UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

IN RE: TAXOTERE (DOCETAXEL)	: MDL NO. 2740		
PRODUCTS LIABILITY LITIGATION	: SECTION "H" (5)		
	: JUDGE MILAZZO		
	: MAG. JUDGE NORTH		
Plaintiff(s),	: COMPLAINT & JURY DEMAND		
1 minum(3),	: Civil Action No.:		
VS.	:		
	: :		
	:		
Defendant(s).	: :		
	:		
SHORT FORM COMPLAINT (E	Affective as of January 4, 2019) mended Master Long Form Complaint and Jury		
Fiamum(s) incorporate by reference the Ar	mended Waster Long Porm Complaint and Jury		
Demand filed in the above-referenced case on Jul	ly 25, 2017. Pursuant to Pretrial Order No. 15,		
this Short Form Complaint adopts allegations	and encompasses claims as set forth in the		
Amended Master Long Form Complaint against D	pefendant(s).		
Plaintiff(s) further allege as follows:			
1. Plaintiff:			

This version of the Short Form Complaint supersedes all prior versions of the form pursuant to Pretrial Order No. 73. This Court-approved version of the Short Form Complaint is available on the Court's Taxotere webpage and through MDL Centrality.

_	onsortiur		other party making loss of independent/secondary claim (i.e., loss
	er type of		iff and capacity (i.e., administrator, executor, guardian,
Curi	rent State	e of Re	sidence:
State	e in whic	h Plair	ntiff(s) allege(s) injury:
Defe	endants (check a	all Defendants against whom a Complaint is made):
a.	Taxo	tere Br	and Name Defendants
		A.	Sanofi US Services Inc. f/k/a Sanofi-Aventis U.S. Inc.
		B.	Sanofi-Aventis U.S. LLC
b.	Other	Brand	Name Drug Sponsors, Manufacturers, Distributors
		A.	Sandoz Inc.
		B.	Accord Healthcare, Inc.
		C.	McKesson Corporation d/b/a McKesson Packaging
		D.	Hospira Worldwide, LLC f/k/a Hospira Worldwide, Inc.
		E.	Hospira, Inc.
		F.	Sun Pharma Global FZE
		G.	Sun Pharmaceutical Industries, Inc. f/k/a Caraco Pharmaceutica
		H.	Laboratories Ltd. Pfizer Inc.
		I.	Actavis LLC f/k/a Actavis Inc.
		J.	Actavis Pharma, Inc.

			17	041	
			K.	Other:	
7.	Basis	for Juri	isdiction	n:	
		Diver	rsity of	Citizenship)
					pasis for jurisdiction must be pled in sufficient detail as ple Federal Rules of Civil Procedure):
8.	Venu				
δ.					
					which remand and trial is proper and where you might t Form Complaint absent the direct filing Order entered
		is Court			
9.	Branc	d Produ	ct(s) us	ed by Plain	atiff (check applicable):
		A.	Taxo	otere	
		B.	Doce	efrez	
		C.	Doce	etaxel Inject	tion
		D.	Doce	etaxel Inject	tion Concentrate
		E.	Unkn	nown	
		F.	Other	r:	

	e and last date of use (or approximate date range, if spec) for Products identified in question 9:
State in w	which Product(s) identified in question 9 was/were administered:
	re and extent of alleged injury (including duration, approximate of onset (if known), and description of alleged injury):
Cour	nts in Master Complaint brought by Plaintiff(s):
	Count I – Strict Products Liability - Failure to Warn Count III – Negligence Count IV – Negligent Misrepresentation
	Count V – Fraudulent Misrepresentation Count VI – Fraudulent Concealment Count VII – Fraud and Deceit
	Other: Plaintiff(s) may assert the additional theories and/or State Causes of Action against Defendant(s) identified by selecting "Other" and setting forth such claims below. If Plaintiff(s) includes additional theories of recovery, for example, Redhibition under Louisiana law or state consumer protection claims, the specific facts and allegations supporting additional theories must be pleaded by Plaintiff in sufficient detail as required by the applicable Federal Rules of Civil Procedure.

are

14.	Name of Attorney(s), Bar Number(s), Law Firm(s), Phone Number(s), Email Address(es) and Mailing Address(es) representing Plaintiff(s):
	By: