

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**IN RE: TAXOTERE (DOCETAXEL)
EYE INJURY PRODUCTS
LIABILITY LITIGATION**

Shirley Webb

Plaintiff

v.

**Sanofi US Services Inc.
f/k/a Sanofi-Aventis U.S. Inc.,
Sanofi-Aventis U.S. LLC**

Defendants

MDL No. 3023

Section: "H" (5)

COMPLAINT & JURY DEMAND

Civil Action No: _____

SHORT FORM COMPLAINT

Plaintiff(s) incorporate by reference the Master Long Form Complaints and Jury Demands Filed in the above-referenced case on May 13, 2022 (Docs. 25 & 26). Pursuant to Case Management Order No. 2, this Short Form Complaint adopts allegations and encompasses claims as set forth in the Master Long Form Complaints against Defendant(s).

Plaintiff(s) further allege as follows:

1. Plaintiff:

Shirley Webb

2. Spousal Plaintiff of other party making loss of independent/secondary claim (i.e., loss of consortium):

N/A

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

N/A

4. Current State of Residence: Louisiana

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

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

a. Taxotere Brand Name Defendants

☒

A. Sanofi US Services Inc. f/k/a Sanofi-Aventis U.S. Inc.

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B. Sanofi-Aventis U.S. LLC

c. Other Brand Name Drug Sponsors, Manufacturers, Distributors

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A. Accord Healthcare, Inc.

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B. Actavis LLC f/k/a Actavis Inc.

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C. Actavis Pharma, Inc.

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D. Eagle Pharmaceuticals, Inc.

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E. Hospira, Inc.

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F. Hospira Worldwide, LLC f/k/a Hospira Worldwide, Inc.

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G. Pfizer Inc.

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H. Sagent Pharmaceuticals, Inc.

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I. Sandoz Inc.

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J. Sun Pharma Global FZE

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K. Sun Pharmaceutical Industries, Inc. f/k/a Caraco Pharmaceutical Laboratories

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L. Teikoku Pharma USA, Inc.

☐

M. Other:

7. Basis for Jurisdiction:

Diversity of Citizenship

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

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8. Venue:

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

United States District Court, Western District of Louisiana

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

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A. Taxotere

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B. Docefrez

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C. Docetaxel Injection

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D. Docetaxel Injection Concentrate

☐

E. Unknown

☒

F. Other:

Cyclophosphamide

10. First Date and last date of use (or approximate date range, if specific dates are unknown)

for Products identified in question 9:

Approximate Date Range of Treatment: 9/29/2020 - 12/1/2020

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

Louisiana

12. Alleged injury:

Epiphora of both eyes requiring treatment and follow-up care.

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

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Count I – Strict Products Liability – Failure to Warn

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Count II - Negligence

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Other: Plaintiff(s) may assert the additional theories and/or State Causes of Action against Defendant(s) identified by selecting “Other” and setting forth such claims below if Plaintiff(s) includes additional theories of recovery. The specific facts and allegations supporting additional theories must be pleaded by Plaintiff in sufficient detail as required by the applicable Federal Rules of Civil Procedure.

Dated: March 15, 2023

/s/ William L. Bross

William L. Bross

HENINGER GARRISON DAVIS, LLC

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