

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

*In re: Suboxone (Buprenorphine/Naloxone)* )  
*Film Marketing, Sales Practices, and* )  
*Products Liability Litigation* )

**MDL Docket No. 3092**

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**SUBJECT TO AND WITHOUT WAIVER OF THEIR OBJECTION TO  
PERSONAL JURISDICTION IN THE UNDERLYING CASES,  
DEFENDANTS RECKITT BENCKISER LLC AND RECKITT BENCKISER  
HEALTHCARE (UK) LTD.’S RESPONSE TO PLAINTIFFS’ MOTION  
FOR TRANSFER AND COORDINATION OR CONSOLIDATION UNDER  
28 U.S.C. § 1407 AND RESPONSE TO PLAINTIFFS’ BRIEF IN SUPPORT**

Defendants Reckitt Benckiser LLC and Reckitt Benckiser Healthcare (UK) Ltd. (hereafter, “Defendants”) object to personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2) in the cases identified in Plaintiffs’ Schedule of Actions and all additional “tag-along” cases. This response is made subject to and without waiver of that objection. Defendants have not yet appeared in any of the cases in Plaintiffs’ Schedule of Actions or in the “tag-along” cases, and this Response does not constitute an appearance in those cases.

Subject to their objection to personal jurisdiction and pursuant to 28 U.S.C. § 1407 and Rule 6.1(c) and 6.2(e) of the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, Defendants file their Response to Plaintiffs’ Motion for Transfer and Coordination or Consolidation Under 28 U.S.C. § 1407 and Response to Plaintiffs’ Brief in Support of that motion. Defendants object to the district courts’ exercise of personal jurisdiction in these cases and state that they have been improperly named as defendants in them. Creation of an MDL at this stage, prior to determination of the objections to personal jurisdiction, could result in these Defendants being unnecessarily named in similar lawsuits filed in the future, and Plaintiffs predict additional

actions will be filed. Since Defendants believe they are not proper parties to these actions, Defendants submit they would not be proper parties in any coordinated proceeding.

Should the Panel determine that coordination is appropriate under § 1407, Defendants agree that transfer of these and any subsequently filed “tag-along” cases involving similar facts or claims to the Honorable J. Philip Calabrese, United States District Court for the Northern District of Ohio, for consolidated pretrial proceedings would be appropriate.

Dated: December 6, 2023

Respectfully submitted,

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BEFORE THE UNITED STATES JUDICIAL PANEL  
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*In re: Suboxone (Buprenorphine/Naloxone)* ) MDL Docket No. 3092  
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**PROOF OF SERVICE**

Under Rule 4.1(a) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, I certify that a copy of the foregoing *Subject to and Without Waiver of Their Objection to Personal Jurisdiction in the Underlying Cases, Defendants Reckitt Benckiser LLC and Reckitt Benckiser Healthcare (UK) Ltd.'s Response to Plaintiffs' Motion for Transfer and Coordination or Consolidation Under 28 U.S.C. § 1407 and Response to Plaintiffs' Brief in Support* was served by electronic mail on December 6, 2023, to the following:

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***David Sorensen v. Indivior, Inc., et al., 1:23-CV-01855 (N.D. Ohio)***

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***Teresita Badalamenti v. Indivior, Inc., et al., 1:23-CV-01876 (N.D. Ohio)***

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