

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: HAIR RELAXER MARKETING SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION	MDL No. 3060 Case No. 23 C 818 Judge Mary M. Rowland This document relates to: All Cases
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**JOINT STATUS REPORT FOR THE
NOVEMBER 14, 2024 STATUS CONFERENCE**

Co-Lead Counsel for Plaintiffs and counsel for Defendants provide this joint status report in advance of the status conference scheduled for November 14, 2024.

I. Status of Pending Briefs/Motions/Orders:

- a. **Plaintiffs' Motion for Dismissal Without Prejudice:** On May 14, 2024, Plaintiffs filed a Motion to Dismiss Non-ovarian, Uterine or Endometrial Cancer Cases without Prejudice (*see* ECF No. 650). Defendants filed their joint Opposition to Plaintiffs' Motion on June 5, 2024 (*see* ECF No. 705). Plaintiffs filed their reply on June 20, 2024 (*see* ECF No. 724). Although the parties attempted to reach an agreement regarding the pending motion, following good faith meet and confers, the parties remain at an impasse. Defendants requested to be heard at the August 29, 2024, Case Management Conference on this pending motion. Pursuant to the Court's August 12, 2024 Minute Entry (*see* ECF No. 786), a separate hearing will be scheduled after the August 29, 2024 Case Management Conference for this motion to be heard, if needed.

Defendants report that the underlying Motion (*see* ECF No. 650) now applies to approximately 451 Plaintiffs who either were included in the original motion or have since requested to be added to the list (an increase from 411 Plaintiffs as reported in the October Joint Status Report). This number increases with each Court Call cycle, as Plaintiffs, who otherwise would have been included on the PFS delinquency or deficiency list for relief under CMO 9, ask to be removed from the Court Call List on the basis that they do not have a cancer diagnosis. In response to Plaintiffs who sought removal from the Court Call List, Defendants have agreed to remove these Plaintiffs from the May/June, August and November Court Call Lists pending the outcome of this Motion.

- b. **L'Oréal S.A.'s Motion to Dismiss:** On September 16, 2024, L'Oréal S.A. filed a motion to dismiss (*see* ECF No. 838). As discussed at the October 10, 2024 Case Management Conference and memorialized in the Court's Minute Entry, the Court denied this motion without prejudice and ordered Plaintiffs to file an amended

Complaint against L'Oréal S.A. Plaintiffs filed a Master Complaint against L'Oréal S.A. on October 18, 2024 (*see* ECF No.899). L'Oréal S.A. was provided a new date by which to file an answer or otherwise file a responsive pleading of December 6, 2024. Per the Court's Minute Entry dated October 11, 2024 (ECF No. 883), by December 13, 2024, the parties are to submit a proposed briefing schedule with respect to L'Oréal S.A.'s anticipated motion to dismiss.

- c. **Proposed Pro Se Protocol:** The Court ordered the Parties to submit a proposed *pro se* protocol by October 31 (*see* ECF No. 917). The Parties submitted a proposed *pro se* protocol on October 31, 2024 for the Court's review. This protocol formalizes the process by which Motions to Withdraw as Counsel are addressed by this Court in this litigation and to allow Plaintiffs' Leadership and Defendants transparency into the notice and communication by which *pro se* Plaintiffs are made aware of their responsibilities, if they pursue their claim. The Parties will be prepared to answer any questions about the proposal at the November Case Management Conference.
- d. **Proposed Amendment to CMO 10 and Dismissal Process:** On October 22, 2024, the parties submitted a proposed Amendment to CMO 10 along with proposed template Notices of Dismissal in order to alleviate confusion surrounding pending motions to dismiss without prejudice for good cause. The parties will be prepared to discuss the proposed amendment and templates with the Court at the November 14th Case Management Conference, if necessary.
- e. **Proposed Common Benefit Case Management Order:** As requested by the Court's Minute Order dated December 11, 2023 (*see* ECF No. 326), the PLC filed their position statement on December 22, 2024. Keller Postman filed their objections on January 12, 2024 (*see* ECF No. 377). The PLC filed their response on January 24, 2024 (*see* ECF No. 411). On January 25, 2024, Keller Postman then filed a Motion to Strike the PLC's response due to the response being in excess of the page limitations (*see* ECF No. 412). On January 26, 2024, the PLC responded to this motion (*see* ECF No. 418) and the court denied Keller Postman's Motion to Strike (*see* ECF No. 419).

On August 22, 2024, the Court issued a Memorandum Opinion and Order granting the PLC's motion in part and denying in part (*see* ECF No. 811). The PLC was directed to submit a revised proposed Common Benefit Order incorporating this Order. On September 6, 2024, the PLC filed a motion for reconsideration (*see* ECF No. 831) and on October 11, 2024, the Court denied this motion and directing the PLC to submit a revised proposed Common Benefit Order by October 25, 2024 (*see* ECF No. 882). The PLC submitted their revised proposed Order to the Court's proposed order mailbox on October 25, 2024 and then an amended proposed Common Benefit Order on October 28, 2024. On October 30, 2024, an opposition to the proposed Common Benefit Order was filed by Singleton Schreiber (*see* ECF No. 927), a law firm who had a member on the Court's Leadership Development Sub-Committee. That attorney unilaterally terminated her membership on the

Leadership Development Sub-Committee via email to the PLC on October 29, 2024. The PLC intends to submit a response to the opposition submitted by Singleton Schreiber, and the PLC will be prepared to address these matters with the Court at the November 14th Case Management Conference, if necessary. Attorneys from Singleton Schreiber have informed the PLC that they will also be in attendance at the November 14th Case Management Conference to address their opposition if the Court wants to hear from either party.

- II. **Report on Pending Motions to Amend Short Form Complaint:** As discussed at the October 10, 2024 Case Management Conference and memorialized in the Minute Entry issued immediately thereafter, on October 18, 2024, Plaintiffs filed a Status Report identifying any pending motions to amend a Short Form Complaint (*see* ECF No. 898). At the time of filing the status report, there were no pending motions to amend as reported by MDL Centrality. As of the filing of this Joint Status Report only one case has a pending motion to amend a Short Form Complaint. That case is *Bryant v. Revlon, Inc., et al* (1:23-cv-07646). The motion to amend was filed on October 17, 2024 and awaits ruling.
- III. **Report on Bellwether Process:** Based upon the guidance from the Court at the October Case Management Conference, the parties will await a decision from the Court on the DWOP motions and at that time will commence their briefing on the best process and procedures to implement a bellwether process in this MDL.
- IV. **Deposition Protocol:** Defense counsel have sent the PLC a proposed deposition protocol and suggested vendor proposals. The PLC is reviewing the proposal prior to engaging in meet and confers to resolve potential differences. Defense counsel propose that the Court set a December 9, 2024 deadline for the submission of an agreed protocol, or to the extent an agreement cannot be reached, competing proposals and/or any statement that a deposition protocol is unnecessary.
- V. **“Second-Wave” Defendants:**
 - a. **Status of Motions to Dismiss:**
 - i. **Advanced Beauty, Inc.:** On July 12, 2024, Defendant Advanced Beauty, Inc. (“Advanced Beauty”) filed its Motion to Dismiss (*see* ECF Nos. 752 and 753). Plaintiffs filed their response on August 30, 2024 (*see* ECF No. 823). Advanced Beauty’s Reply was filed on September 30, 2024 (*see* ECF No. 862).
 - ii. **John Paul Mitchell:** On July 12, 2024, Defendant John Paul Mitchell filed its Motion to Dismiss (*see* ECF No. 750). Plaintiffs filed their response on August 30, 2024 (*see* ECF No. 822). John Paul Mitchell’s Reply was filed on September 30, 2024 (*see* ECF No. 861).
 - iii. **Wella Operations US LLC:** On July 12, 2024, Defendant Wella Operations US LLC (“Wella”) filed its Motion to Dismiss (*see* ECF Nos. 757-762).

Plaintiffs filed their response on August 30, 2024 (*see* ECF No. 821). On October 9, 2024, Wella filed their Reply (*see* ECF No. 880).

- iv. Walgreen Co.: In accordance with the Court's Minute Order dated August 29, 2024, on October 14, 2024, Walgreen Co. ("Walgreens") filed a Motion to Dismiss the complaint filed by Plaintiff Evelyn L. Keating, as Personal Representative of the Estate of Elva Jean Keaton (*see* ECF No. 885-886, *see also* 1:24-cv-1467, ECF 24). Plaintiff's response brief is due on December 2, 2024 and Walgreens reply brief is due December 23, 2024.
- b. **Discovery Status:** Plaintiffs have served an initial set of interrogatories and requests for production of documents, as well as a set of interrogatories related to ESI on defendants Advanced Beauty Systems, John Paul Mitchell, Murrays Worldwide, RNA, Roux Laboratories, and Wella Operations US LLC.

At the October 10, 2024 Case Management Conference, the Court issued a temporary stay on discovery for the "second-wave defendants" until rulings are issued on the pending motions to dismiss, at which time Plaintiffs are to provide a status report as to the number of cases pending before each "second-wave defendant" and a hearing would be set to discuss proposals for discovery moving forward.

- c. **Bronner Brothers, Inc.:** On July 11, 2024, this Court gave Bronner Brothers, Inc. a deadline of July 25, 2024, to file a status report indicating an email address where Plaintiffs could effectuate service pursuant to CMO 8 (*see* ECF No. 769). Fourteen cases have been filed against Bronner Brothers, Inc. A master long form complaint was filed against Bronner Brothers, Inc. by leadership on May 28, 2024 (*see* ECF No. 677). To date, Bronner Brothers, Inc. has not appeared and has failed to file an answer.

As discussed at the October 11, 2024 Case Management Conference, Due to some uncertainty as to whether the registered agent was also Bronner Brothers, Inc.'s attorney, Bronner Brothers, Inc. was served in case number 1:23-cv-08511 on September 23, 2024. Their answer was due on October 14, 2024. To date they have not noticed their appearance or filed an answer or any other responsive pleading. Prior to the next hearing, Plaintiffs will be moving for default judgment.

- VI. **Report on Plaintiff Fact Sheet Discovery Process:** Co-Lead Counsel for Plaintiffs and counsel for Defendants provide this joint update on the CMO 9 Plaintiff Fact Sheet ("PFS") intake and case dismissal protocol. CMO 9 sets out a negotiated and detailed process for Defendants to place Plaintiffs who are alleged to be non-compliant with their PFS discovery obligations on a Court Call List, subjecting these Plaintiff(s) to appropriate Court relief, including issuing an order to show cause, compelling production, or dismissal with or without prejudice.

The last Court Call Hearing was held on August 29, 2024 after which the Court issued various orders. (ECF Nos. 824, 837). Defendants are continuing to monitor Plaintiffs' compliance with the Court's orders and will continue to submit notices of noncompliance for the Court's consideration where appropriate, including unopposed notices wherever possible. The Court reserved its ruling on the Schedule 6 Plaintiffs from the August Court Call List pending the submission of a joint report on these plaintiffs. As ordered, the Parties submitted the Joint Status Report on the Schedule 6 Plaintiffs from the August Court Call List on September 18. (*see* ECF Nos. 843, 844).

The next CMO 9 Court Call Hearing is scheduled for 2:00 PM Central on November 13, 2024, which will be held in person for those who wish to appear in person and via Webex for those who wish to be heard but cannot attend in person. The Parties understand that audio also will be available for those who wish to listen but not be heard. The Parties will jointly submit the Court Call List of cases to be addressed at the hearing on November 8. Further details regarding alleged PFS delinquencies and deficiencies will be addressed with the Court Call List filing, rather than in this status report.

As outlined in CMO 9, PFS compliance process deadlines, including the timing for Defendants to provide a PFS Compliance Meet-and-Confer List of delinquent and/or deficient Plaintiffs to Plaintiffs' Leadership and when the Parties are required to schedule the PFS Compliance Meet and Confer, are determined based off of the date of the scheduled Court Call Hearing. There is currently no Court Call Hearing set after the November Court Call Hearing. The Parties will be prepared to discuss the schedule of ongoing Court Call Hearings at the November Case Management.

- VII. **MDL Centrality Platform Update:** The Parties continue to work with BrownGreer to resolve technical and data issues necessary for the transition of the PFS deficiency review process data to the MDL Centrality platform. The Parties believe the PFS review process will be fully migrated to the MDL Centrality platform by the November Case Management Conference such that data for Plaintiffs on future Court Call Lists should be available for use post-November Court Call Lists. While the migration of the PFS deficiency process to MDL Centrality has begun, this integration was not complete for the November Court Call List and Hearing. This has not delayed Plaintiffs' ability to submit their PFSs and related materials, the Defendants' ability to identify deficiencies, or for many plaintiffs' counsel to cure alleged deficiencies. The system is dynamic in nature and the Parties intend to work cooperatively to ensure that functionality and reporting is available based on the Parties needs as litigation progresses. In addition, MDLC is working to develop a platform through which Plaintiffs will receive relevant notices from MRC as MRC collects third-party records using Plaintiffs' authorizations.

VIII. **State Court Update:** Pursuant to this Court's Minute Order, ECF No. 114, the parties provide the following update on the state court and international court proceedings.

- **Cook County, Illinois Consolidated Actions:** There are at least one hundred forty-five (145) cases filed in Cook County,¹ and these are being consolidated before Judge Patrick T. Stanton on Motion Calendar C for motion practice and discovery. Motions to dismiss in four (4) bellwether cases were granted in part and denied in part, with leave to amend. Following the respective rulings in the bellwether motions to dismiss, consolidated plaintiffs filed an initial master complaint on September 25, 2024 and then an amended master complaint and short form complaint template on October 17, 2024, which defendants anticipate moving to dismiss. Motions to dismiss based on personal jurisdiction remain pending in the bellwether cases, and the Court has set a briefing schedule for certain of the jurisdictional motions. The next status before Judge Stanton is set for November 14, 2024.

Judge Kathy M. Flanagan, who is presiding over the trial calendar for the consolidated proceedings as head of the Cook County Law Division, has indicated that she will eventually be setting dates for joint trials of five plaintiffs at a time, and certain plaintiffs will likely be presenting their proposed trial cohorts for Judge Flanagan at the hearing on November 26, 2024. The parties appeared before Judge Flanagan for continued trial setting on October 29, 2024, to report on the amended and master pleadings. The Court determined that trial setting was not ripe at this time and that the Plaintiffs should give additional thought to creating cohorts that identify some commonality in the proposed cohorts.

Judge Flanagan set the matter for continued hearing on trial setting status to November 26, 2024. Judge Flanagan directed the consolidated plaintiffs to present their trial proposals.

Subject to Judge Stanton setting specific discovery deadlines, Judge Flanagan has directed defendants who are not challenging personal jurisdiction in every Cook County case in which they have been named and served (including those brought in some cases by non-resident plaintiffs against non-resident defendants) to produce all discovery materials from this MDL without waiving any current or future jurisdictional challenges. Plaintiffs seeking additional interrogatories or requests for production from those defendants that produce discovery from the MDL must file an appropriate motion with the motion judge seeking leave to issue such discovery.

¹ Because not all defendants are named in all cases currently filed in Cook County, Illinois and because plaintiffs have not yet served defendants in all instances, this number is likely understated. The parties attach at Appendix A the cases that contributed to this figure.

- **Georgia State Cases:** There are at least sixty-two (62) cases pending in Chatham County, Georgia.² These cases have been consolidated for pretrial purposes before Judge Derek J. White. On June 21, 2024, the Georgia Court of Appeals issued its opinion in *Burroughs v. L'Oreal USA, Inc.*, Case No. STCV2201876, holding that plaintiff's strict liability claims were barred because plaintiff's first use of the alleged products occurred prior to the ten-year statute of repose period. On July 31, 2024, Ms. Burroughs filed a Petition for Writ of Certiorari to the Georgia Supreme Court. The consolidated matters are stayed pending resolution of this appeal.

There are also at least fifty-seven (57) cases pending in DeKalb County, Georgia.³ Briefing on motions to dismiss in each of these matters is ongoing. While these matters are not consolidated, they are now all being assigned to Judge Alvin T. Wong.

There are also at least seven (7) cases pending in Gwinnett County, Georgia.⁴

- **New York State Cases:** There are at least four (4) active cases in New York County, New York,⁵ all of which are currently or will be subject to motions to dismiss. Briefing is complete in one of the cases and a hearing scheduled for January 21, 2025.
- **Pennsylvania State Cases:** At least twenty-six (26) actions are pending in the Court of Common Pleas in Philadelphia County, Pennsylvania, which have been coordinated before Judge Denis Cohen.⁶ Briefing on pleading challenges in these cases is ongoing.

² Because not all defendants are named in all cases currently filed in Chatham County, Georgia and because plaintiffs have not yet served defendants in all instances, this number is likely understated. The parties attach at Appendix B the cases that contributed to this figure.

³ Because not all defendants are named in all cases currently filed in Dekalb County, Georgia and because plaintiffs have not yet served defendants in all instances, this number is likely understated. The parties attach at Appendix C the cases that contributed to this figure.

⁴ Because not all defendants are named in all cases currently filed in Gwinnett County, Georgia and because plaintiffs have not yet served defendants in all instances, this number is likely understated. The parties attach at Appendix D the cases that contributed to this figure.

⁵ Because not all defendants are named in all cases currently filed in New York County, New York and because plaintiffs have not yet served defendants in all instances, this number is likely understated. The parties attach at Appendix E the cases that contributed to this figure.

⁶ Because not all defendants are named in all cases currently filed in Philadelphia County, Pennsylvania and because plaintiffs have not yet served defendants in all instances, this number is likely understated. Defendants attach at Appendix F the cases that contributed to this figure.

- **Delaware State Cases:** Defendants are aware of at least one (1) case filed in New Castle County, Delaware, which, upon proper service, will be subject to motions to dismiss.⁷

- **Canadian Cases:** Two (2) putative class actions are pending in Canada. No class certification motions have been filed in either case yet.

IX. **Request for Revised Deadlines for Certain Joint Status Reports:** Due to the upcoming holidays, the Parties seek the Court's permission to submit the Joint Status Report on January 7, 2025 for the January 9, 2025 Case Management Conference, rather than on January 2, 2025, when it would currently be due.

Dated: November 7, 2024

FOR PLAINTIFFS:

Respectfully Submitted,

/s/Edward A. Wallace

Edward A. Wallace
WALLACE MILLER
150 N. Wacker Dr., Suite 1100
Chicago, Illinois 60606
T: (312) 261-6193
E: eaw@wallacemiller.com

Plaintiffs' Liaison Counsel

Diandra "Fu" Debrosse Zimmermann
DICELLO LEVITT LLC
505 20th Street North, Suite 1500
Birmingham, Alabama 35203
T: (312) 214-7900
E: fu@dicellolevitt.com

Plaintiffs' Co-Lead Counsel

Fidelma L. Fitzpatrick
MOTLEY RICE LLC
40 Westminster Street, Fifth Floor
Providence, Rhode Island 02903
T: (401) 457-7700
E: ffitzpatrick@motleyrice.com

Plaintiffs' Co-Lead Counsel

FOR DEFENDANTS:

Respectfully Submitted,

/s/Mark C. Goodman

Mark C. Goodman
BAKER & MCKENZIE LLP
Two Embarcadero Center, Suite 1100
San Francisco, California 94111
T: (415) 576-3080
E: mark.goodman@bakermckenzie.com

*Defense Liaison Counsel and Counsel for Defendant
Namasté Laboratories, LLC*

Mark D. Taylor
BAKER & MCKENZIE LLP
1900 North Pearl Street, Suite 1500
Dallas, Texas 75201
T: (214) 978-3000
E: mark.taylor@bakermckenzie.com

Maurice Bellan
Teisha C. Johnson
BAKER & MCKENZIE LLP
815 Connecticut Avenue, NW
Washington DC 20006
T: (202) 452-7057
E: maurice.bellan@bakermckenzie.com
E: teisha.johnson@bakermckenzie.com

⁷ Because not all defendants are named in all cases currently filed in New Castle County, Delaware and because plaintiffs have not yet served defendants in all instances, this number may be understated. Defendants attach at Appendix G the case that contributed to this figure.

Michael A. London
DOUGLAS & LONDON, P.C.
59 Maiden Lane, Sixth Floor
New York, New York 10038
T: (212) 566-7500
E: mlondon@douglasandlondon.com

Plaintiffs' Co-Lead Counsel

Benjamin L. Crump
BEN CRUMP LAW FIRM
122 South Calhoun Street
Tallahassee, Florida 32301
T: (850) 224-2020
E: ben@bencrump.com

Plaintiffs' Co-Lead Counsel

Barry Thompson
BAKER & MCKENZIE LLP
10250 Constellation Boulevard, Suite 1850 Los Angeles, CA
90067
T: (310) 201-4703
E: barry.thompson@bakermckenzie.com

Colleen Baime
Laura Kelly
BAKER & MCKENZIE LLP
300 East Randolph Street, Suite 5000
Chicago, Illinois 60601
T: (312) 861-2510
E: colleen.baime@bakermckenzie.com
E: laura.kelly@bakermckenzie.com

Counsel for Defendant Namasté Laboratories, LLC

Seth A. Litman
Irvin Hernandez
THOMPSON HINE LLP
Two Alliance Center
3560 Lenox Road, Suite 1600
Atlanta, GA 30326
T: (404) 541-2900
E: seth.litman@ThompsonHine.com
E: irvin.hernandez@ThompsonHine.com

Counsel for Defendants Keratin Complex and Keratin Holdings, LLC

Dennis S. Ellis
Katherine F. Murray
Serli Polatoglu
ELLIS GEORGE LLP
2121 Avenue of the Stars
Suite 3000, 30th Floor
Los Angeles, CA 90067
T: (310) 274-7100
F: (310) 275-5697
E: dellis@ellisgeorge.com
E: kmurray@ellisgeorge.com
E: spolatoglu@ellisgeorge.com

Jonathan Blakley

GORDON REES SCULLY MANSUKHANI LLP

1 N. Franklin St., Suite 800
Chicago, IL 60606
T: (312) 565-1400
F: (312) 565-6511
E: jblakley@grsm.com

Peter Siachos

GORDON REES SCULLY MANSUKHANI LLP

18 Columbia Turnpike, Suite 220
Florham Park, NJ 07932
T: (973) 549-2500
F: (973) 377-1911
E: psiachos@grsm.com

*Counsel for Defendants L'Oréal USA, Inc., L'Oréal USA
Products, Inc. and SoftSheen-Carson LLC*

Lori B. Leskin

ARNOLD & PORTER KAYE SCHOLER, LLP

250 West 55th Street
New York, NY 10019
T: (212) 836-8641
F: (212) 836-8689
E: lori.leskin@arnoldporter.com

Rhonda R. Trotter

ARNOLD & PORTER KAYE SCHOLER, LLP

777 South Figueroa Street, 44th Floor
Los Angeles, CA 90017
T: (213) 243-4000
F: (213) 243-4199

*Counsel for Defendants Strength of Nature LLC; Strength of
Nature Global LLC; and Godrej SON Holdings*

R. Trent Taylor

MCGUIREWOODS LLP

Gateway Plaza
800 East Canal Street
Richmond, VA 23219-3916
T: (804) 775-1182
F: (804) 225-5409
E: rtaylor@mcguirewoods.com

Patrick P. Clyder

Royce B. DuBiner
MCGUIREWOODS LLP
77 West Wacker Drive, Suite 4100
Chicago, IL 60601-1818
T: (312) 849-8100
F: (312) 849-3690
E: pplyder@mcguirewoods.com
E: rdubiner@mcguirewoods.com

Counsel for Defendant House of Cheatham LLC

Joseph P. Sullivan
Kevin A. Titus
Bryan E. Curry
LITCHFIELD CAVO LLP
303 W. Madison, Suite 300
Chicago, IL 60606
T: 312-781-6677
F: 312-781-6630
E: sullivanj@litchfieldcavo.com
E: titus@litchfieldcavo.com
E: curry@litchfieldcavo.com

*Counsel for Defendant Beauty Bell Enterprises, LLC f/k/a
House of Cheatham, Inc.*

Richard J. Leamy, Jr.
Kristen A. Schank
Anna Morrison Ricordati
WIEDNER & MCAULIFFE, LTD.
1 N. Franklin St., Suite 1900
Chicago, Illinois 60606
T: (312) 855-1105
E: rjleamy@wmlaw.com
E: kaschank@wmlaw.com
E: amricordati@wmlaw.com

Counsel for Defendant Avlon Industries, Inc.

Melissa Fallah
Robert W. Petti
Alyssa P. Fleischman
MARON MARVEL
191 N. Wacker Drive – Suite 2950 Chicago, Illinois 60606
T: (312) 579-2018 (ofc)
E: mfallah@maronmarvel.com

E: rpetti@maronmarvel.com
E: afleischman@maronmarvel.com

Counsel for Defendant Luster Products, Inc.

Robert A. Atkins
Daniel H. Levi
Shimeng (Simona) Xu
**PAUL, WEISS, RIFKIND, WHARTON & GARRISON
LLP**
1285 Avenue of the Americas
New York, NY 10019
T: (212) 373-3000
E: ratkins@paulweiss.com
E: dlevi@paulweiss.com
E: sxu@paulweiss.com

Randy S. Luskey
**PAUL, WEISS, RIFKIND, WHARTON & GARRISON
LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
T: (628) 432-5112
E: rluskey@paulweiss.com

David E. Cole
**PAUL, WEISS, RIFKIND, WHARTON & GARRISON
LLP**
2001 K Street, NW
Washington, DC 20006
T: (202) 223-7348
E: dcole@paulweiss.com

Edward P. Abbot
Melissa He
Erich J. Gleber
HAWKINS PARNELL & YOUNG LLP
275 Madison Avenue, 10th Floor
New York, NY 10016
E: eabbot@hpylaw.com
E: mhe@hpylaw.com
E: egleber@hpylaw.com

Counsel for Defendants Revlon, Inc., Revlon Consumer Products Corporation, and Revlon Group Holdings LLC

Heidi Levine
SIDLEY AUSTIN LLP
787 7th Ave
New York, NY 10019
T: (212) 839-5300
E: hlevine@sidley.com

Lisa M. Gilford
SIDLEY AUSTIN LLP
555 W 5th St,
Los Angeles, CA 90013
T: (213) 896-6000
E: lgilford@sidley.com

Kara L. McCall
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603
T: (312) 853-2666
E: kmccall@sidley.com

Counsel for Defendant Sally Beauty Supply LLC

Joseph J. Welter
Ryan M. Frierott
GOLDBERG SEGALLA
665 Main Street
Buffalo, NY 14203
T: (716) 566-5457
E: jwelter@goldbergsegalla.com
E: rfrierott@goldbergsegalla.com

Counsel for Defendant AFAM Concept, Inc.

Seth V. Alhadeff
Ravika Rameshwar
DINSMORE & SHOHL LLP
Southeast Financial Center
200 S. Biscayne Blvd.
Suite 2401
Miami, FL 33131
T: (786) 957-1136
E: seth.alhadeff@dinsmore.com

E: ravika.rameshwar@dinsmore.com

Matthew C. Wasserman
DINSMORE & SHOHL LLP
222 W. Adams Street
Suite 3400
Chicago, IL 60606
E: matthew.wasserman@dinsmore.com

Counsel for Defendant McBride Research Laboratories, Inc.

Daniel L. Stanner
Ashley Crettol Insalaco
Megan E. Ryan
TABET DIVITO & ROTHSTEIN LLC
209 S. LaSalle Street, 7th floor
Chicago, IL 60604
T: (312) 762-9450
E: dstanner@tdrlaw.com
E: ainsalaco@tdrlaw.com
E: mryan@tdrlaw.com

Counsel for Defendant RNA Corporation

APPENDIX A**Cook County, Illinois Cases**

Cook County Case No.	Caption
2022-L-011132	Janita Hayes v. Namaste Laboratories, LLC, et al.
2023-L-001824	Vanessa Page v. L'Oréal USA, Inc., et al.
2023-L-01934	Hasin Ramadan v. L'Oréal USA, Inc., et al.
2023-L-003274	LaPagent Holton v. L'Oréal USA, Inc., et al.
2023-L-005962	Tameka McEwing v. Namaste Laboratories, LLC, et al.
2023-L-005963	Malika Marshall-Rias v. Namaste Laboratories, LLC, et al.
2023-L-005953	Samerreha Pride v. Namaste Laboratories, LLC, et al.
2023-L-005959	Shaneetra Ferguson v. Namaste Laboratories, LLC, et al.
2023-L-005958	Traccye Love v. Namaste Laboratories, LLC, et al.
2023-L-006390	Tenika Campbell v. Strength of Nature, LLC, et al
2023-L-006448	Vernessa Compton v. L'Oréal USA, Inc. et al
2023-L-010238	Dorothy Kelly, individually, and as representative of the Estate of Kannetric Kelly, deceased v. L'Oréal USA, Inc., et al.
2023-L-11126	Trionna Adams v L'Oréal USA, Inc., et al.
2023-L-11128	Tasha Magett v. L'Oréal USA, Inc., et al.
2023-L-11127	Abimbola Brown v. L'Oréal USA, Inc., et al.
2023-L-11131	Jana Mullins v. L'Oréal USA, Inc., et al.
2023-L-11136	Mechele Thompson v. L'Oréal USA, Inc., et al.
2023-L-11138	Tracy Tuck v. Loreal USA, Inc., et al.
2023-L-11140	Marilyn Williams v. L'Oréal USA, Inc., et al.
2023-L-12193	Kristen Brown Pleasant and Richard Pleasant II v. AFAM Concept Inc., et al.
2023-L-11495	Maranda Lofton v. L'Oréal USA, Inc., et al.
2024-L-945	Beverly and Jason Dorris v. House of Cheatham, LLC, et al.
2024-L-674	LaTonya and Reginald Brown v. Afm Concept Inc. dba JF Labs Inc., et al.
2024-L-901044	Alice Marie Jones v. AFAM Concept, Inc., et al.
2024-L-01090	Shelia Grant v. L'Oréal USA, Inc., et al.
2024-L-001165	LaNyece Griffin-Hodge v. AFAM Concept, Inc., et al.
2024-L-001168	Sandra Simpson v. L'Oréal USA, Inc., et al.
2024-L-1500	Candice and Manuel Trujillo v. AFAM Concept, Inc., et al.
2024-L-2155	Lisa and Jerney English v. AFAM Concept Inc., et al.
2024-L-002239	Allison Perkins-Caldwell v. AFAM Concept, Inc., et al.
2024-L-002254	Tonya Campbell v. L'Oreal USA, Inc. et al.
2024-L-2350	Kimberly Turner v. Avlon Industries, Inc., et al.
2024-L-2579	Angelic Woodard v. AFAM Concept Inc., et al.
2024-L-03419	Charsla Garrett v. Beauty Bell Enterprises, et al.
2024-L-03487	Alvernell Gee v. Avlon Industries, et al.
2024-L-04152	Waleah Payne v. L'Oréal USA, Inc., et al.

Cook County Case No.	Caption
2024-L-04217	Alma Frierson v. Namaste Laboratories, LLC, et al.
2024-L-4714	Oludare Ajayi, on his own behalf and as special administrator of the Estate of Dorcas Ajayi, deceased v. L'Oréal USA, Inc, et al.
2024-L-4892	Joshlyn Little v. AFAM Concept, Inc., et al
2024-L-5128	Damita Bell v. Namaste Laboratories LLC, et al.
2024-L-5160	Joyce Walker v. L'Oréal USA, Inc., et al.
2024-L-5191	Geraldine Mays v. L'Oréal USA, Inc., et al.
2024-L-5424	Noelle McDonald v. L'Oréal USA, Inc., et al.
2024-L-5505	Darlene Lake v. L'Oréal USA, Inc., et al.
2024-L-5812	Brenda Gwin v. AFAM Concept, Inc., et al.
2024-L-6234	Storme Love v. L'Oréal USA, Inc., et al
2024-L-6857	Thedora Lemons v. Namaste Laboratories LLC, et al.
2024-L-7080	Wanda Matos v. L'Oréal USA, Inc., et al.
2024-L-7095	Sheila Parham-Miles v. L'Oréal USA, Inc., et al.
2024-L-06916	Elizabeth Medrano v. L'Oréal USA, Inc., et al.
2024-L-06923	Quatina Johnson v. AFAM Concept, Inc., et al.
2024-L-08315	Carol Brown v. L'Oréal USA, Inc., et al.
2024-L-08424	Ruth McClary v. Godrej Son Holdings, Inc., et al.
2024-L-008900	Cathy Kenniel v. Beauty Bell Enterprises, et al.
2024-L-08907	Tiffany Pitts v. Godrej Son Holdings, Inc., et al.
2024-L-09144	Shandra Dunn v. Namaste, et al.
2024-L-009449	Rhonda Hawkins v. AFAM Concept, Inc., et al.
2024-L-09450	Dwina Griffin v. AFAM Concept, Inc., et al.
2024-L-009452	LaShawn Scott v. L'Oreal USA, Inc., et al.
2024-L-09777	Surenthia Jenkins v. Namaste Laboratories LLC, et al.
2024-L-010190	Tammy Shanklin v. AFAM Concept, Inc., et al.
2024-L-10244	Patricia Guy v. L'Oréal USA, Inc., et al.
2024-L-10245	Annette Fitch v. L'Oréal USA, Inc., et al.
2024-L-10246	Mellony Harris v. L'Oréal USA, Inc., et al.
2024-L-10271	Linda Heath v. L'Oreal USA, Inc., et al.
2024-L-10318	Jennifer Ruth, as independent administrator of the Estate of Christine McNabb, deceased v. L'Oréal USA, Inc., et al.
2024-L-10274	Josephin McCullum v. L'Oréal USA, Inc., et al.
2024-L-10553	Melissa Laton Odom v. Avlon Industries, et al.
2024-L-10635	Natasha Clark v. Afam Concept Inc., et al.
2024-L-10678	Dana Banks v. L'Oréal USA, Inc., et al.
2024-L-10680	Delorian Green v. Avlon Industries, et al.
2024-L-010692	Shayla Robinson v. Avlon Industries, et al.
2024-L-010703	Odessa Williams v. Strength of Nature, et al.
2024-L-10832	Sashah Catantii v. Godrej Son Holdings Inc., , et al.
2024-L-011139	LeeAndra D. Khan v. L'Oreal USA, Inc., et al.
2024-L-11140	Cassandra Andrews v. L'Oréal USA, Inc., et al.

Cook County Case No.	Caption
2024-L-11148	Lauren Yucan v. AFAM Concept Inc., et al.
2024-L-11152	Ashley Strickland-Horne, Chris Horne Jr. v. Avlon Industries, et al.
2024-L-11160	Tracie Armour-Adetunji v. AFAM Concept Inc., et al.
2024-L-11166	Talia Johnson v. Afam Concept Inc., et al.
2024-L-11171	Cassandra and Frank Walton v. Namaste Laboratories LLC, et al.
2024-L-11279	Sheena Lewis v. L'Oréal USA, Inc., et al.
2024-L-11258	Beverly Pratt v. AFAM Concept Inc. dba JF Labs Inc., et al
2024-L-11394	Trilette Andrews v. Namaste Laboratories LLC, et al.
2024-L-11398	Jacqueline Newman v. Namaste Laboratories LLC, et al.
2024-L-11399	Sylvia Jefferson v. Namaste Laboratories LLC, et al.
2024-L-11466	Evelyn Bruce v. Avlon Industries Inc., et al.
2024-L-11470	Gerald Dean Green v. AFAM Concept Inc., et al
2024-L-11473	Emma Norwood v. Avlon Industries Inc., et al.
2024-L-11524	Marcia Berkeley v. Namaste Laboratories LLC,
2024-L-11527	Cynthia Harvey v. Avlon Industries Inc., et al.
2024-L-11532	Maryanne Lindsey v. Namaste Laboratories LLC, et al.
2024-L-11538	Antoinette Johnson v. Namaste Laboratories LLC, et al.
2024-L-11575	Tonya Smith v. L'Oréal USA, Inc., et al.
2024-L-11587	Kimberly Faison v. Beauty Bell Enterprises LLC fka House of Cheatham Inc., et al.
2024-L-11586	Vickeye Goolsby v. Beauty Bell Enterprises LLC fka House of Cheatham Inc., et al.
2024-L-11589	Sejuan Poole v. L'Oreal USA, Inc., et al.
2024-L-11590	Etta Brown v. L'Oreal USA, Inc., et al.
2024-L-11597	Beverly Warden v. Namaste Laboratories LLC, et al
2024-L-11603	Patricia Miller v. L'Oréal USA, Inc., et al
2024-L-011612	Suzanne Brown v. AFAM Concept, Inc., et al.
2024-L-011616	Brenda Mims v. Avlon Industries, et al.
2024-L-011622	Claudette Elston v. AFAM Concept, Inc., et al.
2024-L-011627	Delphia Ellis v. AFAM Concept, Inc., et al.
2024-L-11628	Shirley Davis v. Avlon Industries Inc., et al.
2024-L-11631	Johnnie Logan v. Namaste Laboratories LLC, et al.
2024-L-11644	Bettye Smith v. L'Oréal USA, Inc., et al
2024-L-11648	D'Adrian Steward v. L'Oréal USA, Inc., et al.
2024-L-11649	Margie Richardson v. L'Oréal USA, Inc., et al.
2024-L-11652	Felicia Shaw v. L'Oréal USA, Inc., et al.
2024-L-011654	Merill Stegall v. AFAM Concept, Inc., et al.
2024-L-011677	Cynthia Guzman v. L'Oreal USA, Inc., et al.
2024-L-11678	Denise Baldwin v. L'Oréal USA, Inc., et al.
2024-L-11684	Cheyney Turner v. Namaste Laboratories LLC, et al.
2024-L-11688	Tameka Burks v. Namaste Laboratories LLC, et al.
2024-L-11689	Angel Loyaloy v. Namaste Laboratories LLC, et al.
2024-L-11690	Katty Martinez v. Namaste Laboratories LLC, et al.

Cook County Case No.	Caption
2024-L-11690	Veronica Bradley v. Namaste Laboratories LLC, et al.
2024-L-11693	Cheyenne Johnson, individually and obo of the Estate of Letisha Young, deceased v. L’Oreal USA, Inc., et al.
2024-L-11699	Shawna Spraggins v. Namaste Laboratories LLC, et al.
2024-L-11700	Angela Banks v. Namaste Laboratories LLC, et al.
2024-L-11703	Alyssa Bollers v. Namaste Laboratories LLC, et al.
2024-L-11703	Deborah Chambliss, individually and obo the Estate of Elizabeth Montford, deceased v. L’Oréal USA, Inc., et al.
2024-L-11704	Genita Seaton v. Namaste Laboratories LLC, et al.
2024-L-11708	Jessica Holowach v. Avlon Industries, et al.
2024-L-0011715	Shirley Hollins v. AFAM Concept, Inc., et al.
2024-L-11716	Linda Doby v. Namaste Laboratories LLC, et al.
2024-L-11719	Renata Blackmon v. Namaste Laboratories LLC, et al.
2024-L-11732	Sharion Williams-Davis v. Beauty Bell Enterprises LLC dba House of Cheatham Inc., et al.
2024-L-11737	Chanelle Gilchrist v. Namaste Laboratories LLC, et al.
2024-L-11735	Shantalena Moore v. AFAM Concept Inc. dba JF Labs Inc., et al.
2024-L-11735	Damonica Ware v. AFAM Concept Inc. dba JF Labs Inc., et al.
2024-L-11753	Fretima Burnett v. AFAM Concept Inc. dba JF Labs Inc., et al.
2024-L-11907	Ashley Marsh v. Namaste Laboratories LLC, et al.
2024-L-11908	Carmella Curry v. Namaste Laboratories LLC, et al.
2024-L-11918	Tiarie Barnes v. Namaste Laboratories LLC, et al.
2024-L-11979	Isabelle Cowans v. AFAM Concept Inc. dba JF Labs Inc., et al.
2024-L-12017	Aretha Clayton v. L’Oréal USA, Inc., et al.
2024-L-12008	Tena Jackson v. Namaste Laboratories LLC, et al.
2024-L-12007	Whykisha Easterling v. Namaste Laboratories LLC, et al.
2024-L-11998	Sonya Wilburn v. Namaste Laboratories LLC, et al.
2024-L-12088	Ora Knox v. L’Oréal USA, Inc., et al.
2024-L-12121	Josephine Evans v. Beauty Bell Enterprises LLC fka House of Cheatham Inc., et al.
2024-L-12148	Jessica Roland v. Namaste Laboratories LLC, et al.
2024-L-12157	Laverna Mance v. Namaste Laboratories LLC, et al.
2024-L-012192	Cotina Holmes v. Beauty Bell Enterprises, LLC, et al.

APPENDIX B**Chatham County, Georgia Cases**

Chatham County Case No.	Caption
STCV22-01876	Kiara Burroughs v. Strength of Nature Global, LLC, et al.
STCV23-00217	Wanda Crawford v L'Oréal USA Inc.
STCV23-01122	Bevelyn Young v L'Oréal USA Inc.
STCV23-01518	Gloria Walker v L'Oréal USA Inc.
STCV23-01528	Roshunta Bell v. Strength of Nature Global, LLC, et. al
STCV23-01529	Deavera Lockheart v. Strength of Nature Global LLC
STCV23-01641	Mojirayo Adepoju v. L'Oréal USA, Inc., et al.
STCV23-02580	Pamela Pullie v Strength of Nature LLC
STCV23-02581	Deborah Freeman v Strength of Nature LLC
STCV23-02583	Erica Latimer v. Strength of Nature, et al.
STCV23-02584	Toya Dickerson v. Strength of Nature LLC, et al.
STCV23-02585	Pamela Barney-Culbreth v. Strength of Nature, et al.
STCV23-02589	Florine Lakes v. Namaste Laboratories LLC, et al.
STCV24-00234	Deidre Shy v. Strength of Nature, et al.
STCV24-00663	Mary McClendon v. Beauty Bell Enterprises, Inc., et al.
STCV24-01101	Linda Yearby v Strength of Nature Global LLC
STCV24-01306	Verenessia Turner v Strength of Nature LLC
STCV24-01885	Tammie Stallworth v. Strength of Nature, et al.
STCV24-02213	Gwendolyn Martin v. Strength of Nature, et al.
STCV24-02214	Linda Ramos v Strength of Nature LLC
STCV24-02215	Carolyn Renee Robinson v Strength of Nature LLC
STCV24-02216	Jeanetta Williams v Strength of Nature LLC et al.
STCV24-02255	Cassandra Jackson v. Strength of Nature LLC, et al.
STCV24-02258	Shannon Brazil v. Strength of Nature Global, LLC, et al.
STCV24-02293	Lorinda Smith v. Strength of Nature LLC, et al.
STCV24-02307	Christine Conde v. Strength of Nature LLC, et al.
STCV24-02343	Cheryl Richardson v Strength of Nature LLC
STCV24-02366	Mignon Ford v Strength of Nature LLC
STCV24-02367	Robin Raines v. Strength of Nature LLC, et al.
STCV24-02369	Virgina Reese v Strength of Nature LLC
STCV24-02370	Paulette Dennard v. Namaste, et al.
STCV24-02376	Tiffany Bentford vs. Strength of Nature LLC, et al.
STCV24-02378	Maelany Blakely v Strength of Nature LLC
STCV24-02384	Dorothy Shelton v Godrej Son Holdings
STCV24-02396	Nichole Johnson v. Strength of Nature Global LLC, et al.
STCV24-02397	Gwenerdette Battle v. Strength of Nature LLC, et al.
STCV24-02398	Stephanie Hayes v. Strength of Nature LLC, et al.
STCV24-02399	Alison Lewis v. Strength of Nature LLC, et al
STCV24-02401	Saydi Rochez v. Strength of Nature LLC, et al.
STCV24-02402	Marilyn Pinckney v Soft Sheen Carson LLC
STCV24-02405	Janet Williams v. Strength of Nature LLC, et al.
STCV24-02406	Diane Gray v Strength of Nature LLC

STCV24-02407	Natha Harris v Avlon Industries
STCV24-02412	Anita Miller v L'Oréal USA Inc.
STCV24-02414	Regina Phillips v. Strength of Nature LLC, et al.
STCV24-02416	Twyla Southall v. Strength of Nature LLC, et al.
STCV24-02426	Howard Cheek v. Strength of Nature LLC, et al.
STCV24-02429	Romayne Short. v. L'Oréal USA, Inc., et al.
STCV24-02430	Christine Bowden v. Strength of Nature LLC, et al.
STCV24-02431	Sherri Hobbs v. Strength of Nature LLC, et al.
STCV24-02432	Brenda Murrell v. Strength of Nature LLC, et al.
STCV24-02433	Ethel Thornton v L'Oréal USA Inc.
STCV24-02434	Stephen Thomas v. Strength of Nature LLC, et al.
STCV24-02435	Erma Patterson v. Strength of Nature LLC, et al.
STCV24-02462	Shontrice Balkcom v. Strength of Nature LLC, et al.
STCV24-02489	Vanessa Murry v. L'Oréal USA, Inc., et al.
STCV24-02502	Tanjanika Andrews v. Avlon Industries, et al.
STCV24-02505	Atrelle Horn v L'Oréal USA Inc.
STCV24-02508	Brenda Gibson v L'Oréal USA Inc.
STCV24-02509	Ida Newton v L'Oréal USA Inc
STCV24-02531	Rosanna Burns v. Strength of Nature LLC, et al.
STCV24-02535	Toinette Stephens v L'Oréal USA Products Inc.

APPENDIX C**DeKalb County, Georgia Cases**

DeKalb County Case No.	Caption
24A01165	Michelle Lowe v. AFAM Concept Inc., et al.
24A01169	BreeShawna Watts v. AFAM Concept Inc., et al.
24A02702	Marnitta Ballard v. L'Oréal USA, Inc. et al.
24A03590	Mary Hector and Courtney Hector v. Godrej Son Holdings, Inc., et al.
24A03824	Yotonia Hughes v. Godrej Son Holdings Inc., et al.
24A04274	Jamie Johnson v. L'Oréal USA, Inc., et al.
24A04581	Lucretia Andrews v. Beauty Bell Enterprises, LLC, et al.
24A04709	Sholonda Campbell v. Beauty Bell Enterprises, LLC, et al.
24A05258	Dikanya Clark v Beauty Bell Enterprises LLC
24A05260	Patricia Coakley v Beauty Bell Enterprises LLC
24A05261	Racheal C. Hoskins v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A05430	Eula Jackson-Smith v. Beauty Bell Enterprises LLC fka House of Cheatham Inc., et al.
24A05435	Delois Luke v Beauty Bell Enterprises LLC
24A05437	Pamela Perry v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A05442	Cynthia Smith v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A05444	Articia Solomon v AFAM Concept Inc. et al
24A05446	Patricia K. Steverson v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A05447	Hester Walker v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A05642	J'Nae Judkins v Strength of Nature
24A05779	Washita Drake v. Godrej Son Holdings Inc., et al.
24A05797	Diana Hart v. Godrej SON Holdings Inc., et al.
24A05965	Felicia Brown v. Beauty Bell Enterprises LLC, et al.
24A05966	Vickie Coffee-Patterson v. Beauty Bell Enterprises LLC, et al.
24A05967	Cheryl Goss v Godrej SON Holdings et al.
24A06007	Aisha Hubner v. Beauty Bell Enterprises LLC, et al.
24A06008	Tanya Myers v. Beauty Bell Enterprises LLC, et al.
24A06011	Beverly Washington v Beauty Bell Enterprises LLC
24A06013	Sarah Singletary v. Beauty Bell Enterprises LLC, et al.
24A06015	Rosemary McKinney v Beauty Bell Enterprises
24A06016	McLlessya Caldwell v Beauty Bell Enterprises LLC
24A06017	Ingrid Purvis v Beauty Bell enterprises LLC
24A06020	Donia Bernard v Beauty Bell Enterprises LLC
24A06021	Joan Williams v Beauty Bell Enterprises LLC
24A06022	Kizzey Wilson v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A06023	Anette Adams v Beauty Bell Enterprises LLC
24A06024	Lela Leggett v Avlon Industries
24A06025	Trina Brown v Avlon Industries Inc.
24A06027	Marilyn Yarbrow v Beauty Bell Enterprises
24A06031	Brenda Howard v Avlon Industries Inc.

DeKalb County Case No.	Caption
24A06032	Lavella Montgomery v Beauty Bell Enterprises LLC
24A06037	Margie Onuoha v Avlon Industries Inc.
24A06038	Zena Young v Beauty Bell Enterprises LLC
24A06059	Rhonda Jordan v Beauty Bell Enterprises
24A06088	Monica Williams v. L'Oréal USA, Inc., et al.
24A06092	Eva H. Johnson v. Strength of Nature LLC, et al.
24A06177	Gloria M. Woods v. Beauty Bell Enterprises LLC fka House of Cheatham Inc., et al.
24A06232	Lujuana Daniels v. McBride Research Laboratories Inc., et al.
24A06288	Tamra Ellington vs. AFAM Concept, Inc. D/B/A JF Labs, Inc., et al.
24A06305	Deidra Pickett v. AFAM Concept Inc. dba JF Labs, Inc., et al.
24A06307	Bernice Nixon v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A06321	Mildred Leslie v Beauty Bell Enterprises LLC
24A06322	Deborah Battiste v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A06323	Karen Marsh v L'Oréal USA Inc.
24A06344	Jeanette Neal v. AFAM Concept Inc. dba JF Labs Inc., et al.
24A06389	Kenyatta Hendrix v. Beauty Bell Enterprises LLC fka House of Cheatham Inc., et al.
24A06396	Sarah Singletary v. Beauty Bell Enterprises LLC fka House of Cheatham Inc., et al.
24A06440	Tracey Williams v Beauty Bell Enterprises LLC

APPENDIX D**Gwinnett County, Georgia Cases**

Gwinnett County Case No.	Caption
24-C-09879	Jamelia Dawkins v. L'Oréal USA, Inc., et al.
24-C-09589	Lashunda Lewis v. AFAM Concept, Inc., et al.
24-C-09705	Vera Jones v. L'Oréal USA, Inc., et al.
24-C-09761	Louise Hutton v. AFAM Concept, Inc., et al.
24-C-09832	Beth Bonestell v. L'Oréal USA, Inc., et al.
24-C-09872	Norma Thompson v. L'Oréal USA, Inc., et al.
24-C-10075	Thelma Adams v. L'Oréal USA, Inc., et al.

APPENDIX E

New York County, New York Cases

New York County Case No.	Caption
156144/2024	Nathan Deliotte, individually and as Administrator, Estate of Gloria Deliotte, deceased v. L'Oréal USA, Inc., et al.
159701/2024	Janice Barber v. L'Oréal USA, Inc., et al.
150123/2024	Tricia Rance v. L'Oréal USA, Inc., et al.
159683/2024	Sharon George v. L'Oréal USA, Inc., et al.

APPENDIX F**Philadelphia County, Pennsylvania Cases**

Philadelphia County Case No.	Caption
23-0803166	Cheron Walker v. Rite Aid Corporation, et al.
23-0803169	Jean Kamara v. Rite Aid Corporation, et al.
23-0803167	Vanessa Waters and Derek Waters v. Rite Aid Corporation, et al.
23-0900657	Tanda Thompson v. L'Oréal USA, Inc., et al.
24-0701869	Cynthia Bennett v. L'Oréal USA, Inc., et al.
24-0800778	Erica James v. L'Oréal USA, Inc., et al.
24-0901711	Lynda Casurra v. L'Oréal USA, Inc., et al.
24-1002291	Carmen Jones v. L'Oréal USA, Inc., et al.
24-0901497	Jamia Parker v. L'Oréal USA, Inc., et al.
24-1001776	Cynthia Parris v. L'Oréal USA, Inc., et al.
24-1002191	Stacey Truitt v. L'Oréal USA, Inc., et al.
24-1002205	Sandra Curtis v. L'Oréal USA, Inc., et al.
24-1002217	Zelda Graham v. L'Oréal USA, Inc., et al.
24-1002241	Ashanti Brice v. House of Cheatham LLC, et al.
24-1002247	Angelique Ryan v. L'Oréal USA, Inc., et al.
24-1002267	Chestina Lane v. CVS Pharmacy Inc., et al.
24-1002292	Naimah Konate v. L'Oréal USA, Inc., et al.
24-1002303	Melissa Jones v. L'Oréal USA, Inc., et al.
24-1002304	Diana Murdock v. L'Oréal USA, Inc., et al.
24-1002305	Cynthia Fortune v. L'Oréal USA, Inc., et al.
24-1002269	Karen Uqdah v. L'Oréal USA, Inc., et al.
24-1002267	Chestina Lane v. L'Oréal USA, Inc., et al.
24-1002294	Darlene Waller v. L'Oréal USA, Inc., et al.
24-1002293	Jennifer McKnight v. L'Oréal USA, Inc., et al.
24-1002300	Helen Toliver v. L'Oréal USA, Inc., et al.
24-1002302	Katherine Longmire v. L'Oréal USA, Inc., et al.

APPENDIX G

New Castle County, Delaware Cases

New Castle County Case No.	Caption
N24C-10-233 EMD	Esther Nichols v. L'Oréal USA, Inc., et al.