

3. Other type of Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

N/A

4. Current State of Residence: Louisiana

5. State in which Plaintiff(s) allege(s) injury: Louisiana

6. Defendants (check all Defendants against whom a Complaint is made):

a. Taxotere Brand Name Defendants

- A. Sanofi S.A.
- B. Aventis Pharma S.A.
- C. Sanofi US Services Inc. f/k/a Sanofi-Aventis U.S. Inc.
- D. 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 Pharmaceutical Laboratories Ltd.
- H. Pfizer Inc.
- I. Actavis LLC f/k/a Actavis Inc.
- J. Actavis Pharma, Inc.

K. Other:

7. Basis for Jurisdiction:

Diversity of Citizenship

Other (any additional basis for jurisdiction must be pled in sufficient detail as required by the applicable Federal Rules of Civil Procedure):

8. Venue:

District Court and Division in which remand and trial is proper and where you might have otherwise filed this Short Form Complaint absent the direct filing Order entered by this Court:

Western District of Louisiana, Lafayette Division

9. Brand Product(s) used by Plaintiff (check applicable):

A. Taxotere

B. Docefrez

C. Docetaxel Injection

D. Docetaxel Injection Concentrate

E. Unknown

F. Other:

10. First date and last date of use (or approximate date range, if specific dates are unknown) for Products identified in question 9:

June 14, 2011 through October 21, 2011

11. State in which Product(s) identified in question 9 was/were administered:

Louisiana

12. Nature and extent of alleged injury (including duration, approximate date of onset (if known), and description of alleged injury):

Large bald spots on top of head with very thin regrowth

13. Counts in Master Complaint brought by Plaintiff(s):

- Count I – Strict Products Liability - Failure to Warn
- Count II – Strict Products Liability for Misrepresentation
- Count III – Negligence
- Count IV – Negligent Misrepresentation
- Count V – Fraudulent Misrepresentation
- Count VI – Fraudulent Concealment
- Count VII – Fraud and Deceit
- Count VIII – Breach of Express Warranty (Sanofi Defendants only)

- 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.



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: C. Brooks Cutter, CA 121407
Jennifer S. Domer, CA 305822
Cutter Law, P.C.
401 Watt Ave.
Sacramento, CA 95864
(916) 290-9400
bcutter@cutterlaw.com
jdomer@cutterlaw.com