Rice-Linda-et-al-v-Sanofi-SA-et-al-(2017-L-012703)-(December-13-2017)	N/A	Gilyard, Karen (BER-L-8511-17) (December 8, 2017)	N/A
Givens, Shanna	NJ	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	Givens, Shanna (BER-L-8669-17) (December 8, 2017)	N/A
Gore, Sallie	SC	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Gore, Sallie (BER-L-8670-17) (December 8, 2017)	N/A
Gorman, Nicole	MO	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02598	Rice-Linda-et-al-v-Sanofi-SA-et-al-(2017-L-012703)-(December-13-2017)	N/A	Gorman, Nicole (BER-L-8513-17) (December 8, 2017)	N/A
Grant, Shelby	SC	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Grant, Shelby (BER-L-8671-17) (December 8, 2017)	N/A
Graves, Dawn	MD	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02598	Rice-Linda-et-al-v-Sanofi-SA-et-al-(2017-L-012703)-(December-13-2017)	N/A	Graves, Dawn (BER-L-8514-17) (December 8, 2017)	N/A
Green, Amelia	IL	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	N/A	N/A
Greer, Robyn	OK	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Greer, Robyn (BER-L-8672-17) (December 8, 2017)	N/A
Gunn, Charlotte	OH	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Gunn, Charlotte (BER-L-8673-17) (December 8, 2017)	N/A
Gurney, Tanya	FL	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Gurney, Tanya (BER-L-8674-17) (December 8, 2017)	N/A
Hadley, Dorcille	TX	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Hadley, Dorcille (BER-L-8675-17) (December 8, 2017)	N/A
Hammer, Glenda	MS	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al-v-Sanofi-SA-et-al-(2017-L-012697)-(December-13-2017)	N/A	Hammer, Glenda (BER-L-8344-17) (December 7, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Harcourt, Beverly	IA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Harcourt, Beverly (BER-L-8347-17) (December 7, 2017)	N/A
Hawkins, Betty	MD	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Hawkins, Betty (BER-L-8349-17) (December 7, 2017)	N/A
Hearne, Nancy	LA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Hearne, Nancy (BER-L-8351-17) (December 7, 2017)	N/A
Hevener, Adella	CA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	N/A	N/A
Hicks, Lilly	IL	N/A	Green, Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	N/A	N/A
Hilton, Jill	NJ	N/A	N/A	Hilton, Jill (2:17-cv-15360) (December 7, 2017)	Hilton, Jill (BER-L-8628-17) (December 8, 2017)	N/A
Holloway, Movell	SC	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Holloway, Movell (BER-L-8358-17) (December 7, 2017)	N/A
Hosney, Bendetta	TX	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Hosney, Bendetta (BER-L-8362-17) (December 7, 2017)	N/A
Hudgon, Marleen	NJ	N/A	N/A	Hudgon, Marleen (2:18-cv-01335) (February 8, 2018)	Hudgon, Marleen (BER-L-008738-17) (December 11, 2017)	N/A
Hunt-Blairford, Marjorie	TX	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Ries-Linda-et-al.-v.-Sanofi-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Hunt-Blairford, Marjorie (BER-L-8526-17) (December 8, 2017)	N/A
Jackson, Annie	MS	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Jackson, Annie (BER-L-8356-17) (December 7, 2017)	N/A
Jackson, Peggy	MS	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Jackson, Peggy (BER-L-8380-17) (December 7, 2017)	N/A
Jackson, Wanda	TN	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Jackson, Wanda (BER-L-8382-17) (December 7, 2017)	N/A
Jackson-Fortune, Gwendolyn	SC	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Ries-Linda-et-al.-v.-Sanofi-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Jackson-Fortune, Gwendolyn (BER-L-8516-17) (December 8, 2017)	N/A
Jacobs, Anita	MD	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Jacobs, Anita (BER-L-8384-17) (December 7, 2017)	N/A
Jefferson Thrower, Arlene	CA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	N/A	N/A
Johnson, Beverly	TN	N/A	N/A	Johnson, Beverly (2:16-cv-17074) (December 11, 2016)	Johnson, Beverly (BER-L-008387-17) (December 7, 2017)	N/A
Johnson, Cassandra	GA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Johnson, Cassandra (BER-L-8389-17) (December 7, 2017)	N/A
Johnson, Lenora	GA	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Ries-Linda-et-al.-v.-Sanofi-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Johnson, Lenora (BER-L-8519-17) (December 8, 2017)	N/A
Johnson, Roxann	CO	N/A	N/A	Johnson, Roxann (2:17-cv-12544) (November 15, 2017)	Johnson, Roxann (BER-L-8756-17) (December 12, 2017) (Napoli Shtolnik to file motion to be relieved as counsel)	N/A
Johnson, Tanya	MD	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Johnson, Tanya (BER-L-8394-17) (December 7, 2017)	N/A
Jolla, Deborah	AZ	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Jolla, Deborah (BER-L-8402-17) (December 7, 2017)	N/A
Jones, Lillie	IN	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697)-(December-13-2017)	N/A	Jones, Lillie (BER-L-8406-17) (December 7, 2017)	N/A
Jones, Linda	PA	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Ries-Linda-et-al.-v.-Sanofi-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Jones, Linda (BER-L-8520-17) (December 8, 2017)	N/A
Jordan-Steele, Tracy	OH	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Ries-Linda-et-al.-v.-Sanofi-SA-et-al- (2017-L-012703)-(December-13-2017)	N/A	Jordan-Steele, Tracy (BER-L-8521-17) (December 8, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Kelly, Gloria	FL	N/A	N/A	N/A	Kelly, Gloria (BER-L-8426-17) (December 7, 2017)	Kelly, Gloria (N17C-1-194) (November 20, 2017)
Kemp, Cledeil	TX	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	Kemp, Cledeil (BER-L-8428-17) (December 7, 2017)	N/A
Kochianin, Karine	NJ	N/A	N/A	N/A	Kochianin, Karine (BER-L-3707-17) (December 11, 2017) (DISMISS); Kochianin, Karine (BER-L-8711-17) (December 11, 2017)	N/A
Lackey, Marie	CA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	N/A	N/A
Lamb, Angela	FL	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	Lamb, Angela (BER-L-8467-17) (December 7, 2017)	N/A
Lance, Gwen	NC	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	Lance, Gwen (BER-L-8470-17) (December 7, 2017)	N/A
Lands, Margrite	NJ	N/A	N/A	Lands, Margrite (2:17-cv-08330) (August 27, 2017)	Lands, Margrite (BER-L-008740-17) (December 11, 2017)	N/A
Lench, Mary	IL	N/A	Green, Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	N/A	N/A
Lester, Racine	OH	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	Lester, Racine (BER-L-8474-17) (December 7, 2017)	N/A
Love, Carmelia	IL	N/A	Green, Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	N/A	N/A
Maxwell, Shannel	CA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	N/A	N/A
McClinton, Kelly	NJ	N/A	N/A	McClinton, Kelly (2:17-cv-10157) (October 4, 2017)	McClinton, Kelly (BER-L-8743-17) (December 11, 2017)	N/A
McClinton, Felicia	MS	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	McClinton, Felicia (BER-L-8495-17) (December 7, 2017) (FF40)	N/A
McCombs, Rebecca	IL	N/A	Green, Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	N/A	N/A
Medler, Iva	CA	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	N/A	N/A	N/A	N/A
Meece, Brittany	OH	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	Meece, Brittany (BER-L-8497-17) (December 7, 2017)	N/A
Mendoza, Kimberly	CA	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	N/A	N/A	N/A	N/A
Meyers, Deborah	CO	Gibson, Ramona et al. v. Sanofi SA, et al. (BC686616) (December 12, 2017); 2:18-cv-02601	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	Meyers, Deborah (BER-L-8540-17) (December 8, 2017)	N/A
Mirabella, Lilian	SC	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	Mirabella, Lilian (BER-L-8523-17) (December 8, 2017)	N/A
Mitchell, Cherrita	IL	N/A	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	N/A	N/A
Moore, Sheila	SC	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	Moore, Sheila (BER-L-8543-17) (December 8, 2017)	N/A
Morgan, Gayla	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Morris, Sylvia	WI	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	Morris, Sylvia (BER-L-8546-17) (December 8, 2017)	N/A
Mosley, Evelyn	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A

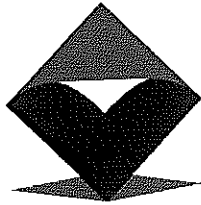
Plaintiff	State of Residency	California State Court Case (Date Filed): MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Mossman, Linda	TX	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697) (December 13, 2017)	N/A	Mossman, Linda (BER-L-8598-17) (December 8, 2017)	N/A
Mundell, Martha	MD	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697) (December 13, 2017)	N/A	Mundell, Martha (BER-L-8590-17) (December 8, 2017)	N/A
Namakhia, Anne	TN	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697) (December 13, 2017)	N/A	Namakhia, Anne (BER-L-8555-17) (December 8, 2017)	N/A
Nava, Lori	TX	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697) (December 13, 2017)	Nava, Lori (2:17-cv-16185) (December 9, 2017)	Nava, Lori (BER-L-8556-17) (December 8, 2017)	N/A
Nelson, Brenda	NJ	N/A	N/A	Nelson, Brenda (2:18-cv-00713) (July 20, 2016)	Nelson, Brenda (BER-L-8744-17) (December 11, 2017)	N/A
Nelson, Kelly	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Nichols, Patricia	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Owens, Sheila	TX	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697) (December 13, 2017)	N/A	Owens, Sheila (BER-L-8592-17) (December 8, 2017)	N/A
Papocchia, Mary	IL	N/A	Green, Amelia et al. v. Sanofi SA, et al. (2017-L-012697) (December 13, 2017)	N/A	N/A	N/A
Patterson, Denise	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Pavkovich, Charlene	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Peachiet, Bernice	MS	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697) (December 13, 2017)	N/A	Peachiet, Bernice (BER-L-8589-17) (December 8, 2017)	N/A
PHELPS, Carla	AL	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Green-Amelia-et-al.-v.-Sanofi-SA-et-al- (2017-L-012697) (December 13, 2017)	N/A	PHELPS, Carla (BER-L-8595-17) (December 8, 2017)	N/A
Plinkney, Roslynn	TX	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al.-v.-Sanofi-SA-et-al- (2017-L-012699) (December 13, 2017)	N/A	Plinkney, Roslynn (BER-L-8598-17) (December 8, 2017)	N/A
Potter, Joyce	NE	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al.-v.-Sanofi-SA-et-al- (2017-L-012699) (December 13, 2017)	N/A	Potter, Joyce (BER-L-8599-17) (December 8, 2017)	N/A
Powell, Geneva	GA	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	Powell, Geneva (BER-L-008525-17) (December 8, 2017)	N/A
Prug, Theresa	NY	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al.-v.-Sanofi-SA-et-al- (2017-L-012699) (December 13, 2017)	N/A	Prug, Theresa (BER-L-8346-17) (December 7, 2017)	N/A
Priddenow, Beverly	WI	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	Priddenow, Beverly (BER-L-8536-17) (December 8, 2017)	N/A
Pugh, Savannah	IL	N/A	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	N/A	N/A
Pumell, Deborah	NJ	N/A	N/A	Pumell, Deborah (2:18-cv-01395) (February 9, 2018)	Pumell, Deborah (BER-L-8636-17) (December 8, 2017) (DISMISS); Pumell, Deborah (BER-L-8757-17) (December 12, 2017) (Cohen, Pucella & Rofis)	N/A
Reeves, Patsy	GA	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	N/A	N/A
Rice, Linda	IL	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	N/A	N/A
Ricks, Delilah	IL	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	N/A	N/A
Rivers, Sheila	SC	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al.-v.-Sanofi-SA-et-al- (2017-L-012699) (December 13, 2017)	N/A	Rivers, Sheila (BER-L-8363-17) (December 7, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Roberts, Lillian	NC	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Roberts, Lillian (BER-L-8364-17) (December 7, 2017)	N/A
Robinson, Brenda	GA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Robinson, Brenda (BER-L-8370-17) (December 7, 2017)	N/A
Robinson, Janette	MS	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Robinson, Janette (BER-L-8372-17) (December 7, 2017)	N/A
Robinson, Tanisha	FL	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Robinson, Tanisha (BER-L-8373-17) (December 7, 2017)	N/A
Rodgers, Cynthia	MO	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Rodgers, Cynthia (BER-L-8371-17) (December 8, 2017)	N/A
Ruby, Susan	CO	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Ruby, Susan (BER-L-8393-17) (December 7, 2017)	N/A
Ruggieri, Winifred	FL	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Ruggieri, Winifred (BER-L-8395-17) (December 7, 2017)	N/A
Rupp, Paula	KS	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Rupp, Paula (BER-L-8398-17) (December 7, 2017)	N/A
Sanchez, Vicki	NJ	N/A	N/A	Sanchez, Vicki (2:18-cv-06698) (June 22, 2016)	Sanchez, Vicki (BER-L-8746-17) (December 11, 2017)	N/A
Sanders, Terri	NJ	N/A	N/A	Sanders, Terri (2:17-cv-16703) (December 11, 2017)	Sanders, Terri (BER-L-8407-17) (December 7, 2017) (Napoli - DISMISS); Sanders, Terri (BER-L-8627-17) (December 8, 2017) (Robina Kaplan)	N/A
Schofield, Valencia	GA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Schofield, Valencia (BER-L-8419-17) (December 7, 2017)	N/A
Scott, Carole	PA	N/A	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	Scott, Carole (BER-L-8523-17) (December 8, 2017)	N/A
Scott, Theresa	NE	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	Scott, Theresa (BER-L-8415-17) (December 7, 2017)	N/A
Seabrooks, Valerie	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	Seabrooks, Valerie (2:17-cv-07877) (August 16, 2017)	N/A	N/A
Seldon, Gracie	MS	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	Seldon, Gracie (BER-L-8419-17) (December 7, 2017)	N/A
Shajahan, Saima	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Shirley, Joan	MT	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	Shirley, Joan (BER-L-8423-17) (December 7, 2017)	N/A
Shorley, Barbara	MO	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	Shorley, Barbara (BER-L-8431-17) (December 7, 2017)	N/A
Stular, Frances	SC	N/A	N/A	N/A	Stular, Frances (BER-L-8619-17) (December 8, 2017)	N/A
Singh, Sylvia	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Singletary, Claudine	MD	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	Singletary, Claudine (BER-L-8434-17) (December 7, 2017)	N/A
Smith, Darleta	IL	N/A	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699)-(December-13-2017)	N/A	N/A	N/A
Smith, Jacqueline	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Smith, Sharon	CT	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	Smith, Sharon (BER-L-8529-17) (December 8, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Snowden, Jacqueline	PA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Snowden, Jacqueline (BER-L-8417-17) (December 7, 2017)	N/A
Strepco, Alisa	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Stewart, Valerie	MS	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	Stewart, Valerie (2:17-cv-14587) (December 5, 2017)	Stewart, Valerie (BER-L-8452-17) (December 7, 2017)	N/A
Tate, Sharon	CA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	N/A	N/A	N/A	N/A
Tatum, Deborah	WI	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Tatum, Deborah (BER-L-8455-17) (December 7, 2017)	N/A
Taylor, Barbara	NC	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Taylor, Barbara (BER-L-8457-17) (December 7, 2017)	N/A
Taylor, Ericile	IL	N/A	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	N/A	N/A
Thomas, Antonette	OH	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Thomas, Antonette (BER-L-8461-17) (December 7, 2017)	N/A
Thomas, Mary	TX	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Thomas, Mary (BER-L-8462-17) (December 7, 2017)	N/A
Thornion, Mavis	PA	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Thornion, Mavis (BER-L-8465-17) (December 7, 2017)	N/A
Tidwell, Alice	IN	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Tidwell, Alice (BER-L-8538-17) (December 8, 2017)	N/A
Tillman, Betty	MS	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Tillman, Betty (BER-L-8539-17) (December 8, 2017)	N/A
Torres, Lisa	NJ	N/A	N/A	Torres, Lisa (2:18-cv-00649) (January 22, 2018)	Torres, Lisa (BER-L-808748-17) (December 11, 2017)	N/A
Tucker, Betty	UT	Shajahan, Saima et al. v. Sanofi SA, et al. (BC686723) (December 12, 2017); 2:18-cv-02600	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Tucker, Betty (BER-L-8541-17) (December 8, 2017)	N/A
Villegas, Eunice	CA	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	N/A	N/A	N/A	N/A
Vincent, Jessica	AR	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	Vincent, Jessica (BER-L-8532-17) (December 8, 2017)	N/A
Virts, Roberta	MD	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Virts, Roberta (BER-L-8569-17) (December 8, 2017)	N/A
Ward, Brenda	OH	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Ward, Brenda (BER-L-8574-17) (December 8, 2017)	N/A
Ward, Helen	FL	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Ward, Helen (BER-L-8576-17) (December 8, 2017)	N/A
Washington, Lejune	NY	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Washington, Lejune (BER-L-8580-17) (December 8, 2017)	N/A
Washington, Sharon	TX	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	Washington, Sharon (BER-L-8513-17) (December 8, 2017)	N/A
Watson, Sharon	NY	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Watson, Sharon (BER-L-8583-17) (December 8, 2017)	N/A
Webster, Bonita	WI	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	Webster, Bonita (BER-L-8584-17) (December 8, 2017)	N/A
Weems, Vicky	OK	N/A	Rice, Linda et al. v. Sanofi SA, et al. (2017-L-012703) (December 13, 2017)	N/A	Weems, Vicky (BER-L-8535-17) (December 8, 2017)	N/A
White, Jean	FL	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh-Savannah-et-al-v-Sanofi-SA-et-al- (2017-L-012699) (December-13-2017)	N/A	White, Jean (BER-L-8586-17) (December 8, 2017)	N/A

Plaintiff	State of Residency	California State Court Case (Date Filed); MDL Case	Illinois State Court Case (Date Filed)	MDL Case (Date Filed)	New Jersey State Court Case (Date Filed)	Delaware State Court Case (Date Filed)
Wildert, Debra	FL	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012699) (December 13, 2017)	N/A	Wildert, Debra (BER-L-8590-17) (December 8, 2017)	N/A
Williams, Dianne	MO	Villegas, Eunice et al. v. Sanofi SA, et al. (BC686617) (December 12, 2017); 2:18-cv-02598	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012699) (December 13, 2017)	N/A	Williams, Dianne (BER-L-8592-17) (December 8, 2017)	N/A
Williams, Mammie	IL	N/A	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012699) (December 13, 2017)	N/A	N/A	N/A
Williams, Renee	DC	N/A	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012699) (December 13, 2017)	N/A	Williams, Renee (BER-L-8593-17) (December 8, 2017)	N/A
Williams, Ruby	AR	N/A	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012699) (December 13, 2017)	N/A	Williams, Ruby (BER-L-8594-17) (December 8, 2017)	N/A
Young, Shelia	MO	N/A	Pugh, Savannah et al. v. Sanofi SA, et al. (2017-L-012699) (December 13, 2017)	N/A	Young, Shelia (BER-L-008386-17) (December 7, 2017)	N/A

EXHIBIT 4



**NAPOLI
SHKOLNIK LLC**
ATTORNEYS AT LAW

HUNTER J. SHKOLNIK, PARTNER
Hunter@NapoliLaw.com

May 2, 2018

VIA: CERTIFIED FIRST CLASS MAIL

The Honorable Glenn A. Grant, J.A. D.
Acting Administrative Director of the Courts
Attention: MCL Comments – Taxotere (Docetaxel) Litigation
Administrative Director of the Courts
Hughes Justice Complex
25 Market Street
Trenton, New Jersey 08625

RE: *Napoli Shkolnik New Jersey Taxotere Cases*

Dear Honorable Glenn A. Grant:

On March 13, 2018, on behalf of all plaintiffs, Robins Kaplan LLP filed an Application pursuant to Rule 4:38A to Designate the Taxotere (Docetaxel) Cases a Multicounty Litigation for Centralized Management (“Application”). Napoli Shkolnik represents plaintiffs listed on the Schedule of Actions (“Exhibit A”) which are subject to the (pending) MCL Taxotere Litigation Application.

The plaintiffs delineated in Exhibit A were filed in Bergen County and subsequently transferred to Middlesex County. All Bergen County index numbers were closed out. However, new index numbers have not been issued at this time. I write to update the Court that the plaintiffs listed on Exhibit A will be seeking dismissals without prejudice once index numbers are assigned.

Should the Court require anything further, counsel stands ready to serve the Court.

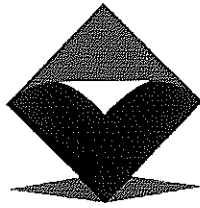
Respectfully Submitted,

Hunter J. Shkolnik, Esq.
New Jersey Bar No. 41531985

Encl.

NAPOLILAW.COM

400 BROADHOLLOW ROAD, SUITE 305, MELVILLE, NY 11747 | P:(212) 397-1000



**NAPOLI
SHKOLNIK LLC**
ATTORNEYS AT LAW

cc: Hon. James F. Hyland, J.S.C. (*via overnight delivery*)
Hon. Jamie D. Happs, P.J.Cv. (*via overnight delivery*)
Ian Ratzlaff, Civil Division Manager, Middlesex Vicinage – Civil Division (*via overnight delivery*)
All known Plaintiffs' Counsel subject to the Application (*via electronic mail*)
Counsel for Defendants Sanofi-Aventis U.S. LLC and Sanofi U.S. Services Inc. (*via electronic mail*)
Counsel for Defendant Sandoz, Inc. (*via electronic mail*)
Counsel for Defendants Hospira, Inc., Hospira Worldwide, LLC, formerly doing business as Hospira
Worldwide, Inc., and Pfizer Inc. (*via electronic mail*)
Counsel for Defendant Accord Healthcare Inc. (*via electronic mail*)

Exhibit A - SCHEDULE OF ACTIONS

PLAINTIFF (Last Name, First Name)	BERGEN COUNTY DOCKET NO.	FILED DATE	COUNTY CURRENTLY PENDING
Abrams, Linda	BER-L-8388-17	December 7, 2017	Middlesex
Acosta-Dominguez, Delma	BER-L-8473-17	December 7, 2017	Middlesex
Agnese, Barbara	BER-L-8700-17	December 7, 2017	Middlesex
Alawar, Ferial	BER-L-8403-17	December 7, 2017	Middlesex
Anderson, Cathy	BER-L-8403-17	December 7, 2017	Middlesex
Anderson, Jerry	BER-L-8410-17	December 7, 2017	Middlesex
Anderson, Loretta	BER-L-8414-17	December 7, 2017	Middlesex
Anderson, Rose	BER-L-8417-17	December 7, 2017	Middlesex
Belin, Carolyn	BER-L-8438-17	December 7, 2017	Middlesex
Benjamin, Harriet	BER-L-8443-17	December 7, 2017	Middlesex
Bernett, Sally	BER-L-8456-17	December 7, 2017	Middlesex
Bing, Marilyn	BER-L-8481-17	December 7, 2017	Middlesex
Bonb, Judy	BER-L-8464-17	December 7, 2017	Middlesex
Borovic, Diane	BER-L-8493-17	December 7, 2017	Middlesex
Bounds, Geneva	BER-L-8466-17	December 7, 2017	Middlesex
Boyland, Kathleen	BER-L-8701-17	December 11, 2017	Middlesex
Bracy, Mary	BER-L-008716-17	December 11, 2017	Middlesex
Breaux, Beverly	BER-L-8468-17	December 7, 2017	Middlesex
Broadie, Linda	BER-L-8369-17	December 7, 2017	Middlesex
Buckley, Della	BER-L-8374-17	December 7, 2017	Middlesex
Bunche, Helen	BER-L-8375-17	December 7, 2017	Middlesex
Burnham, Rose	BER-L-8502-17	December 7, 2017	Middlesex
Campbell, Cheryl	BER-L-8503-17	December 7, 2017	Middlesex
Carroll, Francis	BER-L-8397-17	December 7, 2017	Middlesex
Carroll, Linda	BER-L-8404-17	December 7, 2017	Middlesex
Carson, Clara	BER-L-8412-17	December 7, 2017	Middlesex
Carter, Brenda	BER-L-8425-17	December 7, 2017	Middlesex
Carter, Mary	BER-L-8433-17	December 7, 2017	Middlesex
Carter, Paulette	BER-L-8439-17	December 7, 2017	Middlesex
Chambers, Juanita	BER-L-8477-17	December 7, 2017	Middlesex
Chapman, Cynthia	BER-L-8482-17	December 7, 2017	Middlesex
Charette, Gloria	BER-L-8487-17	December 7, 2017	Middlesex
Charleston, Mary	BER-L-8496-17	December 7, 2017	Middlesex
Cheves, Cecilia	BER-L-8505-17	December 7, 2017	Middlesex
Clark, Antoinette	BER-L-8506-17	December 8, 2017	Middlesex
Clark, Melody	BER-L-8498-17	December 7, 2017	Middlesex
Clayton, Jacqueline	BER-L-8726-17	December 11, 2017	Middlesex
Collins, Mary	BER-L-8501-17	December 7, 2017	Middlesex
Collins, Sonia	BER-L-8507-17	December 8, 2017	Middlesex
Conklin, Bianca	BER-L-8508-17	December 8, 2017	Middlesex
Conway, Ashley	BER-L-8607-17	December 8, 2017	Middlesex
Crafton, Maxine	BER-L-8612-17	December 8, 2017	Middlesex
Creech, Dawn	BER-L-8615-17	December 8, 2017	Middlesex
Crockett, Christianna	BER-L-8617-17	December 8, 2017	Middlesex

Exhibit A - SCHEDULE OF ACTIONS

PLAINTIFF (Last Name, First Name)	BERGEN COUNTY DOCKET NO.	FILED DATE	COUNTY CURRENTLY PENDING
Crosby, Vivian	BER-L-8620-17	December 8, 2017	Middlesex
Daddino, Patricia	BER-L-8703-17	December 11, 2017	Middlesex
Daggs, Lynell	BER-L-8509-17	December 8, 2017	Middlesex
Dankins, Yolanda	BER-L-8625-17	December 8, 2017	Middlesex
Dantzler, Sandra	BER-L-8630-17	December 8, 2017	Middlesex
Davenport, Mary	BER-L-8632-17	December 8, 2017	Middlesex
Davis, Dorothy	BER-L-8635-17	December 8, 2017	Middlesex
Davis, Jennifer	BER-L-8637-17	December 8, 2017	Middlesex
Davis, Regina	BER-L-8639-17	December 8, 2017	Middlesex
Davis, Ruby	BER-L-8642-17	December 8, 2017	Middlesex
Pam, Delilah	BER-L-008585-17	December 8, 2017	Middlesex
Dixon, Charmaine	BER-L-8646-17	December 8, 2017	Middlesex
Dixon, Dorothy	BER-L-8647-17	December 8, 2017	Middlesex
Dixon, Selina	BER-L-8648-17	December 8, 2017	Middlesex
Dowd, Gloria	BER-L-008732-17	December 11, 2017	Middlesex
Dupree, Phyllis	BER-L-8649-17	December 8, 2017	Middlesex
Dwolakowski, Madeleine	BER-L-8510-17	December 8, 2017	Middlesex
Edwards, Jennifer	BER-L-8650-17	December 8, 2017	Middlesex
Enwright, Georgette	BER-L-8651-17	December 8, 2017	Middlesex
Estes, Carolyn	BER-L-8653-17	December 8, 2017	Middlesex
Farrington, Erma	BER-L-8655-17	December 8, 2017	Middlesex
Faulkner, Mary	BER-L-8657-17	December 8, 2017	Middlesex
Fletcher, Arlene	BER-L-008735-17	December 11, 2017	Middlesex
Foster, Martha	BER-L-8658-17	December 8, 2017	Middlesex
Fridia, Audrey	BER-L-8660-17	December 8, 2017	Middlesex
Fullmore, Linda	BER-L-8661-17	December 8, 2017	Middlesex
Garza, Mikki	BER-L-8663-17	December 8, 2017	Middlesex
Gerber, Jeannie	BER-L-8664-17	December 8, 2017	Middlesex
Gervin, Pamela	BER-L-8666-17	December 8, 2017	Middlesex
Gill, Phyllis	BER-L-8667-17	December 8, 2017	Middlesex
Gilyard, Karen	BER-L-8511-17	December 8, 2017	Middlesex
Givens, Shanna	BER-L-8669-17	December 8, 2017	Middlesex
Gore, Sallie	BER-L-8670-17	December 8, 2017	Middlesex
Gorman, Nicole	BER-L-8513-17	December 8, 2017	Middlesex
Grant, Shelby	BER-L-8671-17	December 8, 2017	Middlesex
Graves, Dawn	BER-L-8514-17	December 8, 2017	Middlesex
Greer, Robyn	BER-L-8672-17	December 8, 2017	Middlesex
Gunn, Charlotte	BER-L-8673-17	December 8, 2017	Middlesex
Gurney, Tanya	BER-L-8674-17	December 8, 2017	Middlesex
Hadley, Dorcille	BER-L-8675-17	December 8, 2017	Middlesex
Hamner, Glenda	BER-L-8344-17	December 7, 2017	Middlesex
Harcourt, Beverly	BER-L-8347-17	December 7, 2017	Middlesex
Hawkins, Betty	BER-L-8349-17	December 7, 2017	Middlesex
Hearne, Nancy	BER-L-8351-17	December 7, 2017	Middlesex

Exhibit A - SCHEDULE OF ACTIONS

PLAINTIFF (Last Name, First Name)	BERGEN COUNTY DOCKET NO.	FILED DATE	COUNTY CURRENTLY PENDING
Hilton, Jill	BER-L-8628-17	December 8, 2017	Middlesex
Holloway, Movell	BER-L-8358-17	December 7, 2017	Middlesex
Hosney, Bendetta	BER-L-8362-17	December 7, 2017	Middlesex
Hunt-Bluford, Marjorie	BER-L-8626-17	December 8, 2017	Middlesex
Jackson, Annie	BER-L-8366-17	December 7, 2017	Middlesex
Jackson, Peggy	BER-L-8380-17	December 7, 2017	Middlesex
Jackson, Wanda	BER-L-8382-17	December 7, 2017	Middlesex
Jackson-Fortune, Gwendolyn	BER-L-8518-17	December 8, 2017	Middlesex
Jacobs, Anita	BER-L-8384-17	December 7, 2017	Middlesex
Johnson, Beverly	BER-L-008387-17	December 7, 2017	Middlesex
Johnson, Cassandra	BER-L-8389-17	December 7, 2017	Middlesex
Johnson, Lenora	BER-L-8519-17	December 8, 2017	Middlesex
Johnson, Tanya	BER-L-8394-17	December 7, 2017	Middlesex
Jolla, Deborah	BER-L-8402-17	December 7, 2017	Middlesex
Jones, Lillie	BER-L-8406-17	December 7, 2017	Middlesex
Jones, Linda	BER-L-8520-17	December 8, 2017	Middlesex
Jordan-Steele, Tracy	BER-L-8521-17	December 8, 2017	Middlesex
Kelly, Gloria	BER-L-8426-17	December 7, 2017	Middlesex
Kemp, Cledell	BER-L-8428-17	December 7, 2017	Middlesex
Kocharian, Karine	BER-L-8707-17	December 11, 2017	Middlesex
Lamb, Angela	BER-L-8467-17	December 7, 2017	Middlesex
Lance, Gwen	BER-L-8470-17	December 7, 2017	Middlesex
Lands, Margrite	BER-L-008740-17	December 11, 2017	Middlesex
Lester, Racine	BER-L-8474-17	December 7, 2017	Middlesex
McCallion, Kelly	BER-L-8743-17	December 11, 2017	Middlesex
McClinton, Felicia	BER-L-8495-17	December 7, 2017	Middlesex
Meece, Brittany	BER-L-8497-17	December 7, 2017	Middlesex
Meyers, Deborah	BER-L-8540-17	December 8, 2017	Middlesex
Mirabella, Lillian	BER-L-8523-17	December 8, 2017	Middlesex
Moore, Sheila	BER-L-8543-17	December 8, 2017	Middlesex
Morris, Sylvia	BER-L-8546-17	December 8, 2017	Middlesex
Mossman, Linda	BER-L-8549-17	December 8, 2017	Middlesex
Mundell, Martha	BER-L-8550-17	December 8, 2017	Middlesex
Namishia, Anne	BER-L-8555-17	December 8, 2017	Middlesex
Nava, Lori	BER-L-8556-17	December 8, 2017	Middlesex
Owens, Sheila	BER-L-8582-17	December 8, 2017	Middlesex
Peaches, Bernice	BER-L-8589-17	December 8, 2017	Middlesex
Phelps, Carla	BER-L-8595-17	December 8, 2017	Middlesex
Pinkney, Roslynn	BER-L-8598-17	December 8, 2017	Middlesex
Potter, Joyce	BER-L-8599-17	December 8, 2017	Middlesex
Powell, Geneva	BER-L-008525-17	December 8, 2017	Middlesex
Prag, Theresa	BER-L-8346-17	December 7, 2017	Middlesex
Pribbenow, Beverly	BER-L-8526-17	December 8, 2017	Middlesex
Purnell, Deborah	BER-L-8636-17	December 8, 2017	Middlesex

Exhibit A - SCHEDULE OF ACTIONS

PLAINTIFF (Last Name, First Name)	BERGEN COUNTY DOCKET NO.	FILED DATE	COUNTY CURRENTLY PENDING
Rivers, Sheila	BER-L-8363-17	December 7, 2017	Middlesex
Roberts, Lilian	BER-L-8364-17	December 7, 2017	Middlesex
Robinson, Brenda	BER-L-8370-17	December 7, 2017	Middlesex
Robinson, Janette	BER-L-8372-17	December 7, 2017	Middlesex
Robinson, Taisha	BER-L-8373-17	December 7, 2017	Middlesex
Rodgers, Cynthia	BER-L-8571-17	December 8, 2017	Middlesex
Ruby, Susan	BER-L-8393-17	December 7, 2017	Middlesex
Ruggeri, Winifred	BER-L-8395-17	December 7, 2017	Middlesex
Rupp, Paula	BER-L-8398-17	December 7, 2017	Middlesex
Sanders, Terri	BER-L-8407-17	December 7, 2017	Middlesex
Schofield, Valencia	BER-L-8409-17	December 7, 2017	Middlesex
Scott, Carole	BER-L-8528-17	December 8, 2017	Middlesex
Scott, Theresia	BER-L-8415-17	December 7, 2017	Middlesex
Seldon, Gracie	BER-L-8419-17	December 7, 2017	Middlesex
Shirley, Joan	BER-L-8423-17	December 7, 2017	Middlesex
Shorley, Barbara	BER-L-8431-17	December 7, 2017	Middlesex
Shular, Frances	BER-L-8619-17	December 8, 2017	Middlesex
Singletary, Claudine	BER-L-8434-17	December 7, 2017	Middlesex
Snowden, Jacqueline	BER-L-8447-17	December 7, 2017	Middlesex
Stewart, Valerie	BER-L-8452-17	December 7, 2017	Middlesex
Tatum, Deborah	BER-L-8455-17	December 7, 2017	Middlesex
Taylor, Barbara	BER-L-8457-17	December 7, 2017	Middlesex
Thomas, Antonette	BER-L-8461-17	December 7, 2017	Middlesex
Thomas, Mary	BER-L-8462-17)	December 7, 2017	Middlesex
Thornton, Mavis	BER-L-8465-17	December 7, 2017	Middlesex
Tidwell, Alice	BER-L-8538-17	December 8, 2017	Middlesex
Tillman, Betty	BER-L-8539-17	December 8, 2017	Middlesex
Torres, Lisa	BER-L-008748-17	December 11, 2017	Middlesex
Tucker, Betty	BER-L-8541-17	December 8, 2017	Middlesex
Vincent, Jessica	BER-L-8532-17	December 8, 2017	Middlesex
Virts, Roberta	BER-L-8569-17	December 8, 2017	Middlesex
Ward, Brenda	BER-L-8574-17	December 8, 2017	Middlesex
Ward, Helen	BER-L-8576-17	December 8, 2017	Middlesex
Washington, Lejune	BER-L-8580-17	December 8, 2017	Middlesex
Washington, Sharon	BER-L-8533-17	December 8, 2017	Middlesex
Watson, Sharon	BER-L-8583-17	December 8, 2017	Middlesex
Webster, Bonita	BER-L-8584-17	December 8, 2017	Middlesex
White, Jean	BER-L-8586-17	December 8, 2017	Middlesex
Wilder, Debra	BER-L-8590-17	December 8, 2017	Middlesex
Williams, Dianne	BER-L-8592-17	December 8, 2017	Middlesex
Williams, Renee	BER-L-8593-17	December 8, 2017	Middlesex
Williams, Ruby	BER-L-8594-17	December 8, 2017	Middlesex
Young, Shelia	BER-L-008386-17	December 7, 2017	Middlesex

EXHIBIT 5

SANOFI/TAXOTERE
NJ PLAINTIFFS' COUNTY OF RESIDENCE

County of Residence	Number of Plaintiffs	Venue of Complaint Filing
Atlantic	6	Bergen (5) Camden (1)
Bergen	4	Bergen (4)
Burlington	9	Bergen (9)
Camden	10	Bergen (4) Camden (4) Middlesex (1) Union (1)
Cape May	2	Bergen (2)
Cumberland	2	Bergen (2)
Essex	2	Bergen (2)
Gloucester	3	Bergen (3)
Hudson	5	Bergen (4) Hudson (1)
Mercer	5	Bergen (4) Union (1)
Middlesex	2	Bergen (2)
Monmouth	2	Bergen (2)
Morris	5	Bergen (4) Essex (1)
Ocean	1	Bergen (1)
Passaic	1	Bergen (1)
Salem	1	Bergen (1)
Somerset	2	Bergen (2)
Union	1	Union (1)
Warren	4	Bergen (4)
Unknown (address provided was only NJ – no other specifics)	2	Bergen (1) Middlesex (1)

EXHIBIT 6

This Order was prepared and filed by the Court.

FILED
JAN 05 2018
BONNIE J. MIZDOL, A.J.S.C.

Jo Brown, :
 Plaintiff(s), :
 v. :
 Sanofi U.S. Services, Inc., Sanofi-Avantis :
 U.S. LLC. Sanofi, S.A. and Aventis Pharma :
 S.A., :
 Defendant(s). :

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY
DOCKET NO.: BER-L-8319-17

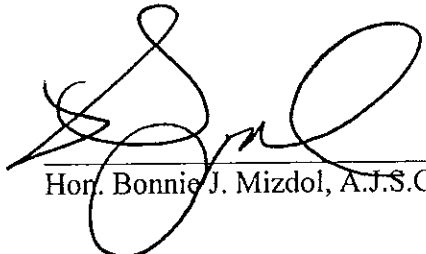
OMNIBUS ORDER

This matter having been brought before the court *sua sponte* by way of electronic filings commencing on December 6, 2017, and this court having determined the attached lawsuits involve actions sounding in products liability against defendants alleging wrongful conduct in connection with design, development, manufacture, testing, packaging, promoting, marketing, distribution, labeling and/or sale of an alleged defective pharmaceutical product known as Taxotere, and the court finding no nexus to the Bergen County vicinage other than the defendants' doing business in this county, as well as in all other counties in New Jersey, and this court further acknowledging that 333 complaints as of December 28, 2017 were filed by various plaintiffs setting forth similar allegations, asserting venue is properly in Bergen County pursuant to R. 4:3-2(b) in that the defendants do business in Bergen County, and this court finding venue requirements of the Rules of Court are designed to place litigation at a location convenient to parties and witnesses, and pursuant to R. 4:3-3(a)(3), and for good cause shown,

IT IS on this 5th day of January, 2018,

ORDERED that

1. The venue in the above matter, and all cases attached hereto and made a part hereof, are hereby transferred from Bergen County to Middlesex County;
2. Any and all future filings against these defendants arising out of the alleged defective product Taxotere shall be filed in Middlesex County, or will be transferred to Middlesex County if filed in Bergen County;
3. Service of this order shall be through eCourts.



 Hon. Bonnie J. Mizdol, A.J.S.C.