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Pro Hoc Vice Application Pending

10 Attorneys for All Plaintiffs
11

12 **UNITED STATES DISTRICT COURT**

13 **SOUTHERN DISTRICT OF CALIFORNIA**

14 PHYLLIS ADAMS, DEBRA AKINS, MARY) Case No.: 12CV3083-WQH-DHB
ALLEN, LARRY ALVARADO, SANTE)
15 AMINTO, DEBORAH ANDERSON, NADINE)
ANDREWS, ESTELLA ANTHONY, DAWN)
16 ARNOLD, STACY ASTON, JEAN AULT,)
BETTY AVERETT, HELEN BAKER,)
17 MARGARET BALLINGER, MYRA BANKS,) **COMPLAINT FOR DAMAGES**
RUTH BARKLEY, SHIRLEY BARNES,)
18 JOHN BARRETT, TIM BARRY, CATHY)
BEEKER, MARILYN BELL, MARY)
19 BERGER, DON BERNDT, FRANK BEST,)
SONJA BESTER, DAWN BILISKI, VONCILE)
20 BILLINGS, DELORES BLACKERBY-DUNN,)
GERALDINE BLACKMON, KAREN BOLES,)
21 CAROL BOLTON, MAUDE BONAPARTE,)
DIANA BOTELLO, DARIE BRADLEY,)
22 MADELENE BRASHEAR, DIANNE) **DEMAND FOR JURY TRIAL**
BRONKHORST, MYRA BROWN, OSSIE)
23 BROWN, PHILLIP BROWN, RODNEY) Judge:
BRYANT, SHARON CALAHAN, DONALD) Dept.:
24 CALDWELL, DONALD CALLAWAY,)

1 CATHRYN CANNON, SHIRLEY CANTY,)
 DEBBIE CARDILLO, BARBARA)
 2 CARIGNAN, ARTHUR CARPENTER,)
 EMMANUEL CASTILLO, BEVERLY)
 3 CATALENO, TAMMY CHAMBERLAIN,)
 JOSEPH CHARRON, CAMELLA CHESSIR,)
 4 JERRI CHESTEEN, WENDELL CHRISTIAN,)
 PRESILIANA CISNEROS, BARBARA)
 5 CLARK, EDITH CLARK, OSCAR CLARK,)
 DARLA CLAY, ROBERT CLORE, HARRIET)
 6 COHEN, ANNA JEWEL COLE, CALVIN)
 COLE, DELORIS COLLINS, CHERYL)
 7 COLTHARP, DEMETRIA CONNER, CLARA)
 COOLEY, MARTHA COOPER, JUDITH)
 8 COPELAND, ALDINE COTTON, RAY COX,)
 BONNIE CRANE, DANIEL CREPPEL,)
 9 ALTON CRISP, RICKY CRUZ, CATHY)
 CULVER-BATCHELOR, SUSAN)
 10 CUMBERLAND, DWLYNN CURRY,)
 EVELYN CURTIS, VINCENT DADDAZIO,)
 11 DANNIE DALTON, FRANK DALTON,)
 LAVALLEE DAMRAU, TINIKIA DANIELS,)
 12 MARTHA DARTER, MARTIN DAVID,)
 SHEILA DAVIDSON, ESTELLA DAVIS,)
 13 ROGER DAVIS, LINDRA DAY, MILDRED)
 DAYE, MONIQUE DEJESUS, as next friend of)
 14 KAYLA DEJESUS, a minor child, JESSE)
 DENNY, JINNY DENNY, MARY)
 15 DESCHENES, SHIRLEY DEVAL,)
 BARBARA DILLARD, JAMES DILLARD,)
 16 SARINA DIMARCO, KENNETH DODRILL,)
 THOMAS DONALD, DJUANA DUHON,)
 17 ALFRED DUNN, MARGUERITE ECHOLS,)
 BOB EDWARDS, RENEE EDWARDS, CORA)
 18 EGWUONWU, KERRY EKKER, DAVID)
 EMISON, KATHLEEN ENOS, DOROTHY)
 19 ERARD, CLAYTON ESQUIVEL, JIMMY)
 EVANS, MAE EVANS, MARVIN FALLOW,)
 20 STEPHANIE FARRIS, SHIRLEY FERRANI,)
 LESLIE FINE, MARTHA FINNEY, WAYNE)
 21 FOGEL, individually and as personal)
 representative of the estate of DONNA FOGEL,)
 22 DEANNA FORD, JOHN FORD, GEOFFREY)
 FORESTER, SR., DAVID FORRESTER,)
 23 HOLLIE FOSTER, MARTHA FRICK, JOSE)
 FRONDA, MABEL FUGGHETT, ANGELA)
 24 FULTON, LUCY FURCH, JACQUELINE)

1 GAIMARI, MANUEL GALAVIZ, RHONDA)
GALGIER, BARRY GALLUP, EVELYN)
2 GANT, ELVA GARCIA, PHYLLIS GARCIA,)
VICTOR GARDEA, HERBERT GARISS,)
3 MARIANA GARZA, BOBBY GAVIN,)
LAURA M. GEORGE, PATSY GIBBY,)
4 JAMES GIBSON, KATHLEEN GILBREATH,)
HELEN GILL, PATRICIA GILL, PHILIP)
5 GODFREY, PHYLLIS GONZALEZ, BRENDA)
GORDON, KAREN GORDON, RENEE)
6 GORE, AUDREY GOTCHER, MARGARET)
GRACE, LEROY GRAHAM, ALEXANDRIA)
7 GRANT, LERONA GREEN, TERESA)
GREEN, ANNETTE GREENE, CHERYL)
8 GROSS, LINDA GROSS, LOIS GUCCIONE,)
DOROTHY GUILLORY, TWILA GULLATT,)
9 SULTAN HADDAD, LILLIE HADDOCK,)
HAROLD HAGER, CANDACE HAIGHT,)
10 ANDREW HALL, JERRY HALL, LINDA)
HALLORAN, HOLLIE HALVORSON,)
11 ROGER HAMM, SHIRLEY HAMM, ALENE)
HANCOCK, SANDRA HANCOCK, BETTIE)
12 HANSEN, LILLIE HARDIN, BETTY)
HARPER, GREGORY HARRIS, MARY L.)
13 HARRIS, ALEX HARVEY, JAMES)
HATFIELD, LEONE HATZIDAKIS, DEBI)
14 HAUCK, BETTY HAYNES, DANIEL)
HEBERT, ALMA HENRY, HELEN HENSON,)
15 JOYCE HENSON, PATRICIA HEPFER,)
BRENDA HESTER, MARCELA HESTICK,)
16 FRIEDA HILTON, JENNIFER HIRAK,)
BETTY HODGES, ELCIE HOGSTON,)
17 JOHNIE HOOPER, LYNDA HOWARD,)
RAYBURN HOWARD, MATTIE HUNTER,)
18 IVA HURLEY, WANDA HUTTON, DARLA)
JACKSON, EDWIN JACKSON, LOLA)
19 JACKSON, MOSEVELT JACKSON, JR.,)
ROSE JAMES, LOVELY JAMESON, JANET)
20 JEFFERSON, DEANNA JEFFREYS,)
AUDREY JENKINS, MARGARET JENKINS,)
21 MARY JENNEDY, WILMA JOHNER,)
ANTONETTE JOHNSON, ELLIS JOHNSON,)
22 PAULA JOHNSON, ROSE JOHNSON, GARY)
JOHNSTON, CATENIA JONES, GLENDA)
23 JONES, JOANNE JONES, LAURIE JONES,)
WANDA JONES, LEATRICE JOY-BAIRD,)
24 LOIS KARHINEN, EDWARD KASINGER,)

1 DELORES KELLER, PEGGER KEZER, CHE)
KING, SANDRIA)
2 KING, LATANYA KLISUS, HOLLIS)
KNAAK, LUCY KOCHMAN, RICHARD)
3 KOWALSKI, LIBBIE KUEHLER, ESTHER)
KURTZ, MARC KURTZ, MARIA)
4 KUSTANOVICH, LEONARD KUSHNELL,)
KRISTINE LACHUT, JAMES LANDRY,)
5 JEANETTE LANDRY, MICHAEL)
LAPETINA, TERRY LARGE, DONNA L.)
6 LAVEZZARE, KENDRA LAW, LUCILLE)
LEACH, MARY KAY LEBLANC, KAREN)
7 LEE, ZOLA LEE, GINA LEGGE, SHEILA)
LEIBA, DONNA LEMAY, LORRAINE)
8 LEWIS, JUSTIN LINDQUIST, KAREN LISS,)
MARY LITTLE, FAITH LOCKEE, VICKY)
9 LOONEY, LAURA LOVAS, ROBERT)
LUCAS, HERMAN LUCERO, PAMELA)
10 MADDOX, VIRGINIA MAIR, NICHOLAS)
MANCINI, ROWENA MANGUM, BIVIA)
11 MARTIN, CAROLYN MARTIN, DAVID)
MARTIN, JAMES MARTIN, JOANNE)
12 MARTIN, MARY MARTIN, TABITHA)
MARTIN, TAMMY MARTIN, DELORES)
13 MARTINEZ, ISABEL MARTINEZ, ALAN)
MAUGHAN, H. V. "HANK" MAUPIN, JR.,)
14 JILL MAY, THERESA MAYABB,)
CATHERINE MCCLAIN, BETTY)
15 MCCROREY, MARGARET MCDONALD,)
SHIRLEY MCGILL, ERIC MCKELLIPS,)
16 individually and as next friend of KALI GRACE)
MCKELLIPS, ALICE MCMANUS, SARAH)
17 TRILBY MCPHAIL, TEDDY MEADOWS,)
VIRGINIA MEANS, the estate of)
18 CONSTANCE MEEKS, ROBERT)
MEREDITH, NORA LEE MERSINO, JAMES)
19 MESSER, SHEILA MIDDLETON, MAE)
MILES, MARION MITCHELL, SAM)
20 MITCHELL, HELEN MOORE, JIM MORE,)
BARBARA MORRIS, JANICE MORRIS,)
21 SCOTT MORSE, individually and as next friend)
of JESSICA MORSE, a minor, JOHN)
22 MOULTON, MARTHA MULLINS, MARY)
MULLINS, AMY MUNDHENK, RONNIE)
23 MURRAY, PATRICIA MURRELL,)
DOROTHY MUSICK, ROCHELLE)
24 NAVARRO, ROBERT NELSON, EMMA)

1 NICHOLS, ROXANNE NICHOLS, JUDITH)
NICHOLSON, VERA NICKENS, LOIS)
2 NIEMANN, BUSTER NORDEN, RANDALL)
NORDEN, MARGARET OLIVER, BEVERLY)
3 OTTO, PEGGY OXENDINE, KATHY)
PAAAINA, MILAGROS PADILLA, FRANKIE)
4 PALMER, MARIA PANTOJA, PHYLISS)
PARGEON, MARGARET PARKER,)
5 SANDRA PARKER, PEARL PARTLOW,)
CHRIS PATTERSON, DEBRA PEDRAZA,)
6 ROBERT PEEVELY, PATSY PERKINS,)
MARY PERRY, GARY PETERSON,)
7 PAMELA PETTRY, SUZANNE PETTWAY,)
KATHERINE PHIPPS, SHIRLEY PIERCE,)
8 EDWIN POLHEMUS, KEVIN POTTER,)
CAROLYN POWELL, KAREN)
9 PRESTEGARD, LOUISE PRICE,)
ROSEMARY PUCKETT, BRUNELL RAINE,)
10 MYRA RAMSEY, PATRICIA RATLICK,)
KITTY RAY, BRIDGETTE REDMOND,)
11 MARTHA REED, REBECCA REED,)
WILLIAM REED, JANET RELIFORD,)
12 ELICIA RENEAU, ESTHER REYES,)
NATHINE RHODES, MEREDITH RICE,)
13 individually and as next friend of IZAIYAH)
RICE, a minor, DIANA L. RICHARDS,)
14 WINCODELL RICHARDSON, RANADA)
DAWN RILEY, MICHAEL ROBBINS, ROSIE)
15 ROBBINS, PAMALLA ROBERTS, TINA)
ROBERTS, JANICE ROBERTSON,)
16 CAROLYN ROBINSON, SHERRYL)
ROBINSON, VETA ROBINSON, BOBBY)
17 ROBY, JERI ROCHA, BARBARA ROGERS,)
TED P. ROLLINS, WILLIE ROY,)
18 ELIZABETH ROZZO, MARIA RUIZ, LEON)
RUSSELL, TOM RYANT, TINA SACHSE,)
19 HENRIETTA SALAZAR, RACHEL)
SALYERS, LOLA SAMPSON, LORAIN)
20 SANDERS, ROSEMARIE SANDERS,)
FRANKIE SANGSTER, SHIRLEY SANSOM,)
21 JO ANN SANTIAGO, MELODY SARENSEN,)
WINSTON SAVAGE, JOHN SCALTRITO,)
22 JEFFREY SCHNAPPER, PATRICIA)
SCHULTZ, DONNA SCHULZ, ROY)
23 SELESKA, JERRY SEWELL, ROBERTA)
SHAW, JAMES W. SIER, SR., RYCIA)
24 SILVERSTEIN, SHERRY SIMMONS,)
_____)

1 FANNIE SHINAULT, RONNIE SHOOK,)
 CALVIN SMITH, LARRY SMITH, MARY)
 2 ANN SMITH, SHIRLEY SMITH, TRESA)
 SMITH, VICKIE SMITH, DARRELL)
 3 SMITHWICK, JOHN SNYDER, WILLIAM)
 STANDLEY, CAROL JEAN STANLEY,)
 4 KATHLEEN STILES, KAREN)
 STRAUSBAUGH, MARY STRICKLAND,)
 5 CHERYL SULLINS, JUDY SURBER,)
 VIRGINIA SUTAK, RITA SVONABEC,)
 6 FLORENCE SWANGER, JUDY SYKES,)
 MARGARET TANDE, JUANITA TATUM,)
 7 PAULINE TATUM, SERENA TAVAREZ,)
 BRENDA TEAGUE, CAROL TEMPANY,)
 8 HATTIE TENNISON, TROY TERRELL, MAY)
 JOYCE TERRY, DANIEL THOMAS, GLORIA)
 9 THOMAS, MELISSA THOMAS, SHIRLEY)
 THOMAS, ELLA THOMPSON, JAMES)
 10 THOMPSON, JENNEL THOMPSON,)
 PATRICIA THOMPSON, VICTOR)
 11 THORNTON, ANTHONY TOMLIN, ELSIE)
 TONEY, BARRY TUER, SR., PATSY TUTEN,)
 12 DEBBIE UNDERWOOD, EVA VANVLEET,)
 KATHURN VEINO, KENNETH VINSON,)
 13 WILDA JEAN WAGGLE, BARBARA)
 WAGNER, TERRY WALBAUM, ERMA)
 14 WALKER, IRMA WALKER, MARY)
 WALKER, VENITA WALKER,)
 15 GWENDOLYNE WAMSLEY, DEBBIE)
 WARD, LAJEAN WARD, GREGORY)
 16 WASHINGTON, MARGIE WASHINGTON,)
 STEPHEN WATERMEIER, PATRICIA)
 17 WATKINS, TINA WATKINS, RUBY)
 WATSON, GINA WAX, CATHERINE)
 18 WEATHERSTONE, RYVA WEBB, VERNICE)
 WEBSTER, CHERI WESLOH, RONALD)
 19 WERTS, ELIZABETH WERY, GARY)
 WESTMORLAN, LANITRA WHITE, LORA)
 20 WHITE, REBA WHITEHURST, BARBRA)
 WHITMER, EVELYN WHITTENBURG,)
 21 BRINDA WILLIAMS, CAROLYN)
 WILLIAMS, DENISE WILLIAMS,)
 22 GERALDINE WILLIAMS, GERI WILLIAMS,)
 HELEN WILLIAMS, JUANITA WILLIAMS,)
 23 LEONARD WILLIAMS, LINDA WILLIAMS,)
 NEAL WILLIAMS, RUTHELL WILLIAMS,)
 24 DAWNE WILLIFORD, DANNY WILLING,)

1 CALVIN WILLIS, EMILY WILSON,)
 GEORGETTE WILSON, PETER WILSON,)
 2 VICKI WINKLER, CLAUDETTE WIREN,)
 CARLA WITT, MARY KAY WODYGA,)
 3 LAVERNE WOLF, MATTHEW WOODEN,)
 JAMI WOODHAM, JOHN WOODS, JOHN)
 4 WORLEY, SR., JOE WRIGHT, KIMBERLY)
 WRIGHT, SHIRLEY WRIGHT, BRENDA)
 5 YARNELL, LINDA YOUMANS, SARA J.)
 YOUNGBLOOD, and CAROL ZAFIRIS,)
 6 individuals,)
)
 7 Plaintiffs,)
 vs.)
 8)
 9 ASTRAZENECA PHARMACEUTICALS LP, a)
 Delaware corporation and ASTRAZENECA LP,)
 a Delaware corporation,)
 10)
 Defendants.)
 11)

12 Plaintiffs PHYLLIS ADAMS, DEBRA AKINS, MARY ALLEN, LARRY ALVARADO,
 13 SANTE AMINTO, DEBORAH ANDERSON, NADINE ANDREWS, ESTELLA ANTHONY,
 14 DAWN ARNOLD, STACY ASTON, JEAN AULT, BETTY AVERETT, HELEN BAKER,
 15 MARGARET BALLINGER, MYRA BANKS, RUTH BARKLEY, SHIRLEY BARNES, JOHN
 16 BARRETT, TIM BARRY, CATHY BEEKER, MARILYN BELL, MARY BERGER, DON
 17 BERNDT, FRANK BEST, SONJA BESTER, DAWN BILISKI, VONCILE BILLINGS, DELORES
 18 BLACKERBY-DUNN, GERALDINE BLACKMON, KAREN BOLES, CAROL BOLTON, MAUDE
 19 BONAPARTE, DIANA BOTELLO, DARIE BRADLEY, MADELENE BRASHEAR, DIANNE
 20 BRONKHORST, MYRA BROWN, OSSIE BROWN, PHILLIP BROWN, RODNEY BRYANT,
 21 SHARON CALAHAN, DONALD CALDWELL, DONALD CALLAWAY, CATHRYN CANNON,
 22 SHIRLEY CANTY, DEBBIE CARDILLO, BARBARA CARIGNAN, ARTHUR CARPENTER,
 23 EMMANUEL CASTILLO, BEVERLY CATALENO, TAMMY CHAMBERLAIN, JOSEPH
 24 CHARRON, CAMELLA CHESSIR, JERRI CHESTEEN, WENDELL CHRISTIAN, PRESILIANA

1 CISNEROS, BARBARA CLARK, EDITH CLARK, OSCAR CLARK, DARLA CLAY, ROBERT
2 CLORE, HARRIET COHEN, ANNA JEWEL COLE, CALVIN COLE, DELORIS COLLINS,
3 CHERYL COLTHARP, DEMETRIA CONNER, CLARA COOLEY, MARTHA COOPER, JUDITH
4 COPELAND, ALDINE COTTON, RAY COX, BONNIE CRANE, DANIEL CREPPEL, ALTON
5 CRISP, RICKY CRUZ, CATHY CULVER-BATCHELOR, SUSAN CUMBERLAND, DWLYNN
6 CURRY, EVELYN CURTIS, VINCENT DADDAZIO, DANNIE DALTON, FRANK DALTON,
7 LAVALLEE DAMRAU, TINIKIA DANIELS, MARTHA DARTER, MARTIN DAVID, SHEILA
8 DAVIDSON, ESTELLA DAVIS, ROGER DAVIS, LINDRA DAY, MILDRED DAYE, MONIQUE
9 DEJESUS, as next friend of KAYLA DEJESUS, a minor child, JESSE DENNY, JINNY DENNY,
10 MARY DESCHENES, SHIRLEY DEVALL, BARBARA DILLARD, JAMES DILLARD, SARINA
11 DIMARCO, KENNETH DODRILL, THOMAS DONALD, DJUANA DUHON, ALFRED DUNN,
12 MARGUERITE ECHOLS, BOB EDWARDS, RENEE EDWARDS, CORA EGWUONWU, KERRY
13 EKKER, DAVID EMISON, KATHLEEN ENOS, DOROTHY ERARD, CLAYTON ESQUIVEL,
14 JIMMY EVANS, MAE EVANS, MARVIN FALLOW, STEPHANIE FARRIS, SHIRLEY FERRANI,
15 LESLIE FINE, MARTHA FINNEY, WAYNE FOGEL, individually and as personal representative of
16 the estate of DONNA FOGEL, DEANNA FORD, JOHN FORD, GEOFFREY FORESTER, SR.,
17 DAVID FORRESTER, HOLLIE FOSTER, MARTHA FRICK, JOSE FRONDA, MABEL
18 FUGGHETT, ANGELA FULTON, LUCY FURCH, JACQUELINE GAIMARI, MANUEL
19 GALAVIZ, RHONDA GALGIER, BARRY GALLUP, EVELYN GANT, ELVA GARCIA, PHYLLIS
20 GARCIA, VICTOR GARDEA, HERBERT GARISS, MARIANA GARZA, BOBBY GAVIN,
21 LAURA M. GEORGE, PATSY GIBBY, JAMES GIBSON, KATHLEEN GILBREATH, HELEN
22 GILL, PATRICIA GILL, PHILIP GODFREY, PHYLLIS GONZALEZ, BRENDA GORDON,
23 KAREN GORDON, RENEE GORE, AUDREY GOTCHER, MARGARET GRACE, LEROY
24 GRAHAM, ALEXANDRIA GRANT, LERONA GREEN, TERESA GREEN, ANNETTE GREENE,

1 CHERYL GROSS, LINDA GROSS, LOIS GUCCIONE, DOROTHY GUILLORY, TWILA
2 GULLATT, SULTAN HADDAD, LILLIE HADDOCK, HAROLD HAGER, CANDACE HAIGHT,
3 ANDREW HALL, JERRY HALL, LINDA HALLORAN, HOLLIE HALVORSON, ROGER HAMM,
4 SHIRLEY HAMM, ALENE HANCOCK, SANDRA HANCOCK, BETTIE HANSEN, LILLIE
5 HARDIN, BETTY HARPER, GREGORY HARRIS, MARY L. HARRIS, ALEX HARVEY, JAMES
6 HATFIELD, LEONE HATZIDAKIS, DEBI HAUCK, BETTY HAYNES, DANIEL HEBERT, ALMA
7 HENRY, HELEN HENSON, JOYCE HENSON, PATRICIA HEPFER, BRENDA HESTER,
8 MARCELA HESTICK, FRIEDA HILTON, JENNIFER HIRAK, BETTY HODGES, ELCIE
9 HOGSTON, JOHNIIE HOOPER, LYNDA HOWARD, RAYBURN HOWARD, MATTIE HUNTER,
10 IVA HURLEY, WANDA HUTTON, DARLA JACKSON, EDWIN JACKSON, LOLA JACKSON,
11 MOSEVELT JACKSON, JR., ROSE JAMES, LOVELY JAMESON, JANET JEFFERSON,
12 DEANNA JEFFREYS, AUDREY JENKINS, MARGARET JENKINS, MARY JENNEDY, WILMA
13 JOHNER, ANTONETTE JOHNSON, ELLIS JOHNSON, PAULA JOHNSON, ROSE JOHNSON,
14 GARY JOHNSTON, CATENIA JONES, GLENDA JONES, JOANNE JONES, LAURIE JONES,
15 WANDA JONES, LEATRICE JOY-BAIRD, LOIS KARHINEN, EDWARD KASINGER, DELORES
16 KELLER, PEGGER KEZER, CHE KING, SANDRIA KING, LATANYA KLISUS, HOLLIS
17 KNAAK, LUCY KOCHMAN, RICHARD KOWALSKI, LIBBIE KUEHLER, ESTHER KURTZ,
18 MARC KURTZ, MARIA KUSTANOVICH, LEONARD KUSHNELL, KRISTINE LACHUT,
19 JAMES LANDRY, JEANETTE LANDRY, MICHAEL LAPETINA, TERRY LARGE, DONNA L.
20 LAVEZZARE, KENDRA LAW, LUCILLE LEACH, MARY KAY LEBLANC, KAREN LEE, ZOLA
21 LEE, GINA LEGGE, SHEILA LEIBA, DONNA LEMAY, LORRAINE LEWIS, JUSTIN
22 LINDQUIST, KAREN LISS, MARY LITTLE, FAITH LOCKEE, VICKY LOONEY, LAURA
23 LOVAS, ROBERT LUCAS, HERMAN LUCERO, PAMELA MADDOX, VIRGINIA MAIR,
24 NICHOLAS MANCINI, ROWENA MANGUM, BIVIA MARTIN, CAROLYN MARTIN, DAVID

1 MARTIN, JAMES MARTIN, JOANNE MARTIN, MARY MARTIN, TABITHA MARTIN, TAMMY
2 MARTIN, DELORES MARTINEZ, ISABEL MARTINEZ, ALAN MAUGHAN, H. V. "HANK"
3 MAUPIN, JR., JILL MAY, THERESA MAYABB, CATHERINE MCCLAIN, BETTY MCCROREY,
4 MARGARET MCDONALD, SHIRLEY MCGILL, ERIC MCKELLIPS, individually and as next
5 friend of KALI GRACE MCKELLIPS, ALICE MCMANUS, SARAH TRILBY MCPHAIL, TEDDY
6 MEADOWS, VIRGINIA MEANS, the estate of CONSTANCE MEEKS, ROBERT MEREDITH,
7 NORA LEE MERSINO, JAMES MESSER, SHEILA MIDDLETON, MAE MILES, MARION
8 MITCHELL, SAM MITCHELL, HELEN MOORE, JIM MORE, BARBARA MORRIS, JANICE
9 MORRIS, SCOTT MORSE, individually and as next friend of JESSICA MORSE, a minor, JOHN
10 MOULTON, MARTHA MULLINS, MARY MULLINS, AMY MUNDHENK, RONNIE MURRAY,
11 PATRICIA MURRELL, DOROTHY MUSICK, ROCHELLE NAVARRO, ROBERT NELSON,
12 EMMA NICHOLS, ROXANNE NICHOLS, JUDITH NICHOLSON, VERA NICKENS, LOIS
13 NIEMANN, BUSTER NORDEN, RANDALL NORDEN, MARGARET OLIVER, BEVERLY OTTO,
14 PEGGY OXENDINE, KATHY PAAAINA, MILAGROS PADILLA, FRANKIE PALMER, MARIA
15 PANTOJA, PHYLISS PARGEON, MARGARET PARKER, SANDRA PARKER, PEARL
16 PARTLOW, CHRIS PATTERSON, DEBRA PEDRAZA, ROBERT PEEVELY, PATSY PERKINS,
17 MARY PERRY, GARY PETERSON, PAMELA PETTRY, SUZANNE PETTWAY, KATHERINE
18 PHIPPS, SHIRLEY PIERCE, EDWIN POLHEMUS, KEVIN POTTER, CAROLYN POWELL,
19 KAREN PRESTEGARD, LOUISE PRICE, ROSEMARY PUCKETT, BRUNELL RAINE, MYRA
20 RAMSEY, PATRICIA RATLICK, KITTY RAY, BRIDGETTE REDMOND, MARTHA REED,
21 REBECCA REED, WILLIAM REED, JANET RELIFORD, ELICIA RENEAU, ESTHER REYES,
22 NATHINE RHODES, MEREDITH RICE, individually and as next friend of IZAIYAH RICE, a minor,
23 DIANA L. RICHARDS, WINCODELL RICHARDSON, RANADA DAWN RILEY, MICHAEL
24 ROBBINS, ROSIE ROBBINS, PAMALLA ROBERTS, TINA ROBERTS, JANICE ROBERTSON,

1 CAROLYN ROBINSON, SHERRYL ROBINSON, VETA ROBINSON, BOBBY ROBY, JERI
2 ROCHA, BARBARA ROGERS, TED P. ROLLINS, WILLIE ROY, ELIZABETH ROZZO, MARIA
3 RUIZ, LEON RUSSELL, TOM RYANT, TINA SACHSE, HENRIETTA SALAZAR, RACHEL
4 SALYERS, LOLA SAMPSON, LORAIN SANDERS, ROSEMARIE SANDERS, FRANKIE
5 SANGSTER, SHIRLEY SANSOM, JO ANN SANTIAGO, MELODY SARENSEN, WINSTON
6 SAVAGE, JOHN SCALTRITO, JEFFREY SCHNAPPER, PATRICIA SCHULTZ, DONNA
7 SCHULZ, ROY SELESKA, JERRY SEWELL, ROBERTA SHAW, JAMES W. SIER, SR., RYCIA
8 SILVERSTEIN, SHERRY SIMMONS, FANNIE SHINAULT, RONNIE SHOOK, CALVIN SMITH,
9 LARRY SMITH, MARY ANN SMITH, SHIRLEY SMITH, TRESA SMITH, VICKIE SMITH,
10 DARRELL SMITHWICK, JOHN SNYDER, WILLIAM STANDLEY, CAROL JEAN STANLEY,
11 KATHLEEN STILES, KAREN STRAUSBAUGH, MARY STRICKLAND, CHERYL SULLINS,
12 JUDY SURBER, VIRGINIA SUTAK, RITA SVONABEC, FLORENCE SWANGER, JUDY SYKES,
13 MARGARET TANDE, JUANITA TATUM, PAULINE TATUM, SERENA TAVAREZ, BRENDA
14 TEAGUE, CAROL TEMPANY, HATTIE TENNISON, TROY TERRELL, MAY JOYCE TERRY,
15 DANIEL THOMAS, GLORIA THOMAS, MELISSA THOMAS, SHIRLEY THOMAS, ELLA
16 THOMPSON, JAMES THOMPSON, JENNEL THOMPSON, PATRICIA THOMPSON, VICTOR
17 THORNTON, ANTHONY TOMLIN, ELSIE TONEY, BARRY TUER, SR., PATSY TUTEN,
18 DEBBIE UNDERWOOD, EVA VANVLEET, KATHURN VEINO, KENNETH VINSON, WILDA
19 JEAN WAGGLE, BARBARA WAGNER, TERRY WALBAUM, ERMA WALKER, IRMA
20 WALKER, MARY WALKER, VENITA WALKER, GWENDOLYNE WAMSLEY, DEBBIE
21 WARD, LAJEAN WARD, GREGORY WASHINGTON, MARGIE WASHINGTON, STEPHEN
22 WATERMEIER, PATRICIA WATKINS, TINA WATKINS, RUBY WATSON, GINA WAX,
23 CATHERINE WEATHERSTONE, RYVA WEBB, VERNICE WEBSTER, CHERI WESLOH,
24 RONALD WERTS, ELIZABETH WERY, GARY WESTMORLAN, LANITRA WHITE, LORA

1 WHITE, REBA WHITEHURST, BARBRA WHITMER, EVELYN WHITTENBURG, BRINDA
2 WILLIAMS, CAROLYN WILLIAMS, DENISE WILLIAMS, GERALDINE WILLIAMS, GERI
3 WILLIAMS, HELEN WILLIAMS, JUANITA WILLIAMS, LEONARD WILLIAMS, LINDA
4 WILLIAMS, NEAL WILLIAMS, RUTHELL WILLIAMS, DAWNE WILLIFORD, DANNY
5 WILLING, CALVIN WILLIS, EMILY WILSON, GEORGETTE WILSON, PETER WILSON, VICKI
6 WINKLER, CLAUDETTE WIREN, CARLA WITT, MARY KAY WODYGA, LAVERNE WOLF,
7 MATTHEW WOODEN, JAMI WOODHAM, JOHN WOODS, JOHN WORLEY, SR., JOE WRIGHT,
8 KIMBERLY WRIGHT, SHIRLEY WRIGHT, BRENDA YARNELL, LINDA YOUMANS, SARA J.
9 YOUNGBLOOD, and CAROL ZAFIRIS (together, Plaintiffs) bring this action against Defendants
10 ASTRAZENECA PHARMACEUTICALS LP and ASTRAZENECA LP (together, AstraZeneca).
11 Plaintiffs seek compensatory and punitive damages for the injuries they suffered as a result of taking
12 Nexium, a drug designed, manufactured, and marketed by AstraZeneca.

13 Plaintiffs hereby allege as follows:

14 **PARTIES**

- 15 1. Plaintiff Phyllis Adams is a resident of Jackson, Michigan.
- 16 2. Plaintiff Debra Akins is a resident of Lake City, Florida.
- 17 3. Plaintiff Mary Allen is a resident of Wesson, Mississippi.
- 18 4. Plaintiff Larry Alvarado is a resident of San Antonio, Texas.
- 19 5. Plaintiff Sante Aminto is a resident of Mays Landing, New Jersey
- 20 6. Plaintiff Deborah Anderson is a resident of Cadiz, Kentucky.
- 21 7. Plaintiff Nadine Andrews is a resident of Roberta, Georgia.
- 22 8. Plaintiff Estella Anthony is a resident of Houston, Texas.
- 23 9. Plaintiff Dawn Arnold is a resident of Twin Falls, Idaho.
- 24 10. Plaintiff Stacy Aston is a resident of Klamath Falls, Oregon.

- 1 11. Plaintiff Jean Ault is a resident of Dalton, Georgia.
- 2 12. Plaintiff Betty Averett is a resident of Chicago, Illinois.
- 3 13. Plaintiff Helen Baker is a resident of Hazard, Kentucky.
- 4 14. Plaintiff Margaret Ballinger is a resident of Hillsboro, Ohio.
- 5 15. Plaintiff Myra Banks is a resident of Moncks Corner, South Carolina.
- 6 16. Plaintiff Ruth Barkley is a resident of Ottumwa, Iowa.
- 7 17. Plaintiff Shirley Barnes is a resident of Spring Texas.
- 8 18. Plaintiff John Barrett is a resident of Pennsauken, New Jersey.
- 9 19. Plaintiff Tim Barry is a resident of Grazette, Arkansas.
- 10 20. Plaintiff Cathy Becker is a resident of Hickory, North Carolina.
- 11 21. Plaintiff Marilyn Bell is a resident of Tyler, Texas.
- 12 22. Plaintiff Mary Berger is a resident of Wytheville, Virginia.
- 13 23. Plaintiff Don Berndt is a resident of Lowell, Arkansas.
- 14 24. Plaintiff Frank Best is a resident of Covington, Tennessee.
- 15 25. Plaintiff Sonja Bester is a resident of Brookside, Alabama.
- 16 26. Plaintiff Dawn Biliski is a resident of Quakertown Pennsylvania.
- 17 27. Plaintiff Voncile Billings is a resident of Ozark, Alabama.
- 18 28. Plaintiff Delores Blackerby-Dunn is a resident of Semmes, Alabama.
- 19 29. Plaintiff Geraldine Blackmon is a resident of Omaha, Nebraska.
- 20 30. Plaintiff Karen Boles is a resident of Spring City, Tennessee.
- 21 31. Plaintiff Carol Bolton is a resident of Laconia, New Hampshire.
- 22 32. Plaintiff Maude Bonaparte is a resident of Lake City, South Carolina
- 23 33. Plaintiff Diana Botello is a resident of Corpus Christi, Texas.
- 24 34. Plaintiff Darie Bradley is a resident of Chicago, Illinois.

- 1 35. Plaintiff Madelene Brashear is a resident of Hazard, Kentucky.
- 2 36. Plaintiff Dianne Bronkhorst is a resident of Parkland Florida.
- 3 37. Plaintiff Myra Brown is a resident of Reserve, Louisiana.
- 4 38. Plaintiff Ossie Brown is a resident of San Antonio, Texas.
- 5 39. Plaintiff Phillip Brown is a resident of Tuttle, Oklahoma.
- 6 40. Plaintiff Rodney Bryant is a resident of Tarpon Springs, Florida.
- 7 41. Plaintiff Sharon Calahan is a resident of Greenville, Mississippi.
- 8 42. Plaintiff Donald Caldwell is a resident of Texas City, Texas.
- 9 43. Plaintiff Donald Callaway is a resident of Drury, Missouri.
- 10 44. Barbara Carignan is a resident of West Simsbury, Connecticut.
- 11 45. Plaintiff Cathryn Cannon is a resident of Montgomery, Alabama.
- 12 46. Plaintiff Shirley Canty is a resident of St. Petersburg, Florida.
- 13 47. Plaintiff Debbie Cardillo is a resident of Swanee, Georgia.
- 14 48. Plaintiff Arthur Carpenter is a resident of Newark, Ohio.
- 15 49. Plaintiff Emmanuel Castillo is a resident of Taft, Texas.
- 16 50. Plaintiff Beverly Cataleno is a resident of Chester Springs, Pennsylvania.
- 17 51. Plaintiff Tammy Chamberlain is a resident of Amarillo, Texas.
- 18 52. Plaintiff Joseph Charron is a resident of Baltic, Connecticut
- 19 53. Plaintiff Camella Chessir is a resident of Santa Fe, Texas.
- 20 54. Plaintiff Jerri Chesteen is a resident of Bush, Louisiana.
- 21 55. Plaintiff Wendell Christian is a resident of Counce, Tennessee.
- 22 56. Plaintiff Presiliana Cisneros is a resident of Dexter, New Mexico.
- 23 57. Plaintiff Barbara Clark is a resident of Galveston, Texas.
- 24 58. Plaintiff Edith Clark is a resident of Kynch Station, Virginia.

- 1 59. Plaintiff Oscar Clark is a resident of Burnsville, North Carolina.
- 2 60. Plaintiff Darla Clay is a resident of Houston, Texas.
- 3 61. Plaintiff Robert Clore is a resident of Cypress, Texas.
- 4 62. Plaintiff Harriet Cohen is a resident of Pikesville, Maryland.
- 5 63. Plaintiff Anna Jewel Cole is a resident of Mabank, Texas.
- 6 64. Plaintiff Calvin Cole is a resident of Dallas, Texas.
- 7 65. Plaintiff Deloris Collins is a resident of Pinetop, Kentucky.
- 8 66. Plaintiff Cheryl Coltharp is a resident of Waynetown, Indiana.
- 9 67. Plaintiff Demetria Conner is a resident of Pine Bluff, Arkansas.
- 10 68. Plaintiff Clara Cooley is a resident of Greenville, Mississippi.
- 11 69. Plaintiff Martha Cooper is a resident of Paris, Tennessee.
- 12 70. Plaintiff Judith Copeland a resident of Del Mar, California.
- 13 71. Plaintiff Aldine Cotton is a resident of Roberta, Georgia.
- 14 72. Plaintiff Ray Cox is a resident of Jacksboro, Tennessee.
- 15 73. Plaintiff Bonnie Crane is a resident of Redman, Oregon.
- 16 74. Plaintiff Daniel Creppel is a resident of Hessmer, Louisiana.
- 17 75. Plaintiff Alton Crisp is a resident of Dallas, Texas.
- 18 76. Plaintiff Ricky Cruz is a resident of Anson, Texas.
- 19 77. Plaintiff Cathy Culver-Batchelor is a resident of Lampasas, Texas.
- 20 78. Plaintiff Susan Cumberland is a resident of Atascosa, Texas.
- 21 79. Plaintiff Dwlynn Curry is a resident of Clayton, Alabama.
- 22 80. Plaintiff Evelyn Curtis is a resident of Vicksburg, Mississippi.
- 23 81. Plaintiff Vincent Daddazio is a resident of Rochester, New York.
- 24 82. Plaintiff Dannie Dalton is a resident of Matoaka, West Virginia.

- 1 83. Plaintiff Frank Dalton is a resident of Arthurdale, West Virginia.
- 2 84. Plaintiff Lavallee Damrau is a resident of Oak Creek, Wisconsin.
- 3 85. Plaintiff Tinikia Daniels is a resident of Marianna, Arkansas.
- 4 86. Plaintiff Martha Darter is a Resident of Pittsburg, Illinois.
- 5 87. Plaintiff Martin David is a resident of Kissimmee, Florida.
- 6 88. Plaintiff Sheila Davidson is a resident of Detroit, Texas.
- 7 89. Plaintiff Estella Davis is a resident of Earle, Arkansas.
- 8 90. Plaintiff Roger Davis is a resident of Warren, Ohio.
- 9 91. Plaintiff Lindra Day is a resident of Anderson, Indiana.
- 10 92. Plaintiff Mildred Daye is a resident of Liberty, New York.
- 11 93. Plaintiff Monique DeJesus, as next friend of Kayla DeJesus, a minor child, is a resident
12 of Lamarque, Texas.
- 13 94. Plaintiff Jesse Denny is a resident of Mount Hope, West Virginia.
- 14 95. Plaintiff Jinny Denny is a resident of Mount Hope, West Virginia.
- 15 96. Plaintiff Mary Deschenes is a resident of Apple Valley, California.
- 16 97. Plaintiff Shirley Devall is a resident of Albright, West Virginia.
- 17 98. Plaintiff Barbara Dillard is a resident of Morrison, Tennessee.
- 18 99. Plaintiff James Dillard is a resident of Morrison, Tennessee.
- 19 100. Plaintiff Sarina DiMarco is a resident of Peabody, Massachusetts.
- 20 101. Plaintiff Kenneth Dodrill is a resident of Castle Rock, Colorado.
- 21 102. Plaintiff Thomas Donald is a resident of Killeen, Texas.
- 22 103. Plaintiff Djuana Duhon is a resident of La Marque, Texas.
- 23 104. Plaintiff Alfred Dunn is a resident of Centre, Alabama.
- 24 105. Plaintiff Marguerite Echols is a resident of Toledo, Ohio.

- 1 106. Plaintiff Bob Edwards is a resident of Las Lunas, New Mexico.
- 2 107. Plaintiff Renee Edwards is a resident of Fayetteville, Arkansas.
- 3 108. Plaintiff Cora Egwuonwu is a resident of Tulsa, Oklahoma.
- 4 109. Plaintiff Kerry Ekker is a resident of Richfield, Utah.
- 5 110. Plaintiff David Emison is a resident of Zephyrhills, Florida.
- 6 111. Plaintiff Kathleen Enos is a resident of Kaneohe, Hawaii.
- 7 112. Plaintiff Dorothy Erard is a resident of Southport, North Carolina.
- 8 113. Plaintiff Clayton Esquivel is a resident of Pedroy, Montana.
- 9 114. Plaintiff Jimmy Evans is a resident of Jasper, Texas.
- 10 115. Plaintiff Mae Evans is a resident of Dallas, Texas.
- 11 116. Plaintiff Marvin Fallow is a resident of West Columbia, South Carolina.
- 12 117. Plaintiff Stephanie Farris is a resident of Palestine, Texas.
- 13 118. Plaintiff Shirley Ferrani is a resident of Hellertown, Pennsylvania.
- 14 119. Plaintiff Leslie Fine is a resident of South Bend, Indiana.
- 15 120. Plaintiff Martha Finney is a resident of Beckley, West Virginia.
- 16 121. Plaintiff Wayne Fogel, individually and as Personal Representative of the Estate of
17 Donna Fogel, is a resident of New Port Richey, Florida.
- 18 122. Plaintiff Deanna Ford is a resident of Palo, Iowa.
- 19 123. Plaintiff John Ford is a resident of Hudson, Florida.
- 20 124. Plaintiff Geoffrey Forester, Sr. is a resident of Campbell, Ohio.
- 21 125. Plaintiff David Forrester is a resident of Heber Springs, Arkansas.
- 22 126. Plaintiff Hollie Foster is a resident of Valley, Alabama.
- 23 127. Plaintiff Martha Frick is a resident of Plaistow, New Hampshire.
- 24 128. Plaintiff Jose Fronda is a resident of Las Vegas, Nevada.

- 1 129. Plaintiff Mabel Fughett is a resident of Valdosta, Georgia.
- 2 130. Plaintiff Angela Fulton is a resident of Ripley, Tennessee.
- 3 131. Plaintiff Lucy Furch is a resident of Fresno, California.
- 4 132. Plaintiff Jacqueline Gaimari is a resident of Houston, Texas.
- 5 133. Plaintiff Manuel Galaviz is a resident of Vidor, Texas.
- 6 134. Plaintiff Rhonda Galgier is a resident of Jennings, Louisiana.
- 7 135. Plaintiff Barry Gallup is a resident of Tonawanda, New York.
- 8 136. Plaintiff Evelyn Gant is a resident of Goodman, Missouri.
- 9 137. Plaintiff Elva Garcia is a resident of Temple, Texas.
- 10 138. Plaintiff Phyllis Garcia is a resident of Colfax, California.
- 11 139. Plaintiff Victor Gardea is a resident of Grantsville, Maryland.
- 12 140. Plaintiff Herbert Gariss is a resident of Washington, North Carolina.
- 13 141. Plaintiff Mariana Garza is a resident of La Porte, Texas.
- 14 142. Plaintiff Bobby Gavin is a resident of Vail, Arizona.
- 15 143. Plaintiff Laura M. George is a resident of Ridgeley, West Virginia.
- 16 144. Plaintiff Patsy Gibby is a resident of Andrews, North Carolina.
- 17 145. Plaintiff James Gibson is a resident of Mesa, Arizona.
- 18 146. Plaintiff Kathleen Gilbreath is a resident of Bastrop, Louisiana.
- 19 147. Plaintiff Helen Gill is a resident of Jamestown, Indiana.
- 20 148. Plaintiff Patricia Gill is a resident of Sharpsville, Pennsylvania.
- 21 149. Plaintiff Philip Godfrey is a resident of Kingstree, South Carolina.
- 22 150. Plaintiff Phyllis Gonzalez is a resident of San Antonio, Texas.
- 23 151. Plaintiff Brenda Gordon is a resident of Comanche, Oklahoma.
- 24 152. Plaintiff Karen Gordon is a resident of Cambria Height, New York.

- 1 153. Plaintiff Renee Gore is a resident of Shallote, North Carolina.
- 2 154. Plaintiff Audrey Gotcher is a resident of Sulphur Springs, Texas.
- 3 155. Plaintiff Margaret Grace is a resident of Mitchell, Indiana.
- 4 156. Plaintiff Leroy Graham is a resident of Webb City, Missouri.
- 5 157. Plaintiff Alexandria Grant is a resident of West Cordell, Georgia.
- 6 158. Plaintiff Lerona Green is a resident of Newport, Arkansas.
- 7 159. Plaintiff Teresa Green is a resident of Canon City, Colorado.
- 8 160. Plaintiff Annette Greene is a resident of North Charleston, South Carolina.
- 9 161. Plaintiff Cheryl Gross is a resident of Whitman, West Virginia.
- 10 162. Plaintiff Linda Gross is a resident of Whitewood, Virginia.
- 11 163. Plaintiff Lois Guccione is a resident of Godfrey Illinois.
- 12 164. Plaintiff Dorothy Guillory is a resident of Beaumont, Texas.
- 13 165. Plaintiff Twila Gullatt is a resident of Lake Village, Texas.
- 14 166. Plaintiff Sultan Haddad is a resident of Canoga Park, California.
- 15 167. Plaintiff Lillie Haddock is a resident of Milledgeville, Georgia.
- 16 168. Plaintiff Harold Hager is a resident of Montague, Texas.
- 17 169. Plaintiff Candace Haight is a resident of Dagus Mines, Pennsylvania.
- 18 170. Plaintiff Andrew Hall is a resident of Homasassa, Florida.
- 19 171. Plaintiff Jerry Hall is a resident of Dothan, Alabama.
- 20 172. Plaintiff Linda Halloran is a resident of Palm Harbor, Florida.
- 21 173. Plaintiff Hollie Halvorson is a resident of South Glyndon, Minnesota.
- 22 174. Plaintiff Roger Hamm is a resident of Bluefield, Virginia.
- 23 175. Plaintiff Shirley Hamm is a resident of Carruthersville, Missouri.
- 24 176. Plaintiff Alene Hancock is a resident of Cookville, Tennessee.

- 1 177. Plaintiff Sandra Hancock is a resident of Columbus, Ohio.
- 2 178. Plaintiff Bettie Hansen is resident of Dickenson, Texas.
- 3 179. Plaintiff Lillie Hardin is a resident of Terrell, Texas.
- 4 180. Plaintiff Betty Harper is a resident of Batesville, Arkansas.
- 5 181. Plaintiff Gregory Harris is a resident of Columbus, Ohio.
- 6 182. Plaintiff Mary L. Harris is a resident of Sykesville, Pennsylvania.
- 7 183. Plaintiff Alex Harvey is a resident of Pasadena, Texas.
- 8 184. Plaintiff James Hatfield is a resident of Galesburg, Michigan.
- 9 185. Plaintiff Leone Hatzidakis is a resident of Conway, South Carolina.
- 10 186. Plaintiff Debi Hauck is a resident of Helena, Montana.
- 11 187. Plaintiff Betty Haynes is a resident of Truman, Arkansas.
- 12 188. Plaintiff Daniel Hebert is a resident of Leland, Mississippi
- 13 189. Plaintiff Alma Henry is a resident of Port Gibson, Mississippi.
- 14 190. Plaintiff Helen Henson is a resident of Riverside, California.
- 15 191. Plaintiff Joyce Henson is a resident of Glasgow, Kentucky.
- 16 192. Plaintiff Patricia Hepfer is a resident of Sarasota, Florida.
- 17 193. Plaintiff Brenda Hester is a resident of Muscle Shoals, Alabama.
- 18 194. Plaintiff Marcela Hestick is a resident of Fairmont, West Virginia.
- 19 195. Plaintiff Frieda Hilton is a resident of Aurora, Missouri.
- 20 196. Plaintiff Jennifer Hiram is a resident of Rochester, New Hampshire.
- 21 197. Plaintiff Betty Hodges is a resident of Lake Alfred, Florida.
- 22 198. Plaintiff Elcie Hogston is a resident of Stallings, West Virginia.
- 23 199. Plaintiff Johniue Hooper is a resident of Philadelphia, Missouri.
- 24 200. Plaintiff Lynda Howard is a resident of Weiner, Arkansas.

- 1 201. Plaintiff Rayburn Howard is a resident of Weiner, Arkansas.
- 2 202. Plaintiff Mattie Hunter is a resident of Horsecave, Kentucky.
- 3 203. Plaintiff Iva Hurley is a resident of Vanlear, Kentucky
- 4 204. Plaintiff Wanda Hutton is a resident of Clinton, Tennessee.
- 5 205. Plaintiff Darla Jackson is a resident of Shawnee, Ohio.
- 6 206. Plaintiff Edwin Jackson is a resident of Garland, Texas.
- 7 207. Plaintiff Lola Jackson is a resident of Garland, Texas.
- 8 208. Plaintiff Mosevelt Jackson, Jr. is a resident of Brenham, Texas.
- 9 209. Plaintiff Rose James is a resident of Pensacola, Florida.
- 10 210. Plaintiff Lovely Jameson is a resident of Muskegon, Michigan.
- 11 211. Plaintiff Janet Jefferson is a resident of Ferriday, Louisiana.
- 12 212. Plaintiff Deanna Jeffreys is a resident of Manning, South Carolina.
- 13 213. Plaintiff Audrey Jenkins is a resident of Andrews, North Carolina.
- 14 214. Plaintiff Margaret Jenkins is a resident of Sikeston, Missouri.
- 15 215. Plaintiff Mary Jennedy is a resident of Ironton, Ohio.
- 16 216. Plaintiff Wilma Johner is a resident of Gillette, Wyoming.
- 17 217. Plaintiff Antonette Johnson is a resident of Santee, California.
- 18 218. Plaintiff Ellis Johnson is a resident of Portsmouth, Virginia.
- 19 219. Plaintiff Paula Johnson is a resident Doniphan, Missouri.
- 20 220. Plaintiff Rose Johnson is a resident of St. Petersburg, Florida.
- 21 221. Plaintiff Gary Johnston is a resident of Melbourne, Texas.
- 22 222. Plaintiff Catenia Jones is a resident of Marshall, Texas.
- 23 223. Plaintiff Glenda Jones is a resident of Clinton, Tennessee.
- 24 224. Plaintiff Joanne Jones is a resident of Cumberland, North Carolina.

- 1 225. Plaintiff Laurie Jones is a resident of Blytheville, Arkansas.
- 2 226. Plaintiff Wanda Jones is a resident of Town Creek, Alabama.
- 3 227. Plaintiff Leatrice Joy-Baird is a resident of Chattanooga, Tennessee.
- 4 228. Plaintiff Lois Karhinen is a resident of Queensbury, New York.
- 5 229. Plaintiff Edward Kasinger is a resident of Evansville, Indiana.
- 6 230. Plaintiff Delores Keller is a resident of Bunkie, Louisiana.
- 7 231. Plaintiff Pegger Kezer is a resident of Montgomery, Alabama.
- 8 232. Plaintiff Che King is a resident of Fresno, California.
- 9 233. Plaintiff Sandria King is a resident of Suffolk, Virginia.
- 10 234. Plaintiff LaTanya Klisus is a resident of Largo, Florida.
- 11 235. Plaintiff Hollis Knaak is a resident of Arkadelphia, Arkansas.
- 12 236. Plaintiff Lucy Kochman is a resident of Albrightsville, Pennsylvania.
- 13 237. Plaintiff Richard Kowalski is a resident of Independence, Ohio.
- 14 238. Plaintiff Libbie Kuehler is a resident of Levelland, Texas.
- 15 239. Plaintiff Esther Kurtz is a resident of Monticello, Arkansas.
- 16 240. Plaintiff Marc Kurtz is a resident of Colorado Springs, Colorado.
- 17 241. Plaintiff Maria Kustanovich is a resident of Brooklyn, New York.
- 18 242. Plaintiff Leonard Kushnell is a resident of Miami Beach, Florida.
- 19 243. Plaintiff Kristine Lachut is a resident of Osegatchie, New York.
- 20 244. Plaintiff James Landry is a resident of Traverse City, Michigan.
- 21 245. Plaintiff Jeanette Landry is a resident of Beaumont, Texas.
- 22 246. Plaintiff Michael Lapetina is a resident of Sellersville, Pennsylvania.
- 23 247. Plaintiff Terry Large is a resident of Durrant, Mississippi.
- 24 248. Plaintiff Donna L. Lavezzare is a resident of Oakwood Village, Ohio.

- 1 249. Plaintiff Kendra Law is a resident of Thomasville, Georgia.
- 2 250. Plaintiff Lucille Leach is a resident of Hohenwald, Tennessee.
- 3 251. Plaintiff Mary Kay LeBlanc is a resident of Jasper, Texas.
- 4 252. Plaintiff Karen Lee is a resident of Cibolo, Texas.
- 5 253. Plaintiff Zola Lee is a resident of New Albany, Indiana.
- 6 254. Plaintiff Gina Legge is a resident of Azle, Texas.
- 7 255. Plaintiff Sheila Leiba is a resident of Lafayette, Alabama
- 8 256. Plaintiff Donna Lemay is a resident of Winter Haven, Florida.
- 9 257. Plaintiff Lorraine Lewis is a resident of Mays Landing, New Jersey.
- 10 258. Plaintiff Justin Lindquist is a resident of Pawleys Island, South Carolina.
- 11 259. Plaintiff Karen Liss is a resident of Ocala, Florida.
- 12 260. Plaintiff Mary Little is a resident of Montezuma, Georgia.
- 13 261. Plaintiff Faith Lockee is a resident of Seneca, South Carolina.
- 14 262. Plaintiff Vicky Looney is a resident of Bluefield, Virginia.
- 15 263. Plaintiff Laura Lovas is a resident of Orlando, Florida.
- 16 264. Plaintiff Robert Lucas is a resident of Lucedale, Mississippi.
- 17 265. Plaintiff Herman Lucero is a resident of Trinidad, Colorado.
- 18 266. Plaintiff Pamela Maddox is a resident of Granger, Indiana.
- 19 267. Plaintiff Virginia Mair is a resident of Kingsland, Texas.
- 20 268. Plaintiff Nicholas Mancini is a resident of Philadelphia, Pennsylvania.
- 21 269. Plaintiff Rowena Mangum is a resident of Williamsville, Virginia.
- 22 270. Plaintiff Bivia Martin is a resident of Topeka Kansas.
- 23 271. Plaintiff Carolyn Martin is a resident of Clearwater, Florida.
- 24 272. Plaintiff David Martin is a resident of Walton, Kentucky.

- 1 273. Plaintiff James Martin is a resident of Santa Fe, Texas.
- 2 274. Plaintiff Joanne Martin is a resident of Kansas City, Missouri.
- 3 275. Plaintiff Mary Martin is a resident of Villa Rica, Georgia.
- 4 276. Plaintiff Tabitha Martin is a resident of Redfield, Arkansas.
- 5 277. Plaintiff Tammy Martin is a resident of Princeton, West Virginia.
- 6 278. Plaintiff Delores Martinez is a resident of Roswell, New Mexico.
- 7 279. Plaintiff Isabel Martinez is a resident of Opa Locka, Florida.
- 8 280. Plaintiff Alan Maughan is a resident of Georgetown, Texas.
- 9 281. Plaintiff H. V. "Hank" Maupin, Jr. is a resident of Las Cruces, New Mexico.
- 10 282. Plaintiff Jill May is a resident of Palmyra, Virginia.
- 11 283. Plaintiff Theresa Mayabb is a resident of Oklahoma City, Oklahoma.
- 12 284. Plaintiff Catherine McClain is a resident of Jacksonville, North Carolina.
- 13 285. Plaintiff Betty McCrorey is a resident of Ridgeway, South Carolina.
- 14 286. Plaintiff Margaret McDonald is a resident of Valdosta, Georgia.
- 15 287. Plaintiff Shirley McGill is a resident of Heidelberg, Mississippi.
- 16 288. Plaintiff Eric McKellips, individually and as next friend of Kali Grace McKellips a
17 minor, is a resident of Ramsey, Minnesota.
- 18 289. Plaintiff Alice McManus is a resident of Pierce City, Missouri.
- 19 290. Plaintiff Sarah Trilby McPhail is a resident of Calhoun City, Mississippi.
- 20 291. Plaintiff Teddy Meadows is a resident of Iaeger, West Virginia.
- 21 292. Plaintiff Virginia Means is a resident of Jefferson, Ohio.
- 22 293. Plaintiff The Estate of Constance Meeks is a resident of Springfield, Missouri.
- 23 294. Plaintiff Robert Meredith is a resident of Monticello, Minnesota.
- 24 295. Plaintiff Nora Lee Mersino is a resident of Powell, Tennessee.

- 1 296. Plaintiff James Messer is a resident of Granite Falls, North Carolina.
- 2 297. Plaintiff Sheila Middleton is a resident of Harlan, Kentucky.
- 3 298. Plaintiff Mae Miles is a resident of Mobile, Alabama.
- 4 299. Plaintiff Marion Mitchell is a resident of Sweetwater, Alabama.
- 5 300. Plaintiff Sam Mitchell is a resident of Houston, Texas.
- 6 301. Plaintiff Helen Moore is a resident of Brenham, Texas.
- 7 302. Plaintiff Jim More is a resident of West Valley City, Utah.
- 8 303. Plaintiff Barbara Morris is a resident of El Dorado, Arkansas.
- 9 304. Plaintiff Janice Morris is a resident of Anniston, Alabama.
- 10 305. Plaintiff Scott Morse, individually and as next friend of Jessica Morse, a minor, is a
11 resident of Hope, Arkansas.
- 12 306. Plaintiff John Moulton is a resident of Yukon, Oklahoma.
- 13 307. Plaintiff Martha Mullins is a resident of Conway, Arkansas.
- 14 308. Plaintiff Mary Mullins is a resident of Welch, West Virginia.
- 15 309. Plaintiff Amy Mundhenk is a resident of Centerville, Ohio.
- 16 310. Plaintiff Ronnie Murray is a resident of Bedford, Kentucky.
- 17 311. Plaintiff Patricia Murrell is a resident of Lake Wales, Florida.
- 18 312. Plaintiff Dorothy Musick is a resident of Crockett, Texas.
- 19 313. Plaintiff Rochelle Navarro is a resident of Los Angeles, California.
- 20 314. Plaintiff Robert Nelson is a resident of Naples, Florida.
- 21 315. Plaintiff Emma Nichols is a resident of Greenville, Mississippi.
- 22 316. Plaintiff Roxanne Nichols is a resident of Columbia, Missouri.
- 23 317. Plaintiff Judith Nicholson is a resident of Pinellas Park, Florida.
- 24 318. Plaintiff Vera Nickens is a resident of Fulton, Missouri.

- 1 319. Plaintiff Lois Niemann is a resident of Kenner, Louisiana.
- 2 320. Plaintiff Buster Norden is a resident of Springville, Tennessee.
- 3 321. Plaintiff Randall Norden is a resident of Springville, Tennessee.
- 4 322. Plaintiff Margaret Oliver is a resident of Beggs, Oklahoma.
- 5 323. Plaintiff Beverly Otto is a resident of Anacoco, Louisiana.
- 6 324. Plaintiff Peggy Oxendine is a resident of Lumberton, North Carolina.
- 7 325. Plaintiff Kathy Paaaina is a resident of Waianae, Hawaii.
- 8 326. Plaintiff Milagros Padilla is a resident of New York, New York.
- 9 327. Plaintiff Frankie Palmer is a resident of Denning, Arkansas.
- 10 328. Plaintiff Maria Pantoja is a resident of San Antonio, Texas.
- 11 329. Plaintiff Phyliss Pargeon is a resident of Vandalia, Missouri.
- 12 330. Plaintiff Margaret Parker is a resident of Folkston, Georgia.
- 13 331. Plaintiff Sandra Parker is a resident of Douglas, Georgia.
- 14 332. Plaintiff Pearl Partlow is a resident of Ozark, Alabama.
- 15 333. Plaintiff Chris Patterson is a resident of Ruston, Louisiana.
- 16 334. Plaintiff Debra Pedraza is a resident of Bakersfield, California.
- 17 335. Plaintiff Robert Peevely is a resident of Speedwell, Tennessee.
- 18 336. Plaintiff Patsy Perkins is a resident of Coleman, Texas.
- 19 337. Plaintiff Mary Perry is a resident of Tuscon, Arizona.
- 20 338. Plaintiff Gary Peterson is a resident of Ogden, Utah.
- 21 339. Plaintiff Pamela Pettry is a resident of Oak Mill, West Virginia.
- 22 340. Plaintiff Suzanne Pettway is a resident of Montgomery, Alabama.
- 23 341. Plaintiff Katherine Phipps is a resident of Kernersville, North Carolina.
- 24 342. Plaintiff Shirley Pierce is a resident of Clearwater, Florida.

- 1 343. Plaintiff Edwin Polhemus is a resident of Mauston, Wisconsin.
- 2 344. Plaintiff Kevin Potter is a resident of Lexington, Kentucky.
- 3 345. Plaintiff Carolyn Powell is a resident of Thomaston, Georgia.
- 4 346. Plaintiff Karen Prestegard is a resident of Anchorage, Alaska.
- 5 347. Plaintiff Louise Price is a resident of Perris, California.
- 6 348. Plaintiff Rosemary Puckett is a resident of Latham, New York.
- 7 349. Plaintiff Brunell Raine is a resident of Mobile, Alabama.
- 8 350. Plaintiff Myra Ramsey is a resident of Cleveland, Ohio.
- 9 351. Plaintiff Patricia Ratlick is a resident of Niagara, Wisconsin.
- 10 352. Plaintiff Kitty Ray is a resident of Harrisville, West Virginia.
- 11 353. Plaintiff Bridgette Redmond is a resident of Jennings, Louisiana.
- 12 354. Plaintiff Martha Reed is a resident of Hinton, West Virginia.
- 13 355. Plaintiff Rebecca Reed is a resident of Campbellsville, Kentucky.
- 14 356. Plaintiff William Reed is a resident of Dayton, Texas.
- 15 357. Plaintiff Janet Reliford is a resident of Magnolia, Arkansas.
- 16 358. Plaintiff Elicia Reneau is a resident of Dallas, Texas.
- 17 359. Plaintiff Esther Reyes is a resident of Tampa, Florida.
- 18 360. Plaintiff Nathine Rhodes is a resident of Evening Shade, Arkansas.
- 19 361. Plaintiff Meredith Rice, individually and as next friend of Izaiyah Rice, a minor, is a
20 resident of Harrah, Oklahoma.
- 21 362. Plaintiff Diana L. Richards is a resident of Sewell, New Jersey.
- 22 363. Plaintiff Wincodell Richardson is a resident of Dallas, Texas.
- 23 364. Plaintiff Ranada Dawn Riley is a resident of Lexington, Kentucky.
- 24 365. Plaintiff Michael Robbins is a resident of Bayou La Batre, Alabama.

- 1 366. Plaintiff Rosie Robbins is a resident of Bayou La Batre, Alabama.
- 2 367. Plaintiff Pamalla Roberts is a resident of Lakewood, Ohio.
- 3 368. Plaintiff Tina Roberts is a resident of Surgoinsville, Tennessee.
- 4 369. Plaintiff Carolyn Robinson is a resident of Katy, Texas.
- 5 370. Plaintiff Janice Robertson is a resident of Bishopville, South Carolina.
- 6 371. Plaintiff Sherryl Robinson is a resident of Vancouver, Washington.
- 7 372. Plaintiff Veta Robinson is a resident of Chickasha, Oklahoma.
- 8 373. Plaintiff Bobby Roby is a resident of Bardstown, Kentucky.
- 9 374. Plaintiff Jeri Rocha is a resident of Ardmore, Oklahoma.
- 10 375. Plaintiff Barbara Rogers is a resident of Philadelphia, Pennsylvania.
- 11 376. Plaintiff Ted P. Rollins is a resident of Fort Pierce, Florida.
- 12 377. Plaintiff Willie Roy is a resident of Las Vegas, Nevada.
- 13 378. Plaintiff Elizabeth Rozzo is a resident of Delray, Florida.
- 14 379. Plaintiff Maria Ruiz is a resident of Texas City, Texas.
- 15 380. Plaintiff Leon Russell is a resident of Marlton, New Jersey.
- 16 381. Plaintiff Tom Ryant is a resident of Victoria, Virginia.
- 17 382. Plaintiff Tina Sachse is a resident of Hurst, Texas.
- 18 383. Plaintiff Henrietta Salazar is a resident of Uvalde, Texas.
- 19 384. Plaintiff Rachel Salyers is a resident of Jolo, West Virginia.
- 20 385. Plaintiff Lola Sampson is a resident of Bastrop, Louisiana.
- 21 386. Plaintiff Loraine Sanders is a resident of Cordele, Georgia.
- 22 387. Plaintiff Rosemarie Sanders is a resident of Shreveport, Louisiana.
- 23 388. Plaintiff Frankie Sangster is a resident of Hope Mills, North Carolina.
- 24 389. Plaintiff Shirley Sansom is a resident of Murchison, Texas.

- 1 390. Plaintiff Jo Ann Santiago is a resident of Spring Hill, Florida.
- 2 391. Plaintiff Melody Sarensen is a resident of Royalton, Illinois.
- 3 392. Plaintiff Winston Savage is a resident of League City, Texas.
- 4 393. Plaintiff John Scaltrito is a resident of Morton, Pennsylvania.
- 5 394. Plaintiff Jeffrey Schnapper is a resident of Valley Stream, New York.
- 6 395. Plaintiff Patricia Schultz is a resident of Spring, Texas.
- 7 396. Plaintiff Donna Schulz is a resident of Kendall Park, New Jersey.
- 8 397. Plaintiff Roy Seleska is a resident of Wimauma, Florida.
- 9 398. Plaintiff Jerry Sewell is a resident of Oxford, Alabama.
- 10 399. Plaintiff Roberta Shaw is a resident of Trinchera, Colorado.
- 11 400. Plaintiff Fannie Shinault is a resident of Blue Field, West Virginia.
- 12 401. Plaintiff Ronnie Shook is a resident of Glen Allen, Virginia.
- 13 402. Plaintiff James W. Sier, Sr. is a resident of Frederick, Maryland.
- 14 403. Plaintiff Rycia Silverstein is a resident of Radlett, Hertfordshire, UK.
- 15 404. Plaintiff Sherry Simmons is a resident of Lester, West Virginia.
- 16 405. Plaintiff Calvin Smith is a resident of Texas City, Texas.
- 17 406. Plaintiff Larry Smith is a resident of McCalla, Alabama.
- 18 407. Plaintiff Mary Ann Smith is a resident of Gaines, Michigan.
- 19 408. Plaintiff Shirley Smith is a resident of Jena, Louisiana.
- 20 409. Plaintiff Tresa Smith is a resident of Machinaw, Illinois.
- 21 410. Plaintiff Vickie Smith is a resident of Warren, Arkansas.
- 22 411. Plaintiff Darrell Smithwick is a resident of Lawrenceville, Georgia.
- 23 412. Plaintiff John Snyder is a resident of Bushkill, Pennsylvania.
- 24 413. Plaintiff William Standley is a resident of Carrollton, Missouri.

- 1 414. Plaintiff Carol Jean Stanley is a resident of Waco, Texas.
- 2 415. Plaintiff Kathleen Stiles is a resident of Jacksonville, Florida.
- 3 416. Plaintiff Karen Strausbaugh is a resident of Tiffin, Ohio.
- 4 417. Plaintiff Mary Strickland is a resident of Memphis, Tennessee.
- 5 418. Plaintiff Cheryl Sullins is a resident of Marion, Illinois.
- 6 419. Plaintiff Judy Surber is a resident of Ashdown, Arkansas.
- 7 420. Plaintiff Virginia Sutak is a resident of Follansbee, West Virginia.
- 8 421. Plaintiff Rita Svonabec is a resident of Beckley, West Virginia.
- 9 422. Plaintiff Florence Swanger is a resident of Lewisburg, Ohio.
- 10 423. Plaintiff Judy Sykes is a resident of Jonesboro, Arkansas.
- 11 424. Plaintiff Margaret Tande is a resident of Blackshear, Georgia.
- 12 425. Plaintiff Juanita Tatum is a resident of Longview, Texas.
- 13 426. Plaintiff Pauline Tatum is a resident of Longview, Texas.
- 14 427. Plaintiff Serena Tavaréz is a resident of Galveston, Texas.
- 15 428. Plaintiff Brenda Teague is a resident of Kalamazoo, Michigan.
- 16 429. Plaintiff Carol Tempany is a resident of Belton, Texas.
- 17 430. Plaintiff Hattie Tennison is a resident of Greenville, Texas.
- 18 431. Plaintiff Troy Terrell is a resident of Texas City, Texas.
- 19 432. Plaintiff May Joyce Terry is a resident of Dallas, Texas.
- 20 433. Plaintiff Daniel Thomas is a resident of Westland, Michigan.
- 21 434. Plaintiff Gloria Thomas is a resident of Jonesboro, Arkansas.
- 22 435. Plaintiff Melissa Thomas is a resident of Florence, Oregon.
- 23 436. Plaintiff Shirley Thomas is a resident of Inkster, Michigan.
- 24 437. Plaintiff Ella Thompson is a resident of Reddick, Florida.

- 1 438. Plaintiff James Thompson is a resident of Opp, Alabama.
- 2 439. Plaintiff Jennell Thompson is a resident of Texas City, Texas.
- 3 440. Plaintiff Patricia Thompson is a resident of Smith, Alabama.
- 4 441. Plaintiff Victor Thornton is a resident of Carrollton, Virginia.
- 5 442. Plaintiff Anthony Tomlin is a resident of Russellville, Ohio.
- 6 443. Plaintiff Elsie Toney is a resident of Elizabethtown, Kentucky.
- 7 444. Plaintiff Barry Tuer, Sr. is a resident of Dearborn Heights, Michigan.
- 8 445. Plaintiff Patsy Tuten is a resident of Paragould, Arkansas.
- 9 446. Plaintiff Debbie Underwood is a resident of Ogden, Utah.
- 10 447. Plaintiff Eva VanVleet is a resident of Portland, Oregon.
- 11 448. Plaintiff Kathurn Veino is a resident of Middletown, Ohio.
- 12 449. Plaintiff Kenneth Vinson is a resident of Wilmington, North Carolina.
- 13 450. Plaintiff Wilda Jean Waggle is a resident of Garden Ridge, Texas.
- 14 451. Plaintiff Barbara Wagner is a resident of Taylor, Michigan.
- 15 452. Plaintiff Terry Walbaum is a resident of Broken Arrow, Oklahoma.
- 16 453. Plaintiff Erma Walker is a resident of Welsh, Louisiana.
- 17 454. Plaintiff Irma Walker is a resident of Alexandria, Louisiana.
- 18 455. Plaintiff Mary Walker is a resident of Forrest City, Arkansas.
- 19 456. Plaintiff Venita Walker is a resident of Richmond, Virginia.
- 20 457. Plaintiff Gwendolyne Wamsley is a resident of Arlington, Texas.
- 21 458. Plaintiff Debbie Ward is a resident of Missoula, Montana.
- 22 459. Plaintiff Lajeane Ward is a resident of Pisgah Forest, North Carolina.
- 23 460. Plaintiff Gregory Washington is a resident of Richardson, Texas.
- 24 461. Plaintiff Margie Washington is a resident of Missouri City, Texas.

- 1 462. Plaintiff Stephen Watermeier is a resident of Carmel, Indiana.
- 2 463. Plaintiff Patricia Watkins is a resident of Las Vegas, Nevada.
- 3 464. Plaintiff Tina Watkins is a resident of Cape Coral, Florida.
- 4 465. Plaintiff Ruby Watson is a resident of Kansas City, Missouri.
- 5 466. Plaintiff Gina Wax is a resident of Coral Springs, Florida.
- 6 467. Plaintiff Catherine Weatherstone is a resident of Villas, New Jersey.
- 7 468. Plaintiff Ryva Webb is a resident of Kingwood, Texas.
- 8 469. Plaintiff Vernice Webster is a resident of Michie, Tennessee.
- 9 470. Plaintiff Barbara Wegman is a resident of Pearland, Texas.
- 10 471. Plaintiff Ronald Werts is a resident of Miamisburg, Ohio.
- 11 472. Plaintiff Elizabeth Wery is a resident of Dallas, North Carolina.
- 12 473. Plaintiff Cheri Wesloh is a resident of San Antonio, Texas.
- 13 474. Plaintiff Gary Westmorlan is a resident of Hornersville, Missouri.
- 14 475. Plaintiff Lanitra White is a resident of Miami Gardens, Florida.
- 15 476. Plaintiff Lora White is a resident of Greenwood, Mississippi.
- 16 477. Plaintiff Reba Whitehurst is a resident of Wewahitchka, Florida.
- 17 478. Plaintiff Barbra Whitmer is a resident of Valley, Alabama.
- 18 479. Plaintiff Evelyn Whittenburg is a resident of Temple, Texas.
- 19 480. Plaintiff Brinda Williams is a resident of Marshall, Texas.
- 20 481. Plaintiff Carolyn Williams is a resident of New York, New York.
- 21 482. Plaintiff Denise Williams is a resident of Jacksonville, Florida.
- 22 483. Plaintiff Geraldine Williams is a resident of Chandler, Arizona.
- 23 484. Plaintiff Geri Williams is a resident of San Antonio, Texas.
- 24 485. Plaintiff Helen Williams is a resident of Texarkana, Texas.

- 1 486. Plaintiff Juanita Williams is a resident of Houston, Texas.
- 2 487. Plaintiff Leonard Williams is a resident of Carthage, Texas.
- 3 488. Plaintiff Linda Williams is a resident of Bastrop, Texas.
- 4 489. Plaintiff Neal Williams is a resident of Madison Wisconsin.
- 5 490. Plaintiff Ruthell Williams is a resident of Birmingham, Alabama.
- 6 491. Plaintiff Dawne Williford is a resident of Las Vegas, Nevada.
- 7 492. Plaintiff Danny Willing is a resident of Monette, Arkansas.
- 8 493. Plaintiff Calvin Willis is a resident of Talladega, Alabama.
- 9 494. Plaintiff Emily Wilson is a resident of Stuttgart, Arkansas.
- 10 495. Plaintiff Georgette Wilson is a resident of Aberdeen, Ohio.
- 11 496. Plaintiff Peter Wilson is a resident of Pulaski, Tennessee.
- 12 497. Plaintiff Vicki Winkler is a resident of Phoenix, Arizona.
- 13 498. Plaintiff Claudette Wiren is a resident of Dawson, Alabama.
- 14 499. Plaintiff Carla Witt is a resident of Palmer, Texas.
- 15 500. Plaintiff Mary Kay Wodyga is a resident of LaGrange, Georgia.
- 16 501. Plaintiff Laverne Wolf is a resident of Barberton, Ohio.
- 17 502. Plaintiff Matthew Wooden is a resident of Marianna, Florida.
- 18 503. Plaintiff Jami Woodham is a resident of Gulfport, Mississippi.
- 19 504. Plaintiff John Woods is a resident of Texas City, Texas.
- 20 505. Plaintiff John Worley, Sr. is a resident of Bluefield, West Virginia.
- 21 506. Plaintiff Joe Wright is a resident of Greenville, Mississippi.
- 22 507. Plaintiff Kimberly Wright is a resident of Sutton, West Virginia.
- 23 508. Plaintiff Shirley Wright is a resident of Clarksville, Tennessee.
- 24 509. Plaintiff Brenda Yarnell is a resident of Chickasha, Oklahoma.

1 510. Plaintiff Linda Youmans is a resident of Savannah, Georgia.

2 511. Plaintiff Sara J. Youngblood is a resident of Chickasha, Oklahoma.

3 512. Plaintiff Carol Zafiris is a resident of Goodyear, Arizona.

4 513. Defendant ASTRAZENECA PHARMACEUTICALS LP (AZPHARM) is, and at all
5 times relevant to this action was, a Delaware corporation with its corporate headquarters in
6 Wilmington, Delaware. AZPHARM is, and at all times relevant to this action was, registered to do
7 business in California with the California Secretary of State.

8 514. Defendant ASTRAZENECA LP (AZLP) is, and at all times relevant to this action was, a
9 Delaware corporation. AZLP is, and at all times relevant to this action was, registered to do business in
10 California with the California Secretary of State. AZLP is the holder of approved New Drug
11 Applications (NDAs) 21-153 and 21-154 for Nexium (esomeprazole magnesium), and it manufactures
12 and markets Nexium (esomeprazole magnesium) in the United States.

13 515. Defendants ASTRAZENCA PHARMACEUTICALS LP and ASTRAZENCA LP will
14 be referred to together hereafter as “AstraZeneca.”

15 516. Plaintiffs are informed and believe and thereon allege that at all times mentioned, each
16 Defendant was the agent and employee of each other Defendant, and in doing the things alleged was
17 acting within the course and scope of such agency and employment and with each other Defendant’s
18 actual and implied permission, consent, authorization, and approval.

19 517. At all times relevant hereto, AstraZeneca was engaged in the business of developing,
20 designing, licensing, manufacturing, distributing, selling, marketing, and introducing the proton pump
21 inhibitor drug Nexium into interstate commerce throughout the United States, including the State of
22 California and every other state, either directly or indirectly through third parties, subsidiaries, or other
23 related entities.

24 ///

1 518. Plaintiffs and each of them have ingested Nexium as a direct and proximate result of
2 AstraZeneca's development, design, licensure, manufacture, distribution, sale, and marketing of
3 Nexium throughout the United States, including but not limited to the state of California.

4 519. As a further direct and proximate result of their ingestion of Nexium, Plaintiffs have
5 suffered severe injuries to their persons, including, but not limited to, the development of bone
6 deterioration, osteoporosis, and fractures, which have caused them to incur substantial damages.

7 **NEXIUM**

8 520. AstraZeneca sold Nexium with National Drug Code (NDC) numbers 0186-5020, 0186-
9 5022, 0186-5040, 0186-5042, 0186-40100186-4020, and 0186-4040.

10 521. Nexium (esomeprazole magnesium) is a prescription proton pump inhibitor (PPI) that
11 works by reducing hydrochloric acid in the stomach.

12 522. The current FDA-approved indications for Nexium are as follows:

13 **Treatment of Gastroesophageal Reflux Disease (GERD)**

14 NEXIUM is indicated for the short-term treatment (4 to 8 weeks) in the healing and
15 symptomatic resolution of diagnostically confirmed erosive esophagitis. For those
16 patients who have not healed after 4 to 8 weeks of treatment, an additional 4 to 8 week
17 course of NEXIUM may be considered. In infants 1 month to less than 1 year, NEXIUM
18 is indicated for short-term treatment (up to 6 weeks) of erosive esophagitis due to acid-
19 mediated GERD.

17 ***Maintenance of Healing of Erosive Esophagitis***

18 NEXIUM is indicated to maintain symptom resolution and healing of erosive
19 esophagitis. Controlled studies do not extend beyond 6 months.

19 ***Symptomatic Gastroesophageal Reflux Disease***

20 NEXIUM is indicated for short-term treatment (4 to 8 weeks) of heartburn and other
21 symptoms associated with GERD in adults and children 1 year or older.

21 ...

22 **Risk Reduction of NSAID-Associated Gastric Ulcer**

23 NEXIUM is indicated for the reduction in the occurrence of gastric ulcers associated
24 with continuous NSAID therapy in patients at risk for developing gastric ulcers. Patients
are considered to be at risk due to their age (≥ 60) and/or documented history of gastric
ulcers. Controlled studies do not extend beyond 6 months.

1 ...

2 **H. pylori Eradication to Reduce the Risk of Duodenal Ulcer Recurrence**

3 Triple Therapy (NEXIUM plus amoxicillin and clarithromycin): NEXIUM, in
4 combination with amoxicillin and clarithromycin, is indicated for the treatment of
5 patients with *H. pylori* infection and duodenal ulcer disease (active or history of within
6 the past 5 years) to eradicate *H. pylori*. Eradication of *H. pylori* has been shown to
7 reduce the risk of duodenal ulcer recurrence[].

8 ...

9 **Pathological Hypersecretory Conditions Including Zollinger-Ellison Syndrome**

10 NEXIUM is indicated for the long-term treatment of pathological hypersecretory
11 conditions, including Zollinger-Ellison Syndrome.

12 523. During the period in which Nexium has been sold in the United States, hundreds of
13 reports of injury have been submitted to the FDA in association with ingestion of Nexium and other
14 PPIs.

15 524. As early as 2006, studies had indicated that PPI drugs, by reducing the amount of
16 hydrochloric acid in the stomach, interfere with the absorption of calcium and magnesium, which
17 causes bone deterioration, decreased bone density, and leads to severe fractures. Numerous studies have
18 found that the risk of fracture is significantly increased for those patients over fifty (50) years of age
19 who took a prescription-strength PPI like Nexium, or who took any PPI regularly for more than one (1)
20 year. Specifically, the use of PPIs increases the risk of fractures in women up to 34 percent.
21 AstraZeneca was aware of the foregoing studies and risks prior to 2006.

22 525. On May 25, 2010, the FDA mandated that manufacturers of PPIs, including
23 AstraZeneca, include safety information and warnings about the increased risk of osteoporosis and
24 fractures associated with PPI use.

 526. On March 22, 2011, the FDA issued a safety alert warning that the use of prescription
 PPIs, including Nexium, results in an increased risk of fractures.

///

1 527. AstraZeneca knew or should have known about the correlation between the use of
2 Nexium and the significantly increased risk of bone density loss, osteoporosis, and fractures.

3 528. Nexium is AstraZeneca's largest-selling drug and, in the world market, the third largest-
4 selling drug overall. In 2005, AstraZeneca's sales of Nexium exceeded \$5.7 billion dollars. In 2008,
5 Nexium sales exceeded \$5.2 billion dollars. Despite clear knowledge that Nexium causes bones to
6 deteriorate and break, AstraZeneca continued to market and sell Nexium without warning consumers or
7 healthcare providers of the significant risks of bone deterioration and fractures.

8 529. Plaintiffs all consumed Nexium at various points in time and have been diagnosed with
9 various problems, including but not limited to the development of bone deterioration, osteoporosis, and
10 fractures.

11 530. Plaintiffs were not and could not reasonably have been aware of these adverse effects of
12 taking Nexium until sometime after the FDA issued its first warning on May 25, 2010.

13 **FIRST CLAIM FOR NEGLIGENCE**
14 (All PLAINTIFFS against All DEFENDANTS)

15 531. Plaintiffs re-allege and incorporate by reference paragraphs 1-530 as if they were set
16 forth here in full.

17 532. AstraZeneca owed various duties to Plaintiffs, foreseeable users of AstraZeneca's
18 product, including using due care in the development, design, licensure, manufacture, labeling,
19 distribution, sale, and marketing of Nexium.

20 533. AstraZeneca breached these duties and were negligent by (a) failing to use ordinary care
21 in manufacturing a safe product for the ultimate user; (b) failing to inspect, supervise, and/or carry out
22 health and safety inspections of Nexium; (c) failing to adequately warn foreseeable ultimate users of
23 potentially harmful side effects associated with their product, including but not limited to the risk of
24 developing bone degeneration, osteoporosis, and/or severe fractures; (d) failing to use ordinary care in

1 labeling and selling a safe product to the ultimate user; and (e) failing to adequately advise foreseeable
2 ultimate users on how to properly use Nexium.

3 534. AstraZeneca's acts and omissions directly and proximately caused Plaintiffs' injuries
4 and damages, as described above in more detail.

5 **SECOND CLAIM FOR NEGLIGENT MISREPRESENTATION**
6 (All PLAINTIFFS against All DEFENDANTS)

7 535. Plaintiffs re-allege and incorporate by reference paragraphs 1-534 as if they were set
8 forth here in full.

9 536. AstraZeneca, in the course and scope of its business, made representations and supplied
10 false or misleading information to Plaintiffs for the purpose of inducing Plaintiffs to purchase and use
11 Nexium.

12 ///

13 537. AstraZeneca failed to exercise reasonable care and competence in obtaining and
14 communicating information to Plaintiffs by: (a) failing to properly disclose the harmful side effects of
15 the Nexium that was sold to Plaintiffs, including but not limited to the risk of developing bone
16 degeneration, osteoporosis, and/or severe fractures; (b) failing to adequately and properly explain the
17 proper instructions, procedures, and protocol for taking Nexium; and (c) failing to disclose to
18 healthcare professionals and patients the clinical evidence, approved indications, and product safety
19 profiles regarding Nexium, as described above in paragraphs 520-526.

20 538. Plaintiffs justifiably relied on representations made by AstraZeneca.

21 539. Plaintiffs' injuries and damages were a direct and proximate result of their justifiable
22 reliance on AstraZeneca's negligent misrepresentations.

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THIRD CLAIM FOR FRAUD
(All PLAINTIFFS against All DEFENDANTS)

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3 540. Plaintiffs re-allege and incorporate by reference paragraphs 1-539 as if they were set
4 forth here in full.

5 541. AstraZeneca heavily marketed Nexium in the United States by engaging in an extensive
6 advertising and marketing campaign designed to increase sales of Nexium.

7 542. In so doing, AstraZeneca made material false representations and omissions as to the
8 side effects, adverse effects, and overall safety of Nexium, including material false representations and
9 omissions concerning the risk of developing bone degeneration, osteoporosis, and/or severe fractures,
10 despite knowledge that studies had made findings contrary to and concerning these representations and
11 omissions.

12 543. Defendants intentionally and recklessly misrepresented that Nexium was a safe product
13 by making affirmative representations and omitting material information concerning its safety risks,
14 including but not limited to the risk of developing bone degeneration, osteoporosis, and/or severe
15 fractures, with knowledge of the falsity or in conscious disregard of the truth or falsity of the
16 affirmative representations, and with knowledge of the materiality of the omissions or in conscious
17 disregard of the materiality of the omissions.

18 544. These misrepresentations and omissions were made with the specific purpose and intent
19 to induce Plaintiffs and those like them to purchase and consume Nexium. AstraZeneca knew or had
20 reason to expect that Plaintiffs would act in reliance on its misrepresentations.

21 545. Plaintiffs suffered injuries and damages as a direct and proximate cause of their reliance
22 on AstraZeneca's fraudulent misrepresentations.

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CLAIM FOR PRODUCT DEFECT
(All PLAINTIFFS against All DEFENDANTS)

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3 546. Plaintiffs re-allege and incorporate by reference paragraphs 1-545 as if they were set
4 forth here in full.

5 547. AstraZeneca defectively designed, manufactured, and marketed Nexium. AstraZeneca
6 also failed to adequately warn foreseeable consumers of the safety risks associated with ingestion of
7 Nexium, including but not limited to the risk of developing bone degeneration, osteoporosis, and/or
8 severe fractures.

9 548. Such defects and inadequate warnings existed at the time AstraZeneca developed,
10 designed, licensed, manufactured, distributed, sold, and marketed Nexium to Plaintiffs.

11 549. Such defects and inadequate warnings rendered Nexium unreasonably dangerous for its
12 intended and foreseeable use, including its use by Plaintiffs.

13 550. Plaintiffs would not have taken Nexium or would have taken less Nexium had they been
14 adequately warned of its potential side effects, including but not limited to the risk of developing bone
15 degeneration, osteoporosis, and/or severe fractures.

16 551. Plaintiffs suffered injuries and damages as a direct and proximate result of
17 AstraZeneca's design, manufacturing, and marketing defects, as well as its inadequate warnings.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that the Court grant the following relief:

1. General and special damages in an amount to be determined at trial;
2. Punitive damages in an amount to be determined at trial;
3. Costs of suit incurred herein; and
4. Such other and further relief as the Court may deem just and proper.

Respectfully submitted,

Dated: December 31, 2012

JEFFREY A. LAKE, A.P.C.

By: s/ Nathan Shaman
Jeffrey A. Lake, Esq.
Nathan Shaman, Esq.
Attorneys for All Plaintiffs

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.)

I. (a) PLAINTIFFS

See Complaint

(b) County of Residence of First Listed Plaintiff Jackson County, MI (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Jeffrey A. Lake, Esq.; Nathan A. Shaman, Esq. Jeffrey A. Lake, A.P.C. 11650 Iberia Place, Suite 216, San Diego, CA 92128, 858-487-5253

DEFENDANTS

ASTRAZENECA PHARMACEUTICALS LP, a Delaware corporation and ASTRAZENECA LP, a Delaware corporation,

County of Residence of First Listed Defendant New Castle County, DE (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known) 12cv3083-WQH-DHB

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location in various states and foreign countries.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PRISONER PETITIONS, TORTS, PERSONAL INJURY, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

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

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 U.S.C., section 1332

Brief description of cause: Product defect in Nexium.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: X Yes [] No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE DOCKET NUMBER

DATE: 12/31/2012 SIGNATURE OF ATTORNEY OF RECORD: s/ Nathan A. Shaman

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE