

Shanon J. Carson (Admitted Pro Hac Vice)
Jennifer P. Elwell (Admitted Pro Hac Vice)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
215-875-3000
scarson@bm.net; jelwell@bm.net

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard Implanted Port Catheter
Products Liability Litigation

MDL No. 3081

THIS DOCUMENT RELATES TO:

**MASTER SHORT-FORM
COMPLAINT AND JURY TRIAL
DEMAND**

Wanda Miller _____,

Plaintiff(s),

v.

Becton Dickinson and Company, et al.,

Defendants.

Plaintiff(s) named below, for their Complaint against Defendants named below, incorporate(s) by reference the Master Long-Form Complaint in MDL 3081 (Dkt. 119). Pursuant to Case Management Order No. 7, this Short-Form Complaint adopts the allegations, claims, and relief as set forth in the Master Long-Form Complaint. As set forth below, Plaintiff(s) may include (a) additional claims and allegations against Defendants, as set forth in Paragraph 15 or an additional sheet attached hereto; and/or (b) additional claims and allegations against other Defendants, as set forth in Paragraph 5 or an additional sheet attached hereto. Plaintiff(s) further allege(s) as follows:

I. PLAINTIFF(S)

1. Name of Plaintiff/Decedent implanted with Bard Implanted Port Catheter Product ("Device") (first, middle, and last name):
Wanda Miller _____

2. Name of Plaintiff/Decedent's spouse (if bringing a loss-of-consortium claim):
n/a

3. Other Plaintiff and capacity (*i.e.*, administrator, executor, guardian, conservator, representative, survivor, etc.), if any:
n/a

II. DEFENDANT(S)

4. Plaintiff(s) name(s) the following Defendant(s) in this action:

☒ Becton, Dickinson and Company

☒ C.R. Bard, Inc.

☒ Bard Access Systems, Inc.

☒ Bard Peripheral Vascular, Inc.

5. Plaintiff(s) contend(s) that additional parties may be liable or responsible for Plaintiff(s)' damages alleged herein. Such additional parties and their citizenship are as follows:
n/a

III. JURISDICTION AND VENUE

6. City and State of domicile of each Plaintiff at time of filing Plaintiff(s)' initial Complaint:
Saxton, PA

7. City and State of residence of Plaintiff/Decedent at the time of Device placement:
Saxton, PA

8. City and State of residence of Plaintiff/Decedent at the time of alleged injury for which a claim is asserted:
Leesburg, FL

9. Basis for jurisdiction:

☒ Diversity of citizenship (28 U.S.C. § 1332(a))

☐ Other: _____

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

10. Designated forum (United States District Court and Division, if applicable) in which Plaintiff asserts personal jurisdiction and venue would be proper absent direct filing in this MDL:

United States District Court, Western District of Pennsylvania

IV. PRODUCT USE AND INJURY

11. Plaintiff/Decedent was implanted with the following Device(s) and alleges that the Device(s) caused their injuries¹:

☒ BardPort M.R.I. Implantable Port

☐ BardPort M.R.I. Low-Profile Implantable Port

☐ BardPort Titanium Dome Implantable Port

☐ BardPort Titanium Implantable Port

☐ M.R.I. Plastic Dual Lumen Port

☐ M.R.I. Ultra SlimPort Implantable Port

☐ Peritoneal Titanium Port

☐ PowerFlow Implantable Apheresis IV Port

☐ PowerPort ClearVUE isp Implantable Port

☐ PowerPort ClearVUE Slim Implantable Port

☐ PowerPort duo M.R.I. Implantable Port

☐ PowerPort Implantable Port

¹ Check all that apply. See Exhibit A for additional information regarding the corresponding model numbers/product codes for these Devices.

- ☐ PowerPort isp Implantable Port
- ☐ PowerPort isp M.R.I. Implantable Port
- ☐ PowerPort M.R.I. Implantable Port
- ☐ PowerPort Slim Implantable Port
- ☐ PowerPort VUE M.R.I. Implantable Port
- ☐ PowerPort VUE Titanium Implantable Port
- ☐ SlimPort Dual-Lumen Rosenblatt Implantable Port
- ☐ Titanium Low-Profile Port
- ☐ Titanium SlimPort Implantable Port
- ☐ Vaccess CT Low-Profile Titanium Power-Injectable Port
- ☐ Vaccess CT Power-Injectable Implantable Port
- ☐ X-Port isp M.R.I. Implantable Port
- ☐ X-Port Low-Profile Titanium Port
- ☐ Other: _____

12. Date(s) of implantation as to the foregoing Device(s):

January 29, 2021

13. Model number(s)/product code(s), if available, for the foregoing Device(s):

0607675

14. Complication(s) alleged to have occurred from use of the foregoing Device(s):

☐ Catheter fracture

☐ Infection

☒ Thrombosis

☐ Other: _____

V. CAUSES OF ACTION

15. Plaintiff(s) adopt(s) in this Short-Form Complaint the following claims and allegations asserted in the Master Long-Form Complaint:

- ☒ Count I: Design Defect – Strict Liability
- ☒ Count II: Design Defect – Negligence
- ☒ Count III: Failure to Warn/Instruct – Strict Liability
- ☒ Count IV: Failure to Warn/Instruct – Negligence
- ☒ Count V: Manufacturing Defect – Strict Liability
- ☒ Count VI: Manufacturing Defect – Negligence
- ☒ Count VII: Breach of Express Warranty
- ☒ Count VIII: Breach of Implied Warranty
- ☒ Count IX: Negligent Misrepresentation
- ☒ Count X: Fraudulent Misrepresentation
- ☒ Count XI: Fraudulent Concealment
- ☒ Count XII: Consumer Fraud and/or Unfair and Deceptive Trade Practices
- ☒ Count XIII: Unjust Enrichment
- ☐ Count XIV: Loss of Consortium
- ☐ Count XV: Wrongful Death
- ☐ Count XVI: Survival
- ☒ Count XVII: Successor Liability
- ☒ Timeliness and Tolling of Statutes of Limitation and Repose
- ☒ Punitive Damages
- ☐ Count XVIII: Other _____

If additional claim(s) against Defendant(s) are alleged in Count XVIII above, the facts supporting such claim(s) must be pleaded. Plaintiff(s) assert(s) the following factual allegations:

16. Jury Trial demanded for all issues so triable?

☒ Yes

☐ No

WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants and all such further relief that this Court deems equitable and just as set forth in the Master Long-Form Complaint and Jury Demand and any additional relief to which Plaintiff(s) may be entitled.

Dated: March 20, 2024

Respectfully submitted,

/s/ Shanon J. Carson

Shanon J. Carson (Admitted Pro Hac Vice)
Jennifer P. Elwell (Admitted Pro Hac Vice)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
215-875-3000
scarson@bm.net; jelwell@bm.net

EXHIBIT A

<u>Brand Name</u>	<u>Model Number/Product Code</u>
BardPort M.R.I. Implantable Port	0602610, 0602620, 0602640, 0602650, 0602660, 0602670, 0602680, 0602690, 0602830, 0602833, 0602840, 0602843, 0605400, 0605420, 0607173
BardPort M.R.I. Low-Profile Implantable Port	0603830, 0603840, 0603870, 0603880, 6603880
BardPort Titanium Dome Implantable Port	0602850, 0602860, 0602870
BardPort Titanium Implantable Port	0602230, 0602240, 0602270, 0602290, 0603000, 0602820, 0605300, 0605320, 0607301, 0607302, 0602210, 0602260, 0602280, 0602810
M.R.I. Plastic Dual Lumen Port	0603500, 0605920, 0605930, 0607100, 0607200, 0615460
M.R.I. Ultra SlimPort Implantable Port	0605640, 0655640
Peritoneal Titanium Port	0603000, 0603006
PowerFlow Implantable Apheresis IV Port	A710962
PowerPort ClearVUE isp Implantable Port	1606052, 1606062, 1606362, 1606382, 1608052, 1608062, 1608362, 1608382, 1666362, 1668362, 1676300, 5606362, 5608062, 5608362, 5666362, 5668362, CP00004

PowerPort ClearVUE Slim Implantable Port	1616000, 1616001, 1616070, 1616071, 1616300, 1616380, 1618000, 1618001, 1618070, 1618300, 1618380, 1676301, 1678300, 1678301, 5616000, 5616300, 5618000, 5618300, 5676300, 5676301, 5678300, 5678301, CP00005
PowerPort duo M.R.I. Implantable Port	1829500, 1829570, 5829500, 5829502
PowerPort Implantable Port	1708000, 1708001, 1708070, 1708071, 1709600, 1709601, 1759600, 1759601, 1778000, 1778001, 1778070, 1778071
PowerPort isp Implantable Port	1706050, 1706051, 1706060, 1706061, 1708050, 1708051, 1708060, 1708061, 1708160, 1708550, 1708551, 1708560, 1708561, 4708060, 4708061, 4708560, 4708561, CP00001, CP00002, CP00003, CP00009
PowerPort isp M.R.I. Implantable Port	1806050, 1806051, 1806060, 1806061, 1808050, 1808051, 1808060, 1808061, 1808069, 1808360, 1808550, 1808551, 1808560, 1808561, 1809660, 1809661, 1859660, 1859661, 4808060, 4808061, 4808560, 4808561, 9808560
PowerPort M.R.I. Implantable Port	1808000, 1808001, 1808002, 1808070, 1808071, 1808300, 1809600, 1809601, 1809670, 1859600, 1859601, 1878000, 1878001, 1878070, 1878071

PowerPort Slim Implantable Port	1716000, 1716001, 1716070, 1716071, 1716080, 1718000, 1718001, 1718070, 1718500, 1718501, 1718570, 1718571, CP00008
PowerPort VUE M.R.I. Implantable Port	1806052, 1806062, 1808052, 1808062
PowerPort VUE Titanium Implantable Port	1706052, 1706062, 1708052, 1708062
SlimPort Dual-Lumen Rosenblatt Implantable Port	0604970, 0624970, 0654970
Titanium Low-Profile Port	0602180, 0602190, 0605490, 0605510, 0606100, 0606150, 0606200
Titanium SlimPort Implantable Port	0605550, 0605560, 0655510
Vaccess CT Low-Profile Titanium Power-Injectable Port	7360000, 7360001, 7380000
Vaccess CT Power-Injectable Implantable Port	7460000, 7480000, 7496000
X-Port isp M.R.I. Implantable Port	0607500, 0607510, 0607520, 0607530, 0607540, 0607550, 0607555, 0657500, 0657510, 0657520, 0657525, 7707540, 7757540
X-Port Low-Profile Titanium Port	0655870, 0605840, 0605850

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Wanda Miller

(b) County of Residence of First Listed Plaintiff Lake County, FL
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Shanon J. Carson, Berger Montague PC
1818 Market St., Ste. 3600, Philadelphia, PA;
215-875-3000

DEFENDANTS

Becton Dickinson and Company, et al.,

County of Residence of First Listed Defendant Union County, NJ
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input checked="" type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☒ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 U.S.C. §1332

Brief description of cause:
Personal injury due to defective product.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE David G. CampbellDOCKET NUMBER 23-md-03081-DGC (D. Ariz.)

DATE

Mar 20, 2024

SIGNATURE OF ATTORNEY OF RECORD

Shanon J. Carson

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related cases, if any. If there are related cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.