IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: HAIR RELAXER MARKETING SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION

Case No. 23 C 818

MDL No. 3060

Judge Mary M. Rowland

## STATUS REPORT AND REQUEST FOR RELIEF

Plaintiffs, by the Plaintiff Leadership Committee ("PLC") in accordance with the minute entry of June 15, 2023, provide the following status report and request for relief:

On June 15, 2023, the Court's Order stated, "If Plaintiffs are not prepared to file the class complaint by that date [7/31/23], they shall file a status report by 7/31/23 updating the Court on the status of that complaint and whether Court intervention is needed." ECF No. 121. First, Court intervention is not needed at this time. The PLC is pleased to report that the competing class action complaints and the lawyers that originally filed the class claims (including certain lawyers that are not part of the Plaintiffs Steering Committee) will be superseded by one Master Class Complaint. Notably, the Master Class Complaint will not allege personal injury claims (an issue that both the Court and Defendants were concerned about). Discussions regarding those claims, as well as other causes of action, and vetting of clients has taken longer than anticipated; as a result, the PLC respectfully requests until August 14, 2023, to file the Master Class Complaint. The PLC will not make any further requests for extensions with respect to the filing of this pleading. The PLC has conferred with counsel for the Defendants and they do not oppose the requested extension of time to file the Master Class Complaint. Thus, the PLC is respectfully requesting that the Court set August 14, 2023, as the filing deadline for the Master Class Complaint.

Dated: July 28, 2023 Respectfully submitted,

/s/ Edward A. Wallace
Edward A. Wallace
WALLACE MILLER
150 N. Wacker Dr., Suite 1100
Chicago, Illinois 60606
312-261-6193
eaw@wallacemiller.com

Diandra "Fu" Debrosse Zimmermann

## DICELLO LEVITT LLP

Plaintiffs' Liaison Counsel

505 20th Street North, Suite 1500 Birmingham, Alabama 35203 312-214-7900 fu@dicellolevitt.com Plaintiffs' Co-Lead Counsel

Fidelma L. Fitzpatrick MOTLEY RICE LLC

40 Westminster Street, Fifth Floor Providence, Rhode Island 02903 401-457-7700 ffitzpatrick@motleyrice.com Plaintiffs' Co-Lead Counsel

Michael A. London **DOUGLAS & LONDON, P.C.**59 Maiden Lane, Sixth Floor
New York, New York 10038
212-566-7500
mlondon@douglasandlondon.com *Plaintiffs' Co-Lead Counsel* 

Benjamin L. Crump BEN CRUMP LAW FIRM 122 South Calhoun Street Tallahassee, Florida 32301 850-224-2020 ben@bencrump.com Plaintiffs' Co-Lead Counsel