

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

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

Master Docket No. 1:23-cv-00818

MDL No. 3060

Hon. Mary M. Rowland

**PLAINTIFF STEERING COMMITTEE AND SECOND WAVE DEFENDANTS' JOINT  
STATUS REPORT**

As directed by the Court following the March 2025 Case Management Conference, the Plaintiff Steering Committee ("PSC") and the Second Wave Defendants file this Joint Status Report regarding a discovery schedule:

**I.**

**Written Discovery Update**

**Advanced Beauty, Inc. ("ABI"), John Paul Mitchell Systems ("JPMS"), Murrays Worldwide ("Murray's"), RNA and Wella Operations US, LLC ("Wella")**. Since late February 2025, the PSC has served several additional sets of discovery requests on this group of Second Wave Defendants. These additional discovery sets consist of Plaintiffs' 3<sup>rd</sup> through 8<sup>th</sup> Sets of Interrogatories and 2<sup>nd</sup> through 7<sup>th</sup> Sets of Requests for Production,<sup>1</sup> totaling an additional 124 discovery requests on a variety of different topics, specifically: Agreements and Manufacturing, Communications and Hair Relaxer Related Litigation; Marketing; Product Design, Development Studies and Testing; Regulatory and Post-Market Surveillance; and Sales.<sup>2</sup> The PSC and the Second Wave Defendants have been engaged in a productive meet and confer process regarding a discovery schedule for responses to these additional discovery requests with discussions on February 25, March 3, 18, 19, 20, 25, 27, April 3 and 10. As a result of those discussions, the parties have agreed to the following schedule of deadlines for objections and responses to the outstanding discovery sets:

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<sup>1</sup> RNA was served with only 6 sets of Requests for Production.

<sup>2</sup> These Second Wave Defendants were previously served in 2024 with Plaintiffs' First and Second Set of Interrogatories and Plaintiffs' First Request for Production of Documents. Each of these Defendants has now served Objections and Responses to these initial discovery sets on Plaintiffs. Defendants reserve the right to supplement these responses.

<b>Interrogatory Topic</b>	<b>Interrogatory Set and Applicable 2<sup>nd</sup> Wave Defendant</b>	<b>Deadline</b>
Communications/Hair Relaxer Related Litigation	JPMS/RNA/Bronner/Murray's/Wella – Set 4 ABI – Set 3	April 30, 2025
Regulatory, Post Market Surveillance	JPMS/RNA/Bronner/Murray's/Wella – Set 7 ABI – Set 8	May 30, 2025
Agreements & Manufacturing	JPMS/RNA/Bronner/Murray's/Wella – Set 3 ABI – Set 8	June 21, 2025
Marketing	JPMS/RNA/Bronner/Murray's/Wella – Set 5 ABI – Set 6	July 21, 2025
Product Design, Development, Studies and Testing	JPMS/RNA/Bronner/Murray's/Wella – Set 6 ABI – Set 4	August 21, 2025
Sales	JPMS/RNA/Bronner/Murray's/Wella – Set 8 ABI – Set 5	September 21, 2025

<b>RFP Topic</b>	<b>RFP Set and Applicable 2<sup>nd</sup> Wave Defendant</b>	<b>Deadline</b>
Communications/Hair Relaxer Related Litigation	JPMS/RNA/Bronner/Murray's/Wella – Set 3 ABI – Set 4	April 30, 2025
Regulatory, Post Market Surveillance	JPMS/Bronner/Murray's/Wella – Set 7 ABI – Set 8 RNA – Set 6	May 30, 2025
Agreements & Manufacturing	JPMS/RNA/Bronner/Murray's/Wella – Set 2 ABI – Set 3	June 21, 2025
Marketing	JPMS/RNA/Bronner/Murray's/Wella – Set 4 ABI – Set 5	July 21, 2025
Product Design, Development, Studies and Testing	JPMS/RNA/Bronner/Murray's/Wella – Set 5 ABI – Set 6	August 21, 2025
Sales	JPMS/Bronner/Murray's/Wella – Set 6 ABI – Set 7	September 21, 2025

**Dudley Beauty Corp., LLC.** Dudley Beauty has not been served with discovery at this time. Per the Court's Order on December 17, 2024 [Doc. 992], Plaintiffs were instructed to serve Dudley with initial discovery requests by January 6, 2025. To date, Dudley Beauty has not been served with discovery. Accordingly, Dudley Beauty's position is that the opportunity to serve it with any discovery has passed. The PSC is investigating the discovery that was intended to be propounded on Dudley that appears to have been on a different schedule than the other Second Wave Defendants and will re-serve or serve same promptly.

**Roux Laboratories.** Roux Laboratories was served with multiple sets of discovery in 2024. Currently briefed and pending before Special Master Grossman is Roux's request that it be relieved of the requirement to file objections and responses to these discovery requests and that it be allowed to rely on the responses and documents produced by Revlon, which responses are relevant to and include documents related to Roux.

## II.

### **Second Wave Defendant Pending Case Count**

Over 12,000 cases have been filed in the MDL to date. During the March Case Management Conference, the Court requested that each Second Wave Defendant provide the number of cases in which it has been named as a defendant and the number of those cases which have been served. The requested information is set forth below to the best of each Defendants' knowledge regarding the number of cases filed:

**Advanced Beauty, Inc.**

114 cases filed; 99 served

**Bronner Brothers**

48 cases filed; 44 served

**Dudley Beauty Corp., LLC**

183 cases filed; 128 served

**John Paul Mitchell Systems**

88 cases filed; 60 served

**Murrays Worldwide**

50 cases filed; 31 served

**RNA**

147 cases filed; 120 served

**Roux Laboratories**

97 cases filed; 97 served

**Wella Operations US, LLC**

12 cases filed; 4 served

Dated: April 11, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Nancy Patterson, certify that I filed the foregoing *Plaintiff Steering Committee and Second Wave Defendants' Joint Status Report* using the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record on this 11th day of April, 2025.

s/ Nancy Patterson