

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
By Robert E. Lytle, Esq. (NJ ID# 046331990)
101 Grovers Mill Road, Suite 200
Lawrenceville, N.J. 08648
(609) 275-0400

RECEIVED & FILED
2016 DEC 23 A 10:51
SUPERIOR CIVIL DIV
MIDDLESEX VICINAGE

LEVY KONIGSBERG, LLP
By: Moshe Maimon, Esq. (NJ ID No. 042691986)
101 Grovers Mill Road, Suite 200
Lawrenceville, N.J. 08648
(609) 720-0400

Attorneys for Plaintiffs

STEPHEN LANZO, III and KENDRA
LANZO,

Plaintiffs,

v.

CYPRUS AMAX MINERALS COMPANY,
individually and as
successor-in-interest to
American Talc Company,
Metropolitan Talc Company,
Inc., Charles Mathieu, Inc.,
Resource Processors, Inc. and
Windsor Minerals, Inc.;
CYPRUS MINERAL CO.,
individually and as successor-
in-interest to American Talc
Company, Metropolitan Talc
Company, Inc., Charles
Mathieu, Inc., Resource
Processors, Inc. and Windsor
Minerals, Inc.;
IMERYS TALC AMERICA, INC.,
f/k/a Luzenac America, Inc.,
individually and as
successor-in-interest to
Windsor Minerals, Inc.;
JOHNSON & JOHNSON;
JOHNSON & JOHNSON CONSUMER
COMPANIES, INC.; WHITTAKER
CLARK & DANIELS, INC.,
individually and as successor-
in-interest to American Talc

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO.: MID-L- -16AS

Civil Action - Asbestos
Litigation

MID-L- 7385-16 AS

COMPLAINT, JURY DEMAND, DEMAND
FOR ANSWERS TO STANDARD
INTERROGATORIES AND
DESIGNATION OF TRIAL COUNSEL

Company, Metropolitan Talc
Company, Inc., Charles
Mathieu, Inc., and Resource
Processors, Inc.; John Doe
Corporations 1-50;
John Doe Corporations 51-100,

Defendants.

Plaintiffs, Stephen Lanzo, III and Kendra Lanzo, by way of
complaint against Defendants allege and say:

PARTIES - PLAINTIFFS

1. Plaintiffs, Stephen Lanzo, III and Kendra Lanzo, are husband and wife residing at 11 Glen Road, Verona, NJ 07044.
2. Since his birth in 1972, Plaintiff, Stephen Lanzo, regularly and frequently used and was exposed to asbestos-containing Johnson & Johnson talc powder products, the use of which generated dust and exposed him to respirable asbestos fibers. Stephen Lanzo's exposure to respirable asbestos fiber from asbestos-containing talc products, manufactured, sold and supplied by the defendants (and their predecessors in interest) proximately caused his mesothelioma.
3. As a direct and proximate result of the above exposures, Plaintiff, Stephen Lanzo, III, contracted mesothelioma and has suffered, and continues to suffer, from other various diverse injuries and attendant complications.

PARTIES - DEFENDANTS

4. Defendants, CYPRUS AMAX MINERALS COMPANY, individually and as successor-in-interest to American Talc Company, Metropolitan Talc Company, Inc., Charles Mathieu, Inc., Resource Processors, Inc. and Windsor Minerals, Inc.; CYPRUS MINERAL CO., individually and as successor-in-interest to American Talc Company, Metropolitan Talc Company, Inc., Charles Mathieu, Inc., Resource Processors, Inc. and Windsor Minerals, Inc.; IMERYS TALC AMERICA, INC., f/k/a Luzenac America, Inc., individually and as successor-in-interest to Windsor Minerals, Inc.; JOHNSON & JOHNSON; JOHNSON & JOHNSON CONSUMER COMPANIES, INC.; WHITTAKER CLARK & DANIELS, INC., individually and as successor-in-interest to American Talc Company, Metropolitan Talc Company, Inc., Charles Mathieu, Inc., and Resource Processors, Inc., were manufacturers, suppliers or distributors of talc, including asbestos-containing talc and other finished and unfinished asbestos-containing products to which Plaintiff, Stephen Lanzo, was exposed.

5. John Doe Corporations 1 through 50 are the fictitious names of corporations, partnerships, and/or other business entities whose identities are not presently known, and who mined, milled, manufactured, sold, marketed, and/or removed talc, including asbestos-containing talc, or asbestos-containing products, that Plaintiff, Stephen Lanzo, used or to which he was

exposed.

6. John Doe Corporations 51 through 100 are the fictitious names of corporations, partnerships, and/or other business entities whose identities are not presently known, and who are the alter egos of or are otherwise responsible for the conduct or liability of those who mined, milled, manufactured, sold, marketed, and/or removed talc, including asbestos-containing talc, or asbestos-containing products, that Plaintiff, Stephen Lanzo, used or to which he was exposed.

7. The term "Defendants" refers to all of the entities named above.

FIRST COUNT

8. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 7 as though hereinafter set forth at length.

9. The Defendants conduct and/or have conducted business in New Jersey at all times relevant herein. The Defendants breached their warranties, both express and implied, for fitness of purpose and merchantability.

10. The Defendants are strictly liable in tort.

11. As a direct and proximate result of Defendants' negligence, breach of warranties, both express and implied, and strict liability in tort, the Plaintiff, Stephen Lanzo, contracted mesothelioma and has suffered, and continues to suffer, from other various diverse injuries and attendant

complications.

12. It was foreseeable to the Defendants that the Plaintiff, Stephen Lanzo, and others similarly situated, would be injured as a result of the Defendants' actions and misconduct.

WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

SECOND COUNT

13. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 12 as though hereinafter set forth at length.

14. The Defendants, jointly and severally, marketed an ultra-hazardous product and placed that product in the stream of commerce.

15. As a direct and proximate result of the Defendants' actions, the Plaintiff, Stephen Lanzo, contracted mesothelioma and has suffered, and continues to suffer, from other various diverse injuries and attendant complications.

WHEREFORE, Plaintiffs demand judgment against the

Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

THIRD COUNT

16. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 15 as though hereinafter set forth at length.

17. Defendants' breached their non-delegable duty to warn and negligently supplied defective materials and products without ensuring that the Plaintiff, Stephen Lanzo, was warned about the dangers of asbestos exposure.

18. Defendants' actions prevented Plaintiff, Stephen Lanzo, from educating himself on the dangers of asbestos exposure and from taking action to minimize the risks of exposure in and out of the home.

19. As a direct and proximate result of the Defendants' actions and inaction, the Plaintiff, Stephen Lanzo, contracted mesothelioma and has suffered, and continues to suffer, from other various diverse injuries and attendant complications.

WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;

- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

FOURTH COUNT

20. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 19 as though hereinafter set forth at length.

21. Defendants willfully, wantonly and intentionally conspired, and acted in concert, to withhold information from the Plaintiff, Stephen Lanzo, and the general public concerning the known hazards associated with the use of and exposure to talc, including asbestos-containing talc and asbestos products..

22. Defendants willfully, wantonly and intentionally conspired, and acted in concert, to withhold information from the Plaintiff, Stephen Lanzo, and the general public relating to the fact that asbestos fiber inhalation could be fatal.

23. Defendants willfully, wantonly and intentionally conspired, and acted in concert, to disseminate false product safety information to the Plaintiff, Stephen Lanzo, and the general public.

24. Defendants willfully, wantonly and intentionally conspired, and acted in concert, to prevent the dissemination of information concerning their products' hazards and dangers.

25. Defendants willfully, wantonly and intentionally failed to take appropriate action to minimize the risks of asbestos exposure to the Plaintiff, Stephen Lanzo, and the general public.

26. As a direct and proximate result of Defendants' willful, wanton and intentional acts, Plaintiff, Stephen Lanzo contracted mesothelioma and has suffered, and continues to suffer, from other various diverse injuries and attendant complications.

WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

FIFTH COUNT

(Product Liability Act Claim)

27. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 26 as though hereinafter set forth at length.

28. Defendants are strictly liable to Plaintiffs by reason of the following:

(a) Defendants were engaged in the business of being a miner, miller, designer, manufacturer, producer, processor, seller, supplier, and distributor of its asbestos and asbestos-containing products;

(b) Defendants knew or had reason to know that Plaintiff, Stephen Lanzo, and other persons similarly situated would be ultimate users or consumers of its asbestos and asbestos-containing products or would be exposed to its asbestos and asbestos-containing products;

(c) Defendants sold or otherwise placed its asbestos-containing products into the stream of commerce in a defective condition, unreasonably dangerous to Plaintiff, Stephen Lanzo, and other persons similarly situated;

(d) Throughout the many years that Plaintiff, Stephen Lanzo, and other similarly situated persons were exposed to and used Defendants' asbestos-containing products, said asbestos-containing products reached the users and consumers without substantial change in the condition in which they were sold;

(e) The ordinary and foreseeable use of Defendants' asbestos-containing products constituted a dangerous and ultrahazardous activity and created an unreasonable risk of injury to users and bystanders;

(f) Defendants' asbestos and asbestos-containing products were defective in that they were incapable of being made safe for their ordinary and intended use and purpose due to their defective design, and Defendants failed to give any warnings or instructions, or failed to give adequate or sufficient warnings or instructions about the risks, dangers and harm associated with the use of its asbestos and asbestos-containing products.

29. As a consequence of the defective condition of Defendants' asbestos-containing products and Defendants' failure to warn, Plaintiff, Stephen Lanzo inhaled or ingested asbestos dust and fibers during ordinary and foreseeable use of those asbestos-containing products. Plaintiff, Stephen Lanzo, was caused to suffer the injuries, expenses and losses, including severe pain, suffering, and mental anguish as alleged in prior counts of this Complaint.

WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;

- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

SIXTH COUNT

30. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 29 as though hereinafter set forth at length.

31. Plaintiff, Kendra Lanzo, is the wife of Plaintiff, Stephen Lanzo.

32. Due to the actions of the Defendants, Plaintiff, Kendra Lanzo, was wrongfully deprived of her husband's society, services and consortium.

WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly and severally for:

- a) Compensatory damages;
- b) Punitive damages;
- c) Pre-judgment and post judgment interest;
- d) Costs;
- e) Attorney fees and litigation expenses; and
- f) Such other relief as the Court may deem just and proper.

Plaintiffs hereby incorporate by reference all allegations set forth in the Standard Complaint, as amended, which is contained in the Asbestos Manual. A copy of the Asbestos Manual which contains the Standard Complaint can be obtained from the Middlesex County Mass Tort Clerk or by visiting the following website:

http://www.judiciary.state.nj.us/mass-tort/asbestos/asbestos_amended_std_complaint.pdf

DISCLAIMER OF FEDERAL JURISDICTION

Plaintiffs specifically disclaim any federal cause of action or any claim that would give rise to federal jurisdiction. To the extent that any of Plaintiff's asbestos exposure took place on a federal enclave, or to the extent that any of Plaintiff's asbestos exposure occurred on board vessels of the United States military (including Naval ships), or in the construction, maintenance and/or repair of United States military vessels and/or aircraft, Plaintiff's negligence claims against manufacturers, sellers and suppliers of asbestos-containing products installed on such vessels and/or aircraft are not based on the theory of defective design, but rather are based only on the theory of failure to warn. Since there is no evidence that the United States Government or any of its military branches, specifically instructed manufacturers from which it purchased asbestos-containing products not to warn about the health hazards associated with exposure to asbestos, there can be no valid claim to federal jurisdiction pursuant to federal enclave, federal officer or federal contractor provisions of the United States Code. This disclaimer pertains to all of Plaintiff's claims, including those of negligence and products liability, as asserted herein.

JURY DEMAND

Plaintiffs demand trial by jury as to all issues of fact so triable.

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, notice is hereby given that Moshe Maimon, Esq. is designated as trial counsel in the above captioned matter.

DEMAND FOR INTERROGATORIES

Pursuant to the Asbestos Litigation General Order, Section VI.B. which can be found at <http://www.judiciary.state.nj.us/mass-tort/asbestos/manual/generallorder1.pdf>, Plaintiffs hereby demand that the above listed Defendants answer Standard Interrogatories in the form prescribed by the Court and within the time provided by the above referenced Order. A copy of the Standard Interrogatories are contained in the Asbestos Manual and be obtained from the Clerk or by visiting the following website:

http://www.judiciary.state.nj.us/mass-tort/asbestos/asbestos_amended_std_complaint.pdf

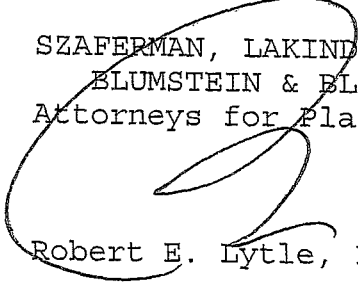
CERTIFICATION PURSUANT TO R. 4:5-1

Pursuant to Rule 4:5-1, I certify that the matter in controversy is not the subject of any other action pending in any court, or of a pending arbitration proceeding, that no other action or arbitration proceeding is contemplated, and that I am

not aware of any non-party who should be joined in this action pursuant to R. 4:28 or who is subject to joinder pursuant to R. 4:29-1 (b) because of potential liability to any party on the basis of the same facts.


I further certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false that I am subject to punishment.

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
Attorneys for Plaintiffs

By: 
Robert E. Lytle, Esq.

Dated: December 22, 2016

LEVY KONIGSBERG, LLP
Attorneys for Plaintiffs

By: 
Moshe Maimon, Esq.

Dated: December 22, 2016

SZAFERMAN, LAKIND,
 BLUMSTEIN & BLADER, P.C.
 By: Robert E. Lytle, Esq. (NJ ID# 046331990)
 101 Grovers Mill Road, Suite 200
 Lawrenceville, N.J. 08648
 (609) 275-0400

RECEIVED & FILED
 2016 DEC 23 A 10:51
 MIDDLESEX CIVIL DIV
 MIDDLESEX VICINAGE

LEVY KONIGSBERG, LLP
 By: Moshe Maimon, Esq. (NJ ID No.042691986)
 101 Grovers Mill Road, Suite 200
 Lawrenceville, N.J. 08648
 (609) 720-0400

Attorneys for Plaintiffs

STEPHEN LANZO III and KENDRA
 LANZO,
 Plaintiffs,

v.

CYPRUS AMAX MINERALS COMPANY,
 individually and as
 successor-in-interest to
 American Talc Company,
 Metropolitan Talc Company,
 Inc., Charles Mathieu, Inc.,
 Resource Processors, Inc. and
 Windsor Minerals, Inc., et al.
 Defendants.

SUPERIOR COURT OF NEW JERSEY
 LAW DIVISION, MIDDLESEX COUNTY

DOCKET NO.: MID-L- -16AS

Civil Action
 Asbestos Litigation

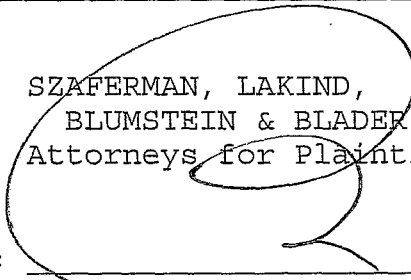
INITIAL FACT SHEET

MID-L- 7385-16 AS

1. Full Name:	Stephen Lanzo, III
2. Date of Birth:	September 8, 1972
3. Address:	11 Glen Road, Verona, NJ 07044
4. Union/Local/Years of Membership:	n/a
5. Date of first claimed asbestos exposure:	Approximately 1972
6. Date of last claimed asbestos exposure:	Approximately 2003
7. Smoking History:	Yes



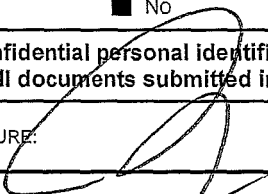
8. State the inclusive dates of smoking history, the products smoked and the amount of product consumed per day:		
a. Dates:	Up to approximately 2002.	
b. Products smoked:	Cigars	
c. Amount per day:	Occasionally	
9. Provide as much of the following information as is presently available: work sites, inclusive dates and trade or occupation for each site:		
n/a	Approximately 1972- Approximately 2003	Daily Personal use of Talc Powder Products
10. State the claimed asbestos related diseases; include the date of diagnosis and the name of the diagnosing physician or institution (if available attached is a copy of the medical report).		
a. Disease:	Mesothelioma	
b. Date of Diagnosis:	July 27, 2016	
c. Doctor/ Institution:	CHI St. Luke's Health 6624 Fannin Street, #1100, Houston, TX 77030	

SZAFERMAN, LAKIND,
BLUMSTEIN & BLADER, P.C.
Attorneys for Plaintiffs

By: 
Robert E. Lytle, Esq.

Dated: December 27, 2016

Appendix XII-B1

	<h2 style="margin:0;">CIVIL CASE INFORMATION STATEMENT (CIS)</h2> <p style="margin:0;">Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule 4:5-1</i> Pleading will be rejected for filing, under <i>Rule 1:5-6(c)</i>, if information above the black bar is not completed or attorney's signature is not affixed</p>		FOR USE BY CLERK'S OFFICE ONLY PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA CHG/CK NO. 7016 DEC 23 A 10:51 AMOUNT: MASS TORT CIVIL DIV OVERPAYMENT: A VOUCHER BATCH NUMBER:
	ATTORNEY / PRO SE NAME Robert E. Lytle (NJ ID # 046331990)		TELEPHONE NUMBER
	COUNTY OF VENUE Middlesex		DOCKET NUMBER (when available) MID-L- 16AS
	FIRM NAME (if applicable) Szaferman, Lakind, Blumstein & Blader, P.C.		OFFICE ADDRESS 101 Grovers Mill Road, Suite 200 Lawrenceville, NJ 08648
NAME OF PARTY (e.g., John Doe, Plaintiff) Stephen Lanzo III, Plaintiff		CAPTION Cyprus Mineral Co., as successor to American Talc Company, Metropolitan Talc Company, Inc., Charles Mathieu, Inc., Resource Processors, Inc., and Windsor Minerals, Inc., et al, Defendant.	
CASE TYPE NUMBER (See reverse side for listing) 601	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.	
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS	
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) <input checked="" type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule 1:38-7(b)</i> .			
ATTORNEY SIGNATURE: 		Robert E. Lytle, Esq.	



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under *Rule 4:5-1*

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)

Track I - 150 days' discovery

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|---|--|
| <ul style="list-style-type: none"> 271 ACCUTANE/ISOTRETINOIN 274 RISPERDAL/SEROQUEL/ZYPREXA 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL 282 FOSAMAX 285 STRYKER TRIDENT HIP IMPLANTS 286 LEVAQUIN 287 YAZY/ASMIN/OCELLA 289 REGLAN 290 POMPTON LAKES ENVIRONMENTAL LITIGATION 291 PELVIC MESH/GYNECARE | <ul style="list-style-type: none"> 292 PELVIC MESH/BARD 293 DEPUY ASR HIP IMPLANT LITIGATION 295 ALLODERM REGENERATIVE TISSUE MATRIX 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS 297 MIRENA CONTRACEPTIVE DEVICE 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR 300 TALC-BASED BODY POWDERS 601 ASBESTOS 623 PROPECIA |
|---|--|

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category Putative Class Action Title 59