

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

IN RE: HAIR RELAXER MARKETING,)
SALES, PRACTICES, AND PRODUCTS) MDL No. 3060
LIABILITY LITIGATION)
)
)
_____)

**DEFENDANT HOUSE OF CHEATHAM, LLC’S RESPONSE IN OPPOSITION TO
PLAINTIFFS’ MOTION FOR TRANSFER OF ACTIONS PURSUANT TO 28 U.S.C. §
1407 FOR COORDINATED OR CONSOLIDATED PRETRIAL PROCEEDINGS**

Defendant House of Cheatham, LLC¹ respectfully submits this response in opposition to Plaintiffs’ Motion for Transfer of action pursuant to 28 U.S.C. § 1407 for coordinated or consolidated pretrial proceedings.

House of Cheatham, LLC opposes Plaintiffs’ Motion for Transfer and adopts the arguments made in the responses of (1) Dabur International Limited and Namasté Laboratories, LLC (“Namasté and Dabur”); (2) L’Oréal USA, Inc., L’Oréal USA Products, Inc., SoftSheen-Carson LLC, and SoftSheen-Carson (W.I.), Inc. (“L’Oreal”); and (3) Strength of Nature, LLC; Strength of Nature Global, LLC; and Godrej SON Holdings, Inc. (“SON Entities”). House of Cheatham, LLC opposes coordinated, consolidated proceedings for those same reasons. Specifically, a single multidistrict litigation is not necessary to coordinate pretrial proceedings, and individualized issues outweigh common questions, rendering centralization inefficient and wasteful.

Should the Panel be inclined to grant Plaintiffs’ Motion, House of Cheatham, LLC joins in the recommendations of Defendants Namasté and Dabur, L’Oréal, and the SON Entities that any coordinated, consolidated proceedings should be assigned to the Southern District of New York before the Honorable Valerie E. Caproni. As an alternative, House of Cheatham joins in the

¹ House of Cheatham, LLC expressly reserves all rights and defenses including those related to personal jurisdiction and service of process.

recommendations of Defendants Namasté and Dabur, L'Oréal, and the SON Entities that any coordinated, consolidated proceedings should be in the Northern District of Illinois before the Honorable John J. Tharp Jr.

Dated: December 7, 2022

Respectfully submitted,

/s/ R. Trent Taylor

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**COUNSEL FOR HOUSE OF CHEATHAM,
LLC**

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

IN RE: Hair Relaxer Marketing, Sales

Practices, and Products Liability Litigation

MDL No. 3060

PROOF OF SERVICE

In compliance with Rule 4.1(a) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, I hereby certify that on December 7, 2022, a copy of the following documents were served via the JMPL's CM/ECF system, which provides electronic service upon all counsel of record.

1. Defendant House of Cheatham, LLC's Response to Plaintiffs' Motion for Transfer of Actions Pursuant to 28 U.S.C. § 1407 for Coordinated or Consolidated Pretrial Proceedings

2. Proof of Service

I further certify that a copy of the forgoing will be served to all parties who have not yet appeared and to the proposed transferor courts by First Class U.S. Mail:

Clerk, Northern District of Illinois Everett McKinley Dirksen United States Courthouse 219 South Dearborn Street Chicago, Illinois 60604	Clerk, Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007
Clerk, Northern District of California United States Courthouse 450 Golden Gate Avenue San Francisco, California 94102	Clerk, Southern District of Georgia United States Courthouse 8 Southern Oaks Ct. Savannah, Georgia 31405

Dabur USA Inc. 5 Independence Way, Suite 300 Princeton, New Jersey 08540	Godrej Consumer Products Ltd. 64 Ross Road Savannah, Georgia 31405
PDC Brands 750 East Main Street, Suite 1000 Stamford, Connecticut 06901	Parfums De Coeur, Ltd. 750 East Main Street, Suite 1000 Stamford, Connecticut 06901
Beauty Bell Enterprises, LLC d/b/a House of Cheatham, Inc. 647 Mimosa Boulevard Roswell, Georgia 30075	