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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

GERALD PAYNE,)	
)	Case No.
Plaintiff,)	
)	COMPLAINT
v.)	
)	Jury Trial Demanded
ETHICON, INC.)	
)	
Defendants.)	
_____)	

COMES NOW Plaintiff Gerald Payne and files this Complaint against Defendant Ethicon, Inc., and alleges as follows:

PARTIES AND JURISDICTION

1. Plaintiff Gerald Payne is a resident of Ada County, Idaho.
2. Defendant Ethicon, Inc. ("Ethicon") is a New Jersey corporation headquartered in Sommerville, New Jersey
3. This is a lawsuit for personal injury damages in excess of \$75,000.00. The parties are citizens/entities of different states. Subject matter jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1332.

4. Defendant is subject to *in personam* jurisdiction in the U.S. District Court for the District of Idaho because it placed a defective product in the stream of commerce and that product caused personal injuries to Plaintiff, who resides in Idaho.

FACTUAL ALLEGATIONS

5. Following a surgery in 2010, Plaintiff developed an incisional hernia.

6. Plaintiff underwent a laparoscopic ventral incisional hernia repair with mesh placement on August 26, 2010 at St. Alphonsus Regional Medical Center, Boise, Idaho.

7. Following the surgery, there was a noticeable “bulge” that did not resolve until the mesh was eventually removed on November 14, 2017.

8. From August 26, 2010 to present, Plaintiff suffers from chronic increased pain in the area from which the mesh was placed.

9. In addition to the constant and worsening pain, Plaintiff felt “weak,” lost core strength, had restricted activities of daily living, had bouts of nausea and had to wear a “binder” which was needed for all activities, which limited Plaintiff’s mobility.

10. In August 2017, Plaintiff’s symptoms became so severe that he went to the St. Alphonsus Emergency Room in Eagle, Idaho, where providers performed a CT scan, among other tests, and determined that Plaintiff’s intestinal tract was being “blocked” by the mesh and Plaintiff was sent by ambulance to St. Alphonsus Regional Medical Center in Boise, Idaho.

11. Dr. Steve Williams was able to relieve the bowel obstruction but explained to Plaintiff that the relief was “very temporary” and that Plaintiff required a “component separation surgery.” That surgery was scheduled on November 14, 2017.

12. Dr. Williams explained to Plaintiff that the mesh “had not done its job” and had not “adhered to the muscle as intended.”

13. Dr. Williams removed the mesh. The Anatomic Pathology diagnosis read, “PhysioMesh and omentum, resection: Adipose tissue with focal foreign body consistent with mesh and associated foreign body giant cell reduction.”

14. Plaintiff’s recovery from the November 14, 2017 surgery has been extremely difficult, painful and debilitating, to the point that he has been unable to work.

15. Ethicon designs, manufactures, markets, packages, labels and sells medical devices, including a medical device known as Physiomesh, a composit mesh product implanted to treat persons like Plaintiff for hernias (also referred to as the “Product”).

16. The Product has numerous defects that create a high risk of unreasonable and dangerous injuries and side effects with severe permanent adverse health consequences including that the material in the Product abrades tissues adversely affecting patient health and regularly fail to perform the purpose of its implantation such that the patient requires repair and/or removal of the Product and repeated treatment and surgery.

17. Prior to the time that the Product was implanted in Plaintiff, Defendant was aware of numerous defects in the Product. Despite being aware of the numerous defects and unreasonable risks in the Product, Defendant manufactured, marketed, and distributed the Product with the intent they would be implanted in patients. Defendant was aware that implanting the Product in patients was likely to cause injury and harm to the patients into whom the Product was implanted. Alternatively, Defendant failed to

exercise reasonable care in determining the risks and potential adverse consequences of implanting the Product into patients.

18. Defendant made public statements in the form of written product descriptions, product labels, promotional materials and other materials that asserted that implanting the Product in patients was safe and would not cause harm to patients. These statements were made with the intent that medical professionals and members of the public would rely upon them, with the intent that members of the public would pay for the Product and that the Product would be implanted in patients. When Defendant made these statements, Defendant knew that the statements were inaccurate. Alternatively, when Defendant made these statements Defendant should have known the statements were inaccurate.

19. Representatives of Defendant also made statements to numerous individuals, including medical professionals, that implanting the Product in patients was safe and would not cause harm to patients. When Defendant's representatives made these statements, Defendant knew that the statements were inaccurate. Alternatively, when Defendant's representatives made these statements, Defendant should have known the statements were inaccurate.

20. Before Plaintiff suffered the injuries complained of herein, Defendant was on notice of numerous bodily injuries caused by the Product, and based thereon, Defendant knew or should have known that the Product caused an unreasonably high rate of infection, extrusion, perforation, chronic pain and/or abscess in people implanted with the Product.

21. Even though Defendant has known or should have known that the Product created a foreseeable, unreasonable risk of harm to those patients into whom they were implanted, Defendant continued to market the Product in the United States. Defendant has sold thousands of Product in the United States alone.

22. Defendant has never provided adequate warning or information to physicians who implanted the Product, or to people implanted with the Product, of the risks that the Product cause an unreasonably high rate of infection, extrusion, perforation, chronic pain and/or abscess.

COUNT I: STRICT LIABILITY MANUFACTURING DEFECT

23. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the preceding paragraphs.

24. At all relevant times, Defendant designed, manufactured, tested, packaged, labeled, promoted, distributed and sold the Product and Plaintiff was the recipient of their product.

25. The Product was expected to and did reach the usual consumers, handlers, and persons coming into contact with the Product without substantial change in the condition in which it was produced, manufactured, sold, and distributed by the Defendant.

26. At those times, the Product was in an unsafe, defective, and inherently dangerous condition, which was dangerous to users, and in particular, Plaintiff. Plaintiff contends that the defective condition of the Product and the lack of ordinary care in manufacturing the Product is obvious and within the range of comprehension of the average juror without speculation.

27. The Product manufactured, sold, and distributed by the Defendant was defective in manufacture in that, when it left the hands of the manufacturer and/or suppliers, the foreseeable risk exceeded the benefits associated with the use of the Product.

28. The Product implanted into Plaintiff was being used in a manner reasonably anticipated at the time it was implanted in him.

29. The Product, at the time they left the possession of Defendant, was inherently dangerous for its intended use and was an unreasonably dangerous product which presented and constituted an unreasonable risk of danger and injury to Plaintiff as follows:

- a. The Product was sold in a defective condition by manufacture;
- b. The Product as manufactured was unsafe for Plaintiff;
- c. The Product as manufactured was unreasonably dangerous to Plaintiff;
- d. The Product did not perform safely as an ordinary consumer/patient, like Plaintiff, would expect;
- e. The Product as manufactured was unsafe for its intended use; and
- f. Defendant knew the component parts of the Product as implemented through manufacture could cause injury to the end user.

30. For all these reasons, the Defendant has become strictly liable in tort to Plaintiff for manufacturing, selling, and distributing the Product for use in repairing an ventral incisional hernia.

31. The defects in the Product were a substantial factor in causing Plaintiff's injuries.

32. Defendant acted recklessly, willfully, wantonly and with a significant indifference to, and conscious disregard for the safety of others, including Plaintiff, by manufacturing and selling the dangerous and defective Product to Plaintiff. Defendant's reckless disregard for Plaintiff's safety by deliberately exposing him to the dangerous and defective Product warrant the imposition of punitive damages.

33. As a direct and proximate result of manufacturing defects in Defendant's Product, Plaintiff suffered and will continue to suffer injuries and damages.

COUNT II: NEGLIGENT FAILURE TO WARN

34. Plaintiff realleges and incorporates by reference each and every allegation contained in the preceding paragraphs.

35. Defendant failed to adequately warn consumers of the dangers associated with the Product and said failure caused Plaintiff's injury. If Defendant had issued a proper warning to consumers, Plaintiff would not have had the Product implanted and Plaintiff's injuries would have been avoided.

36. The Product has numerous defects that create a high risk of unreasonable and dangerous injuries and side effects with severe permanent adverse health consequences including that the material in the Product abrades tissues adversely affecting patient health and regularly fail to perform the purpose of its implantation such that the patient requires repair and/or removal of the Product and repeated treatment and surgery.

37. The warnings provided to Plaintiff's healthcare providers in their capacities as learned intermediaries were improper because they did not reflect the full extent of the potential health complications associated with using the Product.

38. Had Defendant adequately warned Plaintiff's healthcare providers of the risks associated with the Product, the healthcare providers, acting as reasonably prudent healthcare providers, would have elected not to use the Product to repair Plaintiff's incisional hernia.

39. Defendant acted recklessly, willfully, wantonly and with a significant indifference to, and conscious disregard for the safety of others, including Plaintiff, through their negligent failure to adequately warn Plaintiff of the dangerous and defective nature of the Product. Defendant's reckless disregard for Plaintiff's safety through its negligent failure to adequately warn him of the dangerous and defective nature of the Product warrants the imposition of punitive damages.

40. As a direct and proximate result of the Defendant's negligent failure to warn, Plaintiff suffered and will continue to suffer injuries and damages.

COUNT III: NEGLIGENT PREPARATION OF PRODUCT

41. Plaintiff re-alleges and incorporates by reference each and every allegation contained in the preceding paragraphs.

42. Defendant had a duty to individuals, including Plaintiff, to use reasonable care in the preparation of the Product for use in repairing inguinal hernias.

43. The Product have numerous defects that create a high risk of unreasonable and dangerous injuries and side effects with severe permanent adverse health consequences including that the material in the Product abrades tissues adversely affecting patient health and regularly fail to perform the purpose of its implantation such that the patient requires repair and/or removal of the Product and repeated treatment and surgery.

44. Defendant was negligent in preparing the Product for use in repairing incisional hernias. The Product was manufactured improperly. The Defendant has breached their duty to manufacture the Product line without any defects.

45. Defendant acted recklessly, willfully, wantonly and with a significant indifference to, and conscious disregard for the safety of others, including Plaintiff, through its negligent preparation of the Product, a dangerous and defective product. Defendant's reckless disregard for Plaintiff's safety through their negligent preparation of the Product warrants the imposition of punitive damages.

46. As a direct and proximate result of the Defendant's negligence, Plaintiff suffered and will continue to suffer injuries and damages.

COUNT IV: ATTORNEY FEES AND COSTS

46. As a result of Defendant's wrongful acts as set forth above, Plaintiff has been compelled to retain Crandall Law Offices to pursue this action. Plaintiff should be awarded his attorney fees and costs pursuant to applicable law.

WHEREFORE, Plaintiff requests that the Court grant the following relief against the Defendant:

- (A) Money damages representing fair, just and reasonable compensation for his claims;
- (B) Punitive and/or exemplary damages pursuant to state law;
- (C) Disgorgement of profits and restitution of all costs;
- (D) Attorney fees and costs of suit pursuant to state law;
- (E) Pre-judgment and post-judgment interest as authorized by state law on the judgments which will enter on Plaintiff's behalf;

(F) Such other relief the Court deems just and appropriate.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury of at least twelve (12) members on all issues properly tried to jury in the above-entitled matter.

Dated this 10th day of January, 2018.

CRANDALL LAW OFFICE

By: /s/Douglas W. Crandall
Douglas W. Crandall
Attorney for Plaintiff Gerald Payne

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

District of Idaho



GERALD PAYNE

Plaintiff(s)

v.

ETHICON, INC.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Douglas K. Chai
Johnson & Johnson
One Johnson & Johnson Plaza
New Brunswick, New Jersey 08933

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Douglas W. Crandall
Crandall Law Office
910 W. Main Street, Suite 222
Boise, Idaho 83702
P: 208-343-1211
F: 208-336-1211

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

JS 44 (Rev. 06/17)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p>I. (a) PLAINTIFFS Gerald Payne</p> <p>(b) County of Residence of First Listed Plaintiff <u>Ada</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p>(c) Attorneys (Firm Name, Address, and Telephone Number) Douglas W. Crandall, Crandall Law Office, 910 W. Main Street, Suite 222, Boise, Idaho 83702, P: 208-343-1211, F: 208-336-2088</p>	<p>DEFENDANTS Ethicon, Inc.</p> <p>County of Residence of First Listed Defendant <u>Somerset</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.</p> <p>Attorneys (If Known)</p>
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<p>II. BASIS OF JURISDICTION <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input checked="" type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> <td></td> <td style="text-align: center;">PTF</td> <td style="text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input checked="" type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input checked="" type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. NATURE OF SUIT *(Place an "X" in One Box Only)* Click here for: Nature of Suit Code Descriptions.

<p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p>	<p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input type="checkbox"/> 360 Other Personal Injury</p> <p><input type="checkbox"/> 362 Personal Injury - Medical Malpractice</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input checked="" type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p>PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p>	<p>FORFEITURE/PENALTY</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881</p> <p><input type="checkbox"/> 690 Other</p> <p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Management Relations</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 751 Family and Medical Leave Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Employee Retirement Income Security Act</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p>	<p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 835 Patent - Abbreviated New Drug Application</p> <p><input type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609</p>	<p>OTHER STATUTES</p> <p><input type="checkbox"/> 375 False Claims Act</p> <p><input type="checkbox"/> 376 Qui Tam (31 USC 3729(a))</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 896 Arbitration</p> <p><input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p>
<p>REAL PROPERTY</p> <p><input type="checkbox"/> 210 Land Condemnation</p> <p><input type="checkbox"/> 220 Foreclosure</p> <p><input type="checkbox"/> 230 Rent Lease & Ejectment</p> <p><input type="checkbox"/> 240 Torts to Land</p> <p><input type="checkbox"/> 245 Tort Product Liability</p> <p><input type="checkbox"/> 290 All Other Real Property</p>	<p>CIVIL RIGHTS</p> <p><input type="checkbox"/> 440 Other Civil Rights</p> <p><input type="checkbox"/> 441 Voting</p> <p><input type="checkbox"/> 442 Employment</p> <p><input type="checkbox"/> 443 Housing/Accommodations</p> <p><input type="checkbox"/> 445 Amer. w/Disabilities - Employment</p> <p><input type="checkbox"/> 446 Amer. w/Disabilities - Other</p> <p><input type="checkbox"/> 448 Education</p>	<p>PRISONER PETITIONS</p> <p>Habeas Corpus:</p> <p><input type="checkbox"/> 463 Alien Detainee</p> <p><input type="checkbox"/> 510 Motions to Vacate Sentence</p> <p><input type="checkbox"/> 530 General</p> <p><input type="checkbox"/> 535 Death Penalty</p> <p>Other:</p> <p><input type="checkbox"/> 540 Mandamus & Other</p> <p><input type="checkbox"/> 550 Civil Rights</p> <p><input type="checkbox"/> 555 Prison Condition</p> <p><input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement</p>		

V. ORIGIN *(Place an "X" in One Box Only)*

1 Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from Another District *(specify)* 6 Multidistrict Litigation - Transfer 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity):*

Brief description of cause:
Health Care Produce Liability

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ _____ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY *(See instructions):* JUDGE _____ DOCKET NUMBER _____

DATE 1/10/2018 SIGNATURE OF ATTORNEY OF RECORD Douglas W. Crandall

FOR OFFICE USE ONLY RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____