

**[PLAINTIFF'S COUNSEL INFORMATION]  
ATTORNEYS FOR PLAINTIFFS**

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**IN THE SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION, ATLANTIC COUNTY**

Plaintiff,	:	
	:	
v.	:	ACCUTANE LITIGATION
	:	
	:	Case Code Number: 271
	:	
<b>HOFFMANN-LA ROCHE INC.;</b>	:	<b>ABBREVIATED SHORT FORM</b>
<b>ROCHE LABORATORIES INC.;</b>	:	<b>COMPLAINT FOR ACCUTANE</b>
<b>HOFFMANN-LA ROCHE LTD.; and</b>	:	<b>LITIGATION</b>
<b>ROCHE HOLDING LTD.,</b>	:	
	:	<b>JURY TRIAL DEMANDED</b>
Defendants.	:	

**ABBREVIATED INDIVIDUAL COMPLAINT FOR ACCUTANE LITIGATION  
AND ADOPTION BY REFERENCE**

1. Plaintiff for his/her claim against the Defendants states and alleges as follows and incorporates by reference the relevant portions of the Master Complaint on file entitled: In Re: Accutane Litigation Case Code Number 271, now pending in the Superior Court of New Jersey, Law Division, Atlantic County before the Honorable Carol E. Higbee, P.J.Cv..

Plaintiff selects and indicates by checking off the appropriate boxes, those claims that are specific to his or her case. Where claims require, pursuant to New Jersey law, specific pleading or case specific facts and individual information, plaintiff shall add and include them herein.

2. Plaintiff, \_\_\_\_\_ (hereinafter referred to as "Plaintiff"), is an individual who resides at \_\_\_\_\_ in the State of \_\_\_\_\_.

2A. Plaintiff suffered the following injury(ies) as a result of ingesting Accutane/Roaccutane/Isotretinoin (specify which one) : \_\_\_\_\_.

2B. Plaintiff brings this action:

\_\_\_\_\_ on behalf of himself or herself

\_\_\_\_\_ as the representative of \_\_\_\_\_.

\_\_\_\_\_ as the parent and natural guardian ad litem of \_\_\_\_\_,

a minor born on \_\_\_\_\_.

\_\_\_\_\_ as Administrator of the Estate of Plaintiff's \_\_\_\_\_

(hereinafter "Decedent", see Letters of Administration annexed hereto as Exhibit A), who died on \_\_\_\_\_.

2C. Plaintiff claims damages as a result of:

\_\_\_\_\_ Personal Injury to himself, herself or the person represented

\_\_\_\_\_ Wrongful Death

\_\_\_\_\_ Survival Action

\_\_\_\_\_ Loss of Consortium (per quod)

\_\_\_\_\_ Loss of Services

\_\_\_\_\_ Economic Loss

3. Plaintiff/Decedent purchased and/or otherwise obtained Accutane/Roaccutane/Isotretinoin (specify which one), which Plaintiff/Decedent ingested from \_\_\_\_\_ to \_\_\_\_\_.

4. Plaintiff's spouse, \_\_\_\_\_, (hereinafter referred to as "Spouse") is an adult individual residing at \_\_\_\_\_ in the State of \_\_\_\_\_ and claims damages as a result of:

\_\_\_\_\_ Loss of Consortium

\_\_\_\_\_ Wrongful Death, date of death \_\_\_\_\_.

5. The following claims asserted in the Master Complaint and the allegations with regard thereto in the Master Complaint are herein adopted by reference:

\_\_\_\_\_ Count I: Product Liability – Defective Design (New Jersey Products Liability Act – N.J.S.A. 2A:58C-1 et seq.)

\_\_\_\_\_ Count II: Product Liability- Failure to Warn (New Jersey Products Liability Act - N.J.S.A. 2A:58C-1 et seq.)

\_\_\_\_\_ Count III: NJ Consumer Fraud Act (N.J.S.A. 56:8-1 et. seq.)

\_\_\_\_\_ Count IV: Breach of Express Warranty

\_\_\_\_\_ Count V: Punitive Damages Under Common Law & Products Liability Act (N.J.S.A. 2A:C-1)

\_\_\_\_\_ Count VI: Wrongful Death

\_\_\_\_\_ Count VII: Survival Action

\_\_\_\_\_ Count VIII: Loss of Consortium/Per Quod

Plaintiff asserts the following additional theories of recovery against Defendants:

\* If you include additional claims against entity(ies) other than the named Defendants, the facts supporting this count must be specifically pled by the plaintiff and the

defendants against who they are alleged must be identified on a separate sheet of paper attached to the Complaint.

\* If you have included any additional theories of recovery, to the extent they require specificity in pleadings, the specific facts and allegations supporting these theories must be pleaded by the plaintiff in a manner complying with the requirements of the New Jersey Rules of Court.

**DEMAND FOR JURY TRIAL**

Demand is hereby made for a trial by jury.

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Plaintiff's Counsel

Dated:

**CERTIFICATION PURSUANT TO RULE 4:5-1**

Plaintiff upon information and belief is not aware of any pending or contemplated action. Further, upon information and belief, she/he is not aware of any other party who should be joined in this action.

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Plaintiff's counsel

Dated:

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:25-4, \_\_\_\_\_, is hereby designated as trial  
counsel in this matter.

\_\_\_\_\_  
Plaintiff's Counsel

Dated:

**CERTIFICATION OF NOTICE**

Pursuant to N.J.S.A., 56:8-20, Plaintiff is mailing a copy of this Complaint and  
Jury Demand to the Office of Attorney General, Cn-006, Trenton, New Jersey, within  
(10) days of the filing of this Complaint and Jury Demand.

\_\_\_\_\_  
Plaintiff's Counsel

Dated: