

**BEFORE THE UNITED STATES JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

IN RE: SoClean, Inc. Litigation

MDL No. 3021

**DEFENDANT SOCLEAN, INC.'S RESPONSE TO
PLAINTIFFS' MOTION FOR TRANSFER AND COORDINATION
OR CONSOLIDATION PURSANT TO 28 U.S.C. § 1407**

Respectfully submitted,

Nicole A. Eichberger (La. Bar. No. 28032)
PROSKAUER ROSE LLP
650 Poydras Street, Suite 1800
Poydras Center
New Orleans, Louisiana 70130-6146
Tel. 504.310.4088
Fax 504.310.2022
neichberger@proskauer.com

Attorney for SoClean, Inc.

TABLE OF CONTENTS

TABLE OF CONTENTS..... i

TABLE OF AUTHORITIES ii

PRELIMINARY STATEMENT 1

CONCISE STATEMENT OF FACTUAL BACKGROUND..... 1

ARGUMENT 4

 I. ALL PARTIES AGREE THAT TRANSFER AND CONSOLIDATION ARE APPROPRIATE..... 4

 A. The Related Actions Involve Common Factual Questions..... 5

 B. Transfer and Consolidation Will Serve the Convenience of the Parties and Witnesses and Will Promote the Just and Efficient Conduct of Actions..... 6

 C. Additional Reasons Support the Transfer of the Actions to One Court. 7

 II. THE MOST APPROPRIATE FORUM FOR TRANSFER IS A DISTRICT COURT WITHIN THE FIFTH CIRCUIT. 9

 A. A District Court within the Fifth Circuit is the Most Appropriate Forum for Transfer and Coordination or Consolidation..... 10

 B. Movants-Plaintiffs’ Requested Forum is Not an Appropriate Forum for Transfer and Coordination or Consolidation. 11

CONCLUSION..... 12

TABLE OF AUTHORITIES**Cases**

<i>Elam v. Kan. City S. Ry.</i> , 635 F.3d 796 (5th Cir. 2011)	8
<i>Ellis v. Tribune Television Co.</i> , 443 F.3d 71 (2d Cir. 2006).....	8
<i>GCB Commc'ns, Inc. v. U.S. S. Commc'ns, Inc.</i> , 650 F.3d 1257 (9th Cir. 2011)	8
<i>Illinois Municipal Retirement Fund v. Citigroup, Inc.</i> , 391 F.3d 844 (7th Cir. 2004)	4
<i>In re Air Crash Disaster at Huntington, W. Va. on Nov. 14, 1970</i> , 342 F. Supp. 1400 (J.P.M.L. 1972).....	5
<i>In re Fed. Election Campaign Act Litig.</i> , 511 F. Supp. 821 (J.P.M.L. 1979).....	5
<i>In re H & R Block Mortg. Corp. Prescreening Litig.</i> , 435 F. Supp. 2d 1347 (J.P.M.L. 2006).....	4
<i>In re Janus Mutual Funds Inv. Litig.</i> , 310 F. Supp. 2d 1359 (J.P.M.L. 2004).....	10
<i>In re Johnson & Johnson Aerosol Sunscreen Mktg., Sales Practices and Prods. Liab. Litig.</i> , ---F. Supp. 3d---, MDL No. 3015, 2021 WL 4704800 (J.P.M.L Oct. 8, 2021).....	9
<i>In re Lehman Bros. Hldg., Inc.</i> , 598 F. Supp. 2d 1362 (J.P.M.L. 2009).....	6
<i>In re Phenylpropanolamine Prod. Liab. Litig.</i> , 460 F.3d 1217 (9th Cir. 2006)	4
<i>In re Sony Corp. SXRDRear Projection TV Mktg. Sales Practices & Prods. Liab. Litig.</i> , 655 F. Supp. 2d 1367 (J.P.M.L. 2009).....	6
<i>In re Xyrem (Sodium Oxybate) Antitrust Litigation</i> , 509 F. Supp. 3d 1375 (J.P.M.L 2020).....	9
<i>In re Zyprexa Prods. Liab. Litig.</i> , 314 F. Supp. 2d 1380 (J.P.M.L. 2004).....	5
<i>Reid v. Johnson & Johnson & McNeil Nutritionals, LLC</i> , 780 F.3d 952 (9th Cir. 2015)	8
<i>Reiter v. Cooper</i> , 507 U.S. 258, 113 S. Ct. 1213, 122 L. Ed. 2d 604 (1993).....	8
<i>Royster v. Food Lion (In re Food Lion)</i> , 73 F.3d 528 (4th Cir. 1996)	4

United States v. W. Pac. R.R. Co.,
352 U.S. 59, 77 S. Ct. 161, 1 L. Ed. 2d 126 (1956)..... 8

Wal-Mart Stores, Inc. v. Dukes,
564 U.S. 338, 131 S. Ct. 2541, 180 L. Ed. 2d 374 (2011)..... 6

Statutes

28 U.S.C. § 1407..... passim

Rules

Fed. R. Civ. P. 23..... 6

Defendant SoClean, Inc. (“SoClean”), through their undersigned counsel, respectfully submits this response to the motion filed by Movants-Plaintiffs Larry Hunter-Blank and William Wheeler seeking transfer of numerous actions for coordination and consolidation of pretrial proceedings, pursuant to 28 U.S.C. § 1407, to the U.S. District Court for the District of Kansas and, specifically, before the Honorable Holly J. Teeter.

PRELIMINARY STATEMENT

SoClean agrees that the underlying actions should be transferred for coordination and consolidation. SoClean disagrees, however, with Movants-Plaintiffs’ selection of the District of Kansas as an appropriate forum and, in particular, their expressed preference for a specific judge.

A more appropriate forum for consolidation would be a district court in the Fifth Circuit, where the first two actions (and three of the first four) were filed, including the case initiated by Movant-Plaintiff Wheeler. Courts within the Fifth Circuit have extensive experience managing multidistrict litigation. The U.S. District Court for the Eastern District of Louisiana, for example, has managed a significant number of multidistrict litigations and is centrally located in New Orleans, providing a convenient forum for counsel of all parties and the plaintiffs, including the first-filed plaintiffs.

CONCISE STATEMENT OF FACTUAL BACKGROUND

Sleep apnea is a potentially dangerous sleep disorder in which a person’s breathing is interrupted during sleep. People with untreated sleep apnea stop breathing repeatedly during the night, such that the brain and the rest of the body may not get enough oxygen. If left untreated, serious complications may result, including high blood pressure, diabetes, and heart problems.

Continuous positive airway pressure (CPAP) and bi-level positive airway pressure (BiPAP) machines deliver enough air pressure to keep upper airway passages open, thereby

preventing snoring and sleep apnea. The pressurized air is delivered through a mask that seals on the mouth or nose.

SoClean manufactures devices that clean and sanitize CPAP and BiPAP machines used by individuals suffering from sleep apnea or other sleeping disorders. SoClean's products use ozone gas that flows through CPAP and BiPAP equipment and kills germs, bacteria, or viruses it comes into contact with. SoClean's lead product, the SoClean 3.0, is an automated cleaning device that cleans and sanitizes CPAP and BiPAP machines.

On September 3, 2021, two civil actions were filed against SoClean in the Fifth Circuit. Plaintiff Thomas Hebert filed a lawsuit in the U.S. District Court for the Western District of Louisiana, and Plaintiff Anthony Sakalarios filed a lawsuit in the U.S. District Court for the Southern District of Mississippi. *See Hebert v. SoClean, Inc.*, Case No. 6:21-cv-03225-RRS-CBW (W.D. La.); *Sakalarios v. SoClean, Inc.*, Case No. 2:21-cv-00114-HSO-RHWR (S.D. Miss.). The factual allegations in these lawsuits were copied verbatim from a complaint filed against SoClean by a competitor in April 2019.¹ The original suit was a direct and immediate response to proceedings before the National Advertising Division, where SoClean successfully challenged its competitor's false and disparaging advertising claims about ozone. The class action lawsuits at issue here adopted the flawed and unsubstantiated allegations from the 2019 lawsuit, copying them word for word, without any reasonable inquiry or independent investigation into their veracity.

Since Plaintiffs Hebert and Sakalarios filed their actions, numerous actions have been filed against SoClean in multiple districts around the country, seeking relief based on the same or similar factual allegations. (See Doc. 16-1.) As of the date of this filing, SoClean is aware of at least

¹ *Cf. 3B Medical, Inc. v. SoClean, Inc.*, Case No. 1:19-cv-3545 (S.D.N.Y.), Dkt. Nos. 1, 42.

eleven additional actions (the “Related Actions”) pending in nine different districts,² which are based on the same allegations made by Movants-Plaintiffs regarding SoClean’s cleaning device. Movant-Plaintiff William Wheeler (“Wheeler”) filed the fourth of the Related Actions on September 20, 2021 in the Western District of Texas, whereas Movant-Plaintiff Larry Hunter-Blank (“Hunter-Blank”) filed the sixth of the Related Actions on September 28, 2021 in the District of Kansas. *William Wheeler v. SoClean, Inc.*, Case No. 1:21-cv-00837-LY (W.D. Tex.); *Larry Hunter-Blank v. SoClean, Inc.*, Case No. 2:21-cv-02425-HLT-GEB (D. Kan.).³

On October 13, 2021, Movants-Plaintiffs Wheeler and Hunter-Blank filed a Motion for Transfer and Coordination or Consolidation (“Motion to Transfer”) before the U.S. Judicial Panel on Multidistrict Litigation (“Panel”), pursuant to 28 U.S.C. § 1407 and Rule 6.2 of the Rules of Procedure of the Panel. In their Motion to Transfer, Movants-Plaintiffs’ counsel, who are located in Prairie Village, Kansas, and who serve as counsel of record in a minority of the Related Actions,⁴ requested that the Panel transfer the Related Actions to the U.S. District Court for the District of Kansas before the Honorable Holly L. Teeter.

² Related Actions have been filed in at least the following states: Alabama, Arkansas, Georgia, Kansas, Louisiana, Mississippi, Missouri, Oklahoma, and Texas.

³ Based on conversations with Plaintiffs’ counsel, SoClean reasonably expects future actions will be filed in federal district courts in additional states, including at least California, Colorado, Illinois, Indiana, Michigan, Montana, New Mexico, and Tennessee.

⁴ Upon information and belief, counsel for Plaintiffs Hebert and Sakalarios in the first-filed actions are located in Plaquemine, Louisiana and Hattiesburg, Mississippi, and serve as counsel for at least eleven of the first thirteen cases filed.

ARGUMENT

I. ALL PARTIES AGREE THAT TRANSFER AND CONSOLIDATION ARE APPROPRIATE.

Section 1407(a) authorizes the transfer of two or more civil actions, pending in different districts, for coordinated or consolidated pretrial proceedings when: (1) the cases “involv[e] one or more common questions of fact;” and (2) transfer and consolidated or coordinated proceedings will further “the convenience of parties and witnesses” and “will promote the just and efficient conduct of [the] actions.” 28 U.S.C. § 1407. Transfer and consolidation of the Related Actions are appropriate here because each of those requirements is met, thereby promoting the goals of Section 1407.

“The multidistrict litigation statute . . . was enacted as a means of conserving judicial resources in situations where multiple cases involving common questions of fact were filed in different districts.” *Royster v. Food Lion (In re Food Lion)*, 73 F.3d 528, 531-32 (4th Cir. 1996). Two critical goals of Section 1407 are to promote efficiency and consistency. *Illinois Municipal Retirement Fund v. Citigroup, Inc.*, 391 F.3d 844, 852 (7th Cir. 2004). The statute “was [also] meant to ‘assure uniform and expeditious treatment in the pretrial procedures in multidistrict litigation’” and inconsistent pretrial demands that might “‘disrupt the functions of the Federal courts.’” *In re Phenylpropanolamine Prod. Liab. Litig.*, 460 F.3d 1217, 1230 (9th Cir. 2006). Because centralization of the Related Actions “is necessary in order to eliminate duplicative discovery; prevent inconsistent pretrial rulings; and conserve the resources of the parties, their counsel and the judiciary,” the Panel should transfer the Related Actions to a single court. *In re H & R Block Mortg. Corp. Prescreening Litig.*, 435 F. Supp. 2d 1347, 1348 (J.P.M.L. 2006).

A. The Related Actions Involve Common Factual Questions.

The initial test for transferability and coordination pursuant to Section 1407 is the presence of common questions of fact. *In re Fed. Election Campaign Act Litig.*, 511 F. Supp. 821, 823 (J.P.M.L. 1979). The statute, however, does not require a “complete identity or even [a] majority” of common questions of fact to justify transfer. *In re Zyprexa Prods. Liab. Litig.*, 314 F. Supp. 2d 1380, 1381 (J.P.M.L. 2004).

There is no dispute between the parties that the Related Actions share a common core of operative factual allegations.⁵ Plaintiffs in all Related Actions purport to be alleged users and/or purchasers of the SoClean cleaning device. Moreover, Plaintiffs in all Related Actions allege that SoClean made false or misleading representations about the ozone gas used to clean and disinfect CPAP devices and failed to warn its purchasers and users about any potential dangers of ozone gas.

While the legal claims may differ slightly in the Related Actions because of various state laws, this is immaterial to the Panel’s analysis. The Panel has long held that “Section 1407 requires the existence of common questions of fact, not common questions of law.” *In re Air Crash Disaster at Huntington, W. Va. on Nov. 14, 1970*, 342 F. Supp. 1400, 1402 (J.P.M.L. 1972). Here, the Related Actions all rely on the same factual allegations. In short, the Related Actions raise key factual determinations that weigh in favor of transfer and consolidation, including without limitation: (i) whether plaintiffs are purchasers and users of SoClean cleaning devices; (ii) whether the purchasers and users of SoClean cleaning devices were deceived about the devices’ safety as

⁵ Additional evidence of the shared common core can be viewed when making a side-by-side comparison of the various plaintiffs’ complaints, as the documents are nearly identical. *Cf., e.g., Thomas Hebert v. SoClean, Inc.*, Case No. 6:21-cv-03225-RRS-CBW (W.D. La.), ECF No. 1; *Anthony Sakalarios v. SoClean, Inc.*, Case No. 2:21-cv-00114-HSO-RHWR (S.D. Miss.), ECF No. 1; *Eric Hill v. SoClean, Inc.*, Case No. 4:21-cv-00460-CVe-SH (N.D. Okla.), ECF No. 2.

a result of alleged statements and omissions by SoClean; (iii) whether the purchasers and users of SoClean cleaning devices are entitled to any damages; and (iv) if any of the purchasers and users of SoClean cleaning devices are entitled to recovery, the type and amount of damages.

The questions that Plaintiffs contend are common questions justifying class certification pursuant to Fed. R. Civ. P. 23 are all questions that will need to be answered in the Related Actions.⁶ (See Doc. 1-1 at 11.) Because common issues of fact exist among the Related Actions, the first element of the transfer analysis pursuant to Section 1407 is satisfied.

B. Transfer and Consolidation Will Serve the Convenience of the Parties and Witnesses and Will Promote the Just and Efficient Conduct of Actions.

Section 1407 centralization will “ensure[] that pretrial proceedings will be conducted in a streamlined manner leading to the just and expeditious resolution of all actions to the overall benefit of the parties.” *In re Lehman Bros. Hldg., Inc.*, 598 F. Supp. 2d 1362, 1364 (J.P.M.L. 2009). The transfer of actions to a single forum pursuant to Section 1407 is appropriate where, as here, it will prevent duplication of discovery and eliminate the possibility of overlapping or inconsistent determinations by courts of coordinate jurisdiction. *See In re Sony Corp. SXRDRear Projection TV Mktg. Sales Practices & Prods. Liab. Litig.*, 655 F. Supp. 2d 1367 (J.P.M.L. 2009). Fairness and efficiency will be furthered in these cases by folding the Related Actions into a single centralized and coordinated pretrial program managed by a single federal district court and judge.

⁶ SoClean disputes that class treatment is appropriate; however, the questions particular to resolving whether a class or subclass should be certified pursuant to Fed. R. Civ. P. 23 in these matters are similar. Therefore, consolidation and transfer pursuant to Section 1407 is warranted. *See Wal-Mart Stores, Inc. v. Dukes*, 564 U.S. 338, 350, 131 S. Ct. 2541, 180 L. Ed. 2d 374 (2011) (“What matters to class certification . . . is not the raising of common ‘questions’—even in droves—but, rather the capacity of a classwide proceeding to generate common *answers* apt to drive the resolution of the litigation. Dissimilarities within the proposed class are what have the potential to impede the generation of common answers.”) (citation omitted).

This will also minimize the inconvenience, inefficiencies, and expense of redundant and duplicative discovery—the exact purpose of transfer and coordination under Section 1407.

Absent transfer and consolidation, the various federal district court judges would be required to oversee parallel discovery, decide similar motions, and separately consider and resolve many of the same pretrial issues. By contrast, coordination in a single district court would avoid duplicative production of documents and other discovery (especially of third parties); prevent the same defense and third-party witnesses from the inconvenience of appearing in multiple forums throughout the country (including adjudication of motions to compel); conserve judicial resources; and prevent inconsistent rulings.

SoClean and the Movants-Plaintiffs are in agreement that no party would be prejudiced by consolidation. Thus, transfer and coordination pursuant to Section 1407 should be granted as it is necessary to avoid inefficiency and inconsistencies, and to promote the just and efficient resolution of the Related Actions.

C. Additional Reasons Support the Transfer of the Actions to One Court.

There are additional factors not presented in Movants-Plaintiffs' Motion to Transfer that the Panel should also consider in determining whether transfer and consolidation of the Related Actions is appropriate pursuant to Section 1407.

First, consolidation will allow a single district court to address a threshold dispositive issue: whether, in light of SoClean's extensive and ongoing interaction with the FDA, the FDA has primary jurisdiction to evaluate the safety and efficacy of SoClean's ozone cleaning devices and assess the veracity of claims made in promotional materials or advertisements. "The doctrine of primary jurisdiction is concerned with promoting proper relationships between the courts and administrative agencies charged with particular regulatory duties. The doctrine's central aim is to allocate initial decision-making responsibility between courts and agencies and to ensure that they

do not work at cross-purposes.” *Ellis v. Tribune Television Co.*, 443 F.3d 71, 81 (2d Cir. 2006) (citation and internal quotation omitted). Primary jurisdiction “comes into play whenever enforcement of the claim requires the resolution of issues which, under a regulatory scheme, have been placed within the special competence of an administrative body; in such a case, the judicial process is suspended pending referral of such issues to the administrative body for its views.” *United States v. W. Pac. R.R. Co.*, 352 U.S. 59, 63, 77 S. Ct. 161, 1 L. Ed. 2d 126 (1956). Once a district court determines that primary jurisdiction applies, it may either stay proceedings or dismiss the case without prejudice. *Elam v. Kan. City S. Ry.*, 635 F.3d 796, 811 (5th Cir. 2011) (citing *Reiter v. Cooper*, 507 U.S. 258, 268-69, 113 S. Ct. 1213, 122 L. Ed. 2d 604 (1993)). Transfer and consolidation to a single district court is appropriate to avoid inconsistent determinations by courts of coordination “of a particularly complicated issue that Congress has committed to a regulatory agency.” See *Reid v. Johnson & Johnson & McNeil Nutritionals, LLC*, 780 F.3d 952, 966 (9th Cir. 2015) (quoting *GCB Commc’ns, Inc. v. U.S. S. Commc’ns, Inc.*, 650 F.3d 1257, 1264 (9th Cir. 2011)).

Second, transfer to one court for coordination or consolidation is also appropriate because of potential class certification issues associated with the Related Actions. Central to this analysis will be whether the common questions presented by the plaintiffs and the purported class are amenable to answers on a classwide basis. For example, many of the Related Actions do not state whether, how, or when plaintiffs allegedly purchased SoClean devices, or whether, how, or when plaintiffs allegedly were deceived. Moreover, plaintiffs who purchased SoClean devices online could be subject to arbitration or forum selection clauses, and thus unable to join the class action.

The risk of inconsistent judgments by multiple federal district courts on these and other key questions weighs in favor of transfer and consolidation to a single court pursuant to Section 1407.

For all these reasons, SoClean submits that the Panel should enter an Order consolidating the Related Actions.

II. THE MOST APPROPRIATE FORUM FOR TRANSFER IS A DISTRICT COURT WITHIN THE FIFTH CIRCUIT.

In keeping with the Panel's considerations that the transferee court should be a forum appropriate to all parties and the unique issues presented, SoClean submits that a district court within the Fifth Circuit is the most appropriate forum for transfer and coordination or consolidation. Movants-Plaintiffs' request for a specific district court judge in the District of Kansas is not supported by the factors the Panel considers in determining a court for coordination or consolidation and has every indication of improper forum shopping.

When determining the court and judge for the coordination or consolidation of a MDL matter, the Panel considers several factors. The factors typically include: (1) whether *all* parties agreed to a particular jurisdiction *and* if that jurisdiction possessed one of the first-filed cases; (2) the experience or non-experience of the jurisdiction with the particular unique legal issues to be resolved; (3) where the first-filed cases are located as compared to where the movants request transfer; and (4) where the parties and/or witnesses will be located. *See In re Xyrem (Sodium Oxybate) Antitrust Litigation*, 509 F. Supp. 3d 1375, 1376 (J.P.M.L 2020); *In re Johnson & Johnson Aerosol Sunscreen Mktg., Sales Practices and Prods. Liab. Litig.*, ---F. Supp. 3d---, MDL No. 3015, 2021 WL 4704800, at *2 (J.P.M.L Oct. 8, 2021). These factors support transfer to a district court in the Fifth Circuit, and do not support Movants-Plaintiffs' request to transfer to a specific district court judge in the District of Kansas.

A. **A District Court within the Fifth Circuit is the Most Appropriate Forum for Transfer and Coordination or Consolidation.**

Transfer and coordination or consolidation of the Related Actions should occur at a federal district court within the Fifth Circuit. The first two actions (and three of the first four) were filed in federal district courts within the Fifth Circuit. On September 3, 2021, Plaintiff Hebert filed a lawsuit in the Western District of Louisiana and Plaintiff Sakalarios filed a lawsuit in the Southern District of Mississippi. On September 20, 2021, Movant-Plaintiff Wheeler filed the fourth action in the Western District of Texas. Accordingly, three of the first four cases, including the one filed by Movant-Plaintiff Wheeler, are located in the Fifth Circuit.

Convenience of the parties also weighs strongly in favor of transfer to a district court within the Fifth Circuit. While SoClean is a Delaware corporation with its principal place of business in New Hampshire, SoClean's counsel is located in New Orleans, Louisiana. Counsel for Plaintiffs in the first-filed actions, Hebert and Sakalarios, are located in Plaquemines Parish, Louisiana and Hattiesburg, Mississippi. Upon information and belief, counsel for the plaintiffs in the first-filed actions also serve as counsel for the plaintiffs in at least eleven of the first thirteen filed actions. Of the district courts located within the Fifth Circuit, the Eastern District of Louisiana located in New Orleans, Louisiana is centrally located among counsel for all of these parties. And while counsel for Movants-Plaintiffs has filed only two cases, the first of those cases was filed in the Fifth Circuit, undercutting any claim of inconvenience by Plaintiffs-Movants' counsel having to litigate in the Fifth Circuit.

The transferee forum's experience in managing multidistrict litigation also favors the Fifth Circuit. *See, e.g., In re Janus Mutual Funds Inv. Litig.*, 310 F. Supp. 2d 1359, 1361 (J.P.M.L. 2004). There have been 117 MDLs within the Fifth Circuit—including 37 before the Eastern District of Louisiana, 27 before the Northern District of Texas, and 30 before the Eastern District

of Texas.⁷ A judge selected within these district courts, particularly the Eastern District of Louisiana, would have experience with MDLs and the unique issues presented in the Related Actions.

B. Movants-Plaintiffs' Requested Forum is Not an Appropriate Forum for Transfer and Coordination or Consolidation.

Movants-Plaintiffs' request to transfer the Related Actions to a specific judge in the District of Kansas is not supported by the factors the Panel considers when determining transfer and consolidation or coordination. As noted above, the first-filed cases were filed on September 3, 2021 in the Western District of Louisiana and the Southern District of Mississippi, both of which are in the Fifth Circuit. On September 20, 2021, the fourth case was also filed in the Fifth Circuit, when Movant-Plaintiff Wheeler filed his case in the Western District of Texas. On September 28, 2021, Movant-Plaintiff Hunter-Blank filed his case in the District of Kansas.

Movants-Plaintiffs fail to show how the District of Kansas is a convenient forum for the parties, much less a forum more convenient than a district court in the Fifth Circuit, such as the Eastern District of Louisiana. Movants-Plaintiffs simply assert that the District of Kansas is "a geographically central and accessible forum" for plaintiffs who have used SoClean's products. But that is equally true for a host of other locations in the United States accessible by air travel, including the Eastern District of Louisiana. Consolidation in the District of Kansas would cause inconvenience and require significant travel for virtually all parties in the Related Actions.

Movants-Plaintiffs also fail to discuss the convenience of counsel for the parties. As noted above, counsel for SoClean is located in New Orleans, Louisiana and has an office in New Orleans. Counsel for the plaintiffs in the two first-filed actions, and upon information and belief counsel in

⁷ See J.P.M.L., Multidistrict Litigation Terminated Through September 30, 2020, available at https://www.jpml.uscourts.gov/sites/jpml/files/Cumulative%20Terminated%202020_0.pdf.

at least eleven of the first thirteen filed actions, are located in Plaquemines Parish, Louisiana and Hattiesburg, Mississippi. It would be inconvenient for counsel for those parties to travel to Kansas City, Kansas. The mere fact that counsel for the Movants-Plaintiffs is located near Kansas City, Kansas is insufficient to overcome the inconvenience of counsel for SoClean and the vast majority of other plaintiffs. And notably, counsel for Movants-Plaintiffs has filed one of its two cases in the Fifth Circuit, undercutting any argument of inconvenience by that same counsel related to transfer to a district court in the Fifth Circuit.

Finally, Movants-Plaintiffs have not demonstrated relevant experience of their chosen forum or judge with MDLs generally or the unique legal issues to be determined in this case. Movants-Plaintiffs speculate that the two senior judges in the District of Kansas could provide mentorship, and they assert, without factual support, that the district court has the capacity to handle this litigation, ignoring the overall inexperience of Movants-Plaintiffs' district court of choice with multidistrict litigation. There have only ever been 18 MDLs in the District of Kansas, none of which were before U.S. District Court Judge Teeter.⁸ Further, Movants-Plaintiffs have not identified any specific experience with class actions involving the particular unique legal issues to be resolved in these actions in their forum of choice.

CONCLUSION

Movants-Plaintiffs have not established that the District of Kansas is a forum appropriate to *all* parties and the unique issues presented. SoClean respectfully requests that the Panel give due consideration to this Response to Movants-Plaintiffs' Motion and transfer the Related Actions

⁸ See J.P.M.L., Multidistrict Litigation Terminated Through September 30, 2020, available at https://www.jpml.uscourts.gov/sites/jpml/files/Cumulative%20Terminated%202020_0.pdf.

to a district court within the Fifth Circuit, specifically the U.S. District Court for the Eastern District of Louisiana, or for such other relief that the Panel may deem appropriate.

Dated: November 4, 2021

Respectfully submitted,

PROSKAUER ROSE LLP

/s/ Nicole A. Eichberger

Nicole A. Eichberger (La. Bar. No. 28032)
650 Poydras Street, Suite 1800
Poydras Center
New Orleans, Louisiana 70130-6146
Tel. 504.310.4088
Fax 504.310.2022
neichberger@proskauer.com

Attorney for SoClean, Inc.

**BEFORE THE UNITED STATES JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

IN RE: SoClean, Inc. Litigation

MDL No. 3021

SCHEDULE OF ACTIONS

Date filed	Case Caption	Court	Civil Action No.	Judge
9/3/2021	<i>Thomas Hebert v. SoClean, Inc.</i>	W.D. La.	6:21-cv-03225-RRS-CBW	Hon. Robert R. Summerhays
9/3/2021	<i>Anthony Sakalarios v. SoClean, Inc.</i>	S.D. Miss.	2:21-cv-00114-HSO-RHWR	Hon. Sul Ozerden
9/20/2021	<i>William Wheeler v. SoClean, Inc.</i>	W.D. Tex.	1:21-cv-00837-LY	Hon. Lee Yeakel
9/27/2021	<i>Michael L. Stahl v. SoClean, Inc.</i>	D. Kan.	2:21-cv-02424-HLT-GEB	Hon. Holly L. Teeter
9/28/2021	<i>Larry Hunter-Blank v. SoClean, Inc.</i>	D. Kan.	2:21-cv-02425-HLT-GEB	Hon. Holly. L. Teeter
9/30/2021	<i>Paul Brackins, Rosetta Dejarnett, Shelley Key, and Jonathan Griffin v. SoClean, Inc.</i>	M.D. Ala.	2:21-cv-00651-MHT-SRW	Hon. Myron H. Thompson
9/30/2021	<i>John Cupp, Vunor Woods, and Mark Wright v. SoClean, Inc.</i>	N.D. Ala.	1:21-cv-01309-SGC	Hon. Staci G. Cornelius
10/4/2021	<i>Robert Jenkins v. SoClean, Inc.</i>	W.D. Mo.	4:21-cv-00723-BCW	Hon. Brian C. Wimes
10/4/2021	<i>Jackie Turner v. SoClean, Inc.</i>	W.D. Mo.	4:21-cv-00722-FJG	Hon. Fernando J. Gaitan, Jr.
10/6/2021	<i>Jessie Judson Brooks, Sr. v. SoClean, Inc.</i>	M.D. Ga.	5:21-cv-00357-MTT	Hon. Marc T. Treadwell
10/12/2021	<i>Steve Landers, Sr. v. SoClean, Inc.</i>	E.D. Ark.	4:21-cv-00919-BSM	Hon. Brian S. Miller
10/22/2021	<i>Eric Hill v. SoClean, Inc.</i>	N.D. Okla.	4:21-cv-00460-CVE-SH	Hon. Claire V. Eagan
10/29/2021	<i>Richard M. Coley v. SoClean, Inc.</i>	S.D. Ala.	1:21-cv-00472-TFM-B	Hon. Terry F. Moorer

**BEFORE THE UNITED STATES JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION**

IN RE: SoClean, Inc. Litigation

MDL No. 3021

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of November 2021, the foregoing document was served on parties of record via the Court's CM/ECF System and or by email.

John M. Deakle
Ronald V. Johnson, IV
Russell L. Johnson
DEAKLE-JOHNSON LAW FIRM
P.O. Box 2072
Hattiesburg, MS 39403
601-544-0631
601-544-0666 (fax)
jmd@deaklelawfirm.com
rvjohnson@djlawms.com
rljohnson@djlawms.com
*Counsel for Plaintiffs Anthony Sakalarios,
Thomas N. Hebert, Michael L. Stahl, and
Steve Landers*

Patrick W. Pendley
Andrea Leigh Barient
Pendley Baudin & Coffin
P O Drawer 71
Plaquemine, LA 70765
225-975-0150
pwpendley@pbclawfirm.com
abarient@pbclawfirm.com
*Counsel for Plaintiffs Thomas N. Hebert,
Michael L. Stahl, and Steve Landers*

Michael J. White
Kapke & Willerth, LLC
3304 NE Ralph Powell Road
Lee's Summit, MO 64064
816-461-3800
mike@kapkewillerth.com
Counsel for Plaintiff Michael L. Stahl

Michael J. Fleming
Kapke & Willerth, LLC
3304 NE Ralph Powell Rd.
Lee's Summit, MO 64064
816-461-3800
mike@kapkewillerth.com
*Counsel for Plaintiffs Jackie Turner and
Robert Jenkins*

Jubal L Hamil
DEAKLE SHOLTIS & HAMIL LLC
160 Congress Street
P O Box 1031
Mobile, AL 36633
251-432-6020
251-432-6071 (fax)
jhamil@dshfirm.com
*Counsel for Plaintiffs John Cupp, Vunor
Wood, Mark Wright, Paul Brackins, Rosetta
Dejarnett, Shelly Key, Jonathan Griffin, and
Richard Coley*

Thomas P. Thrash
William Thomas Crowder
Thrash Law Firm
1101 Garland Street
Little Rock, AR 72201
501-374-2222
tomthrash@thrashlawfirm.com
willcrowder@thrashlawfirm.com
Counsel for Plaintiff Steve Landers

Richard H. Bishoff
1269 WOODLAND RD
PO BOX 1269
THOMASTON, GA 30286
404-272-1901
706-646-2147 (fax)
rbishoff@bishofflaw.com
Counsel for Plaintiff Jessie Judson Brooks

Derek C. Nuce
300 W GORDON ST
PO DRAWER 1168
THOMASTON, GA 30286
706-646-3200
706-646-2147 (fax)
cnuce@pnlawgroup.com
Counsel for Plaintiff Jessie Judson Brooks

D. Chad Nuce
Pasley, Nuce, Mallory & Davis, LLC
300 West Gordon St.
Post Office Drawer 1168
Thomaston, GA 30286
706-646-3200
706-646-2147 (fax)
cnuce@pnlawgroup.com
*Counsel for Plaintiff Jessie Judson Brooks,
Sr.*

Darrell Wayne Downs
R. Stratton Taylor
Logan Joseph Hathcoat
Taylor Foster Mallett Downs Ramsey &
Russell
P.O. Box 309
Claremore, OK 74018
918-343-4100
918-343-4900 (fax)
ddowns@soonerlaw.com
carabb@soonerlaw.com
lhathcoat@soonerlaw.com
Counsel for Plaintiff Eric Hill

Thomas P. Thrash
William Thomas Crowder
Thrash Law Firm, P.A.
1101 Garland Street
Little Rock, AR 72201
501-374-1058
501-374-2222 (fax)
tomthrash@thrashlawfirmmpa.com
willcrowder@thrashlawfirmmpa.com
Counsel for Plaintiff Steve Landers

Rex A. Sharp
Ruth Anne French-Hodson
Sharp Law, LLP
4820 West 75th Street
Prairie Village, KS 66208
913-901-0505
913-901-0419 (fax)
rsharp@midwest-law.com
rafrenchhodson@midwest-law.com
*Counsel for Plaintiffs William Wheeler and
Larry Hunter-Blank*

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/s/ Nicole A. Eichberger

Nicole A. Eichberger
PROSKAUER ROSE LLP
650 Poydras Street, Suite 1800
New Orleans, LA 70130
Tel: 504-310-2024
Fax: 504-310-2022
neichberger@proskauer.com

Counsel for Defendant SoClean, Inc.