

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: HAIR RELAXER MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 3060 Master Docket Case No. 1:23-cv-00818 Honorable Mary M. Rowland
Plaintiff(s), v. Defendant(s).	MASTER SHORT-FORM COMPLAINT AND JURY DEMAND Civil Action No.

1. Plaintiff(s)/Injured Party/Decedent (hereinafter, “Plaintiff(s)”) incorporate by reference Plaintiffs’ Master Long Form Complaint in *In Re: Hair Relaxer Marketing, Sales Practices and Products Liability Litigation*, MDL 3060, filed as of May 15, 2023, as Document Number [_____].

2. Plaintiff(s), _____, file(s) this Complaint pursuant to CMO No. 2 and is to be bound by the rights, protections and privileges, and obligations of that CMO and other Orders of the Court. Further, in accordance with CMO No. 2, Plaintiff(s) hereby designate(s) the United States District Court for the _____ as Plaintiff’s designated venue (“Original Venue”). Plaintiff makes this selection based upon one (or more) of the following factors (please check the appropriate box(es)):

- Plaintiff currently resides in _____(City/State);
- Plaintiff purchased and used Defendant(s)’ products in _____(City/State);

___ The Original Venue is a judicial district in which Defendant _____ resides, and all defendants are residents of the State in which the district is located (28 U.S.C. § 1391(b)(1)).

___ The Original Venue is a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, specifically (28 U.S.C. § 1391(b)(2)): _____

___ There is no district in which an action may otherwise be brought under 28 U.S.C. § 1391, and the Original Venue is a judicial district in which Defendant _____ is subject to the Court's personal jurisdiction with respect to this action (28 U.S.C. § 1391(b)(3)).

___ Other reason (please explain): _____

3. For purposes of diversity jurisdiction, Plaintiff is a citizen of _____ (State/Territory).

4. Plaintiff(s) state(s) and incorporate(s) by reference as if set forth fully herein all common allegations contained in paragraphs 1 through 114 of the Master Long Form Complaint.

**CASE SPECIFIC FACTS REGARDING
HAIR RELAXER PRODUCT USE AND INJURIES**

5. Plaintiff began using hair relaxer product(s) on or about the following date: _____.

6. Plaintiff used the following hair relaxer product(s), which Plaintiff contends caused and/or contributed to their injury(ies) and brings claims against the following Defendants:

<input type="checkbox"/> <u>L'Oréal USA, Inc./L'Oréal USA Products, Inc./SoftSheen-Carson LLC</u> <input type="checkbox"/> Dark & Lovely <input type="checkbox"/> Optimum <input type="checkbox"/> Mizani	<input type="checkbox"/> <u>Revlon, Inc./Revlon Consumer Products Corporation / Revlon Group Holdings LLC / Revlon</u> <input type="checkbox"/> Crème of Nature <input type="checkbox"/> Revlon Realistic
<input type="checkbox"/> <u>Strength of Nature, LLC/Godrej SON Holdings</u> <input type="checkbox"/> Motions <input type="checkbox"/> Just for Me <input type="checkbox"/> Soft & Beautiful <input type="checkbox"/> TCB <input type="checkbox"/> TCB Naturals <input type="checkbox"/> Profectiv Mega Growth <input type="checkbox"/> African Pride Dream Kids <input type="checkbox"/> African Pride <input type="checkbox"/> Dr. Miracle's	<input type="checkbox"/> <u>Dabur International Ltd./Dabur International USA Ltd./Namaste Laboratories, LLC/Dermoviva Skin Essentials, Inc.</u> <input type="checkbox"/> ORS Olive Oil
<input type="checkbox"/> <u>AFAM Concept, Inc, d/b/a JF Labs</u> <input type="checkbox"/> Hawaiian Silky	<input type="checkbox"/> <u>Parfums de Coeur, Ltd. d/b/a PDC Brands</u> <input type="checkbox"/> Cantu
<input type="checkbox"/> <u>McBride Research Laboratories, Inc.</u> <input type="checkbox"/> Design Essentials	<input type="checkbox"/> <u>Avlon Industries</u> <input type="checkbox"/> Affirm
<input type="checkbox"/> <u>Beauty Bell Enterprises, LLC d/b/a House of Cheatham / House of Cheatham, LLC</u> <input type="checkbox"/> Africa's Best	<input type="checkbox"/> <u>Luster Products, Inc.</u> <input type="checkbox"/> Pink <input type="checkbox"/> Smooth Touch
<input type="checkbox"/> <u>Sally Beauty Holdings, Inc.</u> <input type="checkbox"/> Silk Elements	

7. Other manufacturer(s)/product(s) used by Plaintiff not identified above: _____

8. Plaintiff's use of Defendant(s) hair relaxer product(s) caused serious injuries and damages including but not limited to the following:

- Uterine Cancer
- Endometrial Cancer
- Ovarian Cancer
- Other injuries and/or additional details (please specify): _____

9. Approximate date(s) of diagnosis (injury(ies)), if applicable at this time, that form(s) the basis of Plaintiff's claim(s): _____

**CAUSES OF ACTION AND THEORIES OF RECOVERY ADOPTED AND
INCORPORATED IN THIS LAWSUIT**

10. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference as if set forth fully herein, the following Causes of Action and the Prayer for Relief within the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060:

- Count I – Negligence and/or Gross Negligence
- Count II – Negligent Misrepresentation
- Count III – Negligence *Per Se*
- Count IV – Strict Liability: Design Defect
- Count V – Strict Liability: Failure to Warn
- Count VI – Breach of Implied Warranty of Merchantability/Fitness for Particular Use

- Count VII – Breach of Express Warranty under state law and the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301 et. seq.
- Count VIII – Fraud/Fraudulent Misrepresentation
- Count IX – Fraudulent Concealment
- Count X – U.S. State and Territory Statutory Consumer Protection and Unfair or Deceptive Trade Practices Claims
- Count XI – Unjust Enrichment
- Count XII – Wrongful Death
- Count XIII – Survival Action
- Count XIV – Loss of Consortium
- Count XV – Punitive Damages
- Other Causes of Action:

11. Consortium Claim(s) (if applicable): The following individual(s) allege(s) damages for loss of consortium:

12. Survival and/or Wrongful Death Claim(s) (if applicable): The following individual(s) allege(s) damages for survival and/or wrongful death:

JURY DEMAND

Plaintiff(s) demand(s) a trial by jury as to all claims in this action.

Dated this the ___ day of _____, 20__.

RESPECTFULLY SUBMITTED
ON BEHALF OF THE PLAINTIFF(S),

Signature

OF COUNSEL: (name)
 (firm)
 (address)
 (phone)
 (email)