

**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
APRIL 24, 2025 STATUS CONFERENCE BEFORE
THE HONORABLE MARY M. ROWLAND**

Co-Lead Counsel for Plaintiffs and counsel for Defendants provide this joint status report in advance of the status conference scheduled for April 24, 2025.

I. **CMO 15 – Phase II/Bellwether Discovery Status**

Plaintiffs’ Position:

Defendants belatedly drafted their below position and shared it with the PSC for the first time mere hours before the JSR was due. The PSC was and remains surprised by Defendants’ stance that the parties are at an impasse over these issues, as it is contrary to the PSC’s understanding that additional meet and confers on the proffered Defendant Fact Sheet (“DFS”) would be beneficial and that the parties would meet again in the near future. However, given Defendants’ position that the parties are at an impasse and that they claim court intervention is needed before any further discussions can move forward, again, which the PSC did not believe to be the case following our single meeting, and considering the large scope of these disputed issues, the PSC submits that the most efficient course of action would be for each individual bellwether plaintiff to serve case-specific interrogatories, document demands, and requests for admission (as necessary) once selected, rather than for the parties to engage in a contentious DFS process any longer.

Defendants’ Position:

The Parties discussed the areas of significant disagreement with Plaintiffs’ proposed DFS with the Court at the March CMC, and subsequently provided Plaintiffs with proposed edits to their draft as requested. The Parties then met and conferred on April 16, 2025 to discuss potential alignment on the scope and substance of Plaintiffs’ discovery requests. The Parties were unable to reach agreement on any issues during that meeting and it was the Defendants’ understanding that they would receive Plaintiffs’ proposed changes to the DFS and their position regarding the DFS prior to

submission of this status report. Defendants had not, at the time of this filing, received such information.

While there are several points of disagreement between the Parties' proposals as submitted, these disputes appear to boil down to three threshold issues: (1) the DFS only can apply to the 32 Bellwether plaintiffs; (2) the requests for information and productions within the DFS cannot be duplicative of discovery previously served on defendants as general discovery closed on February 28, 2025 (even if plaintiffs claim it is case-specific); and (3) questions that go to expert causation opinions are reserved for the expert discovery phase of the bellwether process. These issues were the same ones addressed at the March CMC, and the Defendants' inclusion of them here for discussion at the April CMC should come as no surprise to Plaintiffs. Defendants' proposed edits to Plaintiffs' DFS sought to clarify that the DFS was indeed limited to these 32 Bellwether plaintiffs, and refine the scope of overly generic and broad general inquires which were tantamount to general discovery interrogatories. Defendants expect that a decision on these three points would likely facilitate a productive and efficient meet and confer that could result in an agreed DFS. Should Plaintiffs no longer wish to proceed with a DFS, resolution of these issues would still streamline objections and responses to whatever case-specific discovery they ultimately serve.

First, as discussed at length at the March CMC, it is Defendants' position that the DFS should be required *only* for the 32 Bellwether cases that are ultimately selected by this Court and the Parties under CMO 15, and be used to facilitate the exchange of information *specifically* related to these 32 Bellwether plaintiffs. Despite the Court's admonition at the March CMC that Plaintiffs were not entitled to a docket-wide DFS, Plaintiffs refuse to limit the DFS to the Bellwether cases, remaining steadfast in their position that – following 18 months of broad ranging discovery from defendants – Defendants be required to complete the DFS for *every plaintiff in the MDL* now and into the future. *See* March 27, 2025 Hearing Trans. at 26:9-13 (“So doing it because they're pursuing the plaintiff fact sheets that are out there, that's not a good reason. That's not a good reason. Don't respond. That's not a good reason because the tit-for-tat thing.”). Plaintiffs' position would result in backtracking discovery, rendering the February 28, 2025 written discovery deadline meaningless, and grossly expanding the current exercise into an overly burdensome and unreasonable obligation on Defendants to potentially respond to more than 9,000 DFSs in addition to the hundreds of interrogatories and requests for production Defendants have already responded to during the now-closed general written discovery phase of this litigation.

Second, Plaintiffs' proposed DFS seeks duplicative information of written discovery that Defendants have already responded to. For example, the DFS includes questions regarding “Product Identification” that ask each Defendant to identify – for each of their products included by a Bellwether Plaintiff in her PFS and over the entire period of time the product is alleged to have been used – the components, ingredients, and formulas for the product. This exact information was already requested by Plaintiffs in the very first interrogatories served in June 2023. Defendants' responses to those interrogatories were the subject of multiple court conferences and meet and confers

before both this Court and Magistrate Judge Finnegan. This demonstrates two points: (1) the information requested and requests themselves are not case specific discovery; and (2) repackaging it as “plaintiff-specific” will not secure different information from Defendants. Because Plaintiffs already have the information they are requesting, there is no basis to support these requests. Although Plaintiffs now claim to need that information for each individual plaintiff, they are equally able to take the previously provided information and apply it the 32 Bellwether Plaintiffs. (And to the extent that Plaintiffs claim not to have particular information from a particular defendant, they have been more than capable of raising those alleged deficiencies with the Court). Recognizing the ample discovery Defendants already have responded to, Defendants’ proposed edits to Plaintiffs’ DFS seek to refine the scope of the DFS to eliminate questions that are duplicative of discovery requests previously issued or are generic in nature and thus defeat the purpose of the second phase of written discovery, which should be more specific to the individual case at issue.

Third, Plaintiffs’ proposed DFS included a series of questions related to causation under the guise of “contention” questions. For example, Plaintiffs ask Defendants to “state all facts” supporting the defense that Hair Relaxer Products do not cause the alleged injuries, or the basis for any defense that another product identified in the PFS caused the alleged injuries. Such inquiries should be directed to case specific experts (whose reports are due on August 3, 2026 (Dkt. 1120 at VII.10), rather than Defendants. Plaintiffs’ insistence on such information now is particularly ironic given their continued resistance to providing any information regarding their own theories of causation. The DFS is not the appropriate avenue for such questions.

Defendants will be prepared to discuss these issues, as well as any specific questions the Court may have about the scope of the proposed DFSs or case-specific discovery, at the April Case Management Conference, as appropriate.

II. **“Second-Wave” Defendants**

Proposed Discovery Schedule: As discussed at the March 27, 2025 Case Management Conference and memorialized in the Court’s Minute Entry [ECF 1150], on April 11, 2025 the PSC and the Second Wave Defendants filed a Joint Status Report, which included an agreed upon proposed schedule for the Second Wave Defendants to respond to the propounded discovery [ECF 1170], which the Court adopted on April 14, 2025 [ECF 1174]. The parties will provide an update on the discovery served or intended to be served on Dudley Beauty Corp., LLC and Roux Laboratories at the April 24, 2025 Case Management Conference.

III. **Amended CMO 10 Compliance and Order to Show Cause Process:** On March 28, 2025, the Court ordered 89 Plaintiffs to “upload Plaintiff’s information (name, DOB, address, SSN even a partial SSN) and a certification of good faith efforts to comply

with Amended CMO 10 on MDL Centrality by 4/11/25.” ECF No. 1152. According to the MDL Centrality reports no. 1237 and no. 1209, both dated April 14, 2025, two (2) Plaintiffs have not yet complied with the Court’s Order. The Parties have attached a list of the noncompliant Plaintiffs as Exhibit A.

IV. **Class Certification Deadlines (Defendants)**
Defendants’ Position:

Defendants request that the Court set a deadline for Plaintiffs to file their Motion for Class Certification. Plaintiffs filed their Consolidated Class Action Complaint on August 14, 2023 and Defendants filed their Answer on November 12, 2024. Discovery is ongoing, with depositions of Defendants to be completed by September 30, 2025. Defendants further propose that, after Plaintiffs file their Motion for Class Certification, the parties meet and confer and provide the Court with a proposed briefing schedule for the Opposition and Reply to the Class Certification Motion along with any Daubert challenges. Setting those dates at this time would be premature since the parties do not yet know the number of putative class representatives and experts that would need to be deposed. On April 8, 2025, the parties exchanged their list of topics to be included in this month’s JSR. Defendants’ topics included a request for a class certification motion deadline, which Defendants had previewed with Magistrate Judge Jantz during the March discovery conference. Defendants also reached out to Plaintiffs to discuss potential motion dates. Plaintiffs offered April 18, 2025 as the earliest date they were available to meet and confer. As this date is after the JSR filing deadline, Defendants will be prepared to update the Court regarding the parties’ discussions during the Case Management Conference.

Plaintiffs’ Position:

The PSC learned of the Defendants’ request to advance the class cases on a separate track in this Joint Status Report, rather than through a meet and confer request. The parties have agreed to engage in their first meet and confer on this topic on Friday, April 18, 2025 and the PSC hopes to discuss a mutually convenient schedule consistent with class scheduling in other MDLs where the class action(s) typically lag behind the underlying products liability case. Given the timing of the first meet and confer, the PSC does not believe that this issue is ripe for court intervention at this time.

V. **Science Day**

Defendant’s Position: In this Court’s Order regarding the Bellwether Selection Schedule and Procedures [ECF 1052], the Court indicated that it would host a science day but schedule it separately from the bellwether procedures. Defendants have proposed to the Plaintiffs that the parties proceed with a science day on in August on a date convenient to the Court. This would be well-timed, given it is when expert discovery and expert disclosures begin.

Plaintiffs' Position: The parties have agreed on a protocol for the process by which we draft and submit the Joint Status Reports, which includes the exchange of topics followed by a meet and confer prior to the exchange of any draft. The Defendants violated this agreement by (1) not including the issue of science day on their proposed topic list, and (2) still not raising it during the subsequent JSR specific meet and confer. The PSC requested that this topic be removed from this month's status report and addressed in May, so that ample meet and confer time could be had, but Defendants refused.

Given the belated disclosure of this issue for the JSR (as reported above in violation of the parties standing agreement to disclose), the PSC presently is still trying to communicate with its members given certain holidays at this time and the PSC will either have a supplement in this JSR or will be prepared to discuss the potential timing of science day at the Case Management Conference in April or at the May Case Management Conference, which is when the PSC believes it to be more appropriately addressed under these circumstances.

VI. **Pro Se Plaintiff Update/ Motions to Withdraw (Defendants)**

There are now currently 34 pro se plaintiffs in the MDL.

At the Pro Se Conference held on March 27, 2025, the court addressed five Motions to Withdraw and granted the applications. The filing of Motions to Withdraw is ongoing, and 14 additional applications are currently pending. J. Rowland advised counsel at the March 27 Pro Se Conference that she is likely to schedule the next Pro Se Conference for May 2025.

To the extent there are any unresolved issues, Defense and Plaintiff Pro Se Liaison Counsel will be prepared to address them at the Case Management Conference, if necessary.

VII. **State Court Update (Defendants)**

Illinois State Cases:

There are at least 400 cases pending in Cook County. The cases have been consolidated for pre-trial purposes and will be consolidated in cohorts of five cases for trial. The cases were pending for pre-trial discovery and motion practice before Judge Patrick Stanton, who has been reassigned, and the parties believe that the case will be reassigned to Judge Sarah Johnson. The cases are also being directed by the presiding judge of the Law Division, Judge Kathy Flanagan.

On January 8, 2025, Judge Flanagan set four trial dates for the consolidated cases. Pursuant to her order, the partes are to select twenty cases that will be separated into four cohorts of five cases that will be tried together at four separate cohort

trials. The trials are set to begin November 3, 2025, January 20, 2026, March 23, 2026, and May 18, 2026. The plaintiffs for each trial setting are currently unknown, and the injuries that will be at issue for each trial currently unknown.

On April 23, 2025, the parties have a status hearing before Judge Flanagan to discuss the viability of the trial dates on account of the lack of a judge to handle pending jurisdictional and pleadings motions as well as cohort selection needed for the parties to proceed with individual case discovery. The Defendants will be prepared to discuss the results of that hearing at the April 24, 2025 hearing. The parties also have a hearing with the newly assigned motion Judge for consolidated cases on April 23, 2025. The Defendants will be prepared to discuss the outcome of this hearing on April 24, 2025.

Additionally, there is currently one case pending in St. Clair County that was recently filed.

Georgia State Cases:

There are at least 384 cases pending in Chatham County, Georgia. 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 December 10, 2024, the Georgia Supreme Court granted certiorari on the following issue: "In a tort action alleging an injury caused by the use of multiple units of a consumable product over time, when is the 'first sale for use or consumption of the personal property causing or otherwise bringing about the injury,' at which point the statute of repose begins to run? See O.C.G.A. § 51-1-11(b)(2)." Oral argument is scheduled for May 13, 2025. The consolidated matters are stayed, as the trial court is lacking jurisdiction over the same pending resolution of this appeal.

There are also at least 200 cases pending in DeKalb County, Georgia. These cases are being consolidated for pretrial purposes before Judge Alvin T. Wong. During status conferences held on January 17, 2025 and April 7, 2025, the Court indicated that its preference would be to address general causation and/or expert challenges early on. A master complaint was filed on March 24, 2025. The parties are continuing to meet and confer regarding the substance of a short form complaint, and are to update the Court regarding the same by April 30th. On the same date, the parties are to propose briefing schedules for jurisdictional, venue challenges and statute of limitations challenges.

Philadelphia State Cases:

There are at least 24 cases pending in Philadelphia County, Pennsylvania. On April 3, 2025, Judge Daniel J. Anders, Administrative Judge of the Trial Division, issued

a rule to show cause as to why these matters should not be coordinated through the Complex Litigation Center's Mass Tort Program. All briefs in support of or in opposition to coordination are to be filed by April 21, 2025, and any reply briefs are due to be filed by April 25, 2025.

California State Case

There is currently one case in California. A demurer hearing has been set.

New York State Case

There are currently five cases pending in New York. All cases remain in the pleading stage before Judge Mary Rosado. In particular, on April 9, 2025, Judge Rosado issued her ruling in the *Rance* case, granting in part and denying in part Defendants' motions to dismiss. Defendants are to file answers by May 1, 2025 and the parties are to submit a proposed preliminary conference order by July 21, 2025. In the *Deliotte* case, a hearing on Defendants' motions to dismiss has been set for May 6, 2025.

Delaware State Case

Plaintiff Esther Nichols filed her Complaint on October 17, 2024 against 14 Defendants asserting causes of action for Strict Liability, Negligence, Gross Negligence, Negligent Misrepresentation, Fraud, Fraudulent Concealment, Medical Monitoring, and Punitive Damages. All Defendants except one have entered their appearances and filed Motions to Dismiss under Rules 12(b)(1), 12(b)(6) and 9(b), under various theories. Once the remaining Defendant enters its appearance and files its Motion to Dismiss (which should be in the next two weeks), the Parties will schedule the dates for the Plaintiff's combined answering brief, the Defendants' reply briefs and oral argument. The case has been assigned to Judge Eric M. Davis of the Delaware Superior Court, in New Castle County.

VIII. Status of Pending Briefs/Motions/Orders

- a. **L'Oréal S.A.'s Motion to Dismiss**: On September 16, 2024, L'Oréal S.A. filed a motion to dismiss [ECF 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 [ECF 899]. L'Oréal S.A. filed its Motion to Dismiss on December 6, 2024 [ECF 978]. Pursuant to the Court's December 16, 2024 Minute Entry [ECF 989], Plaintiffs filed their Response January 24, 2025 [ECF 1038]. L'Oréal S.A. filed their Reply on February 21, 2025 [ECF 1103].
- b. **Objections to Magistrate Judge Jantz's January 31, 2025 Minute Entry**: As discussed at the February 13, 2025 Case Management Conference and

memorialized in the February 24, 2025 Minute Entry, Defendants filed their objections to an order entered by Magistrate Judge Jantz regarding the necessity of raising admissibility objections during depositions [ECF 1085]. Plaintiffs filed their response on February 28, 2025 [ECF 1110]. Defendants filed their Reply on March 7, 2025 [ECF 1124].

- c. **NIH Motion to Compel**: On January 24, 2025, Revlon filed a motion to compel the production of documents from the National Institutes of Health [ECF No. 1034]. Following the February Case Management Conference, a briefing schedule was set [ECF 1081] and extensions were then granted [ECF 1106, 1137, and 1162]. The NIH filed their response to the motion to compel on April 22, 2025 and Revlon's reply is due May 13, 2025.
- d. **Appointment of Settlement Special Master**: As discussed at the March 27, 2025 Case Management Conference and memorialized in the Court's Minute Entry [ECF 1150], on April 10, 2025, the parties filed Ms. Reisman's Declaration pursuant to Rule 53(b)(3)(A), stating that there are no grounds for disqualification under 28 U.S.C. §455 [ECF 1165]. The parties submitted a proposed Case Management Order for the Court's consideration on April 14, 2025. The parties will be prepared to discuss with the Court at the April 24, 2025 Case Management Conference, if necessary.
- e. **Re-Application and Re-appointment of Plaintiff Steering Committee**: As discussed at the March 27, 2025 Case Management Conference and memorialized in the Court's Minute Entry [ECF 1150], on April 14, 2025, the PSC submitted a proposed order for the Court's consideration regarding the yearly reappointment of the plaintiffs' leadership committees. The PSC will be prepared to discuss this proposed order with the Court, if necessary, at the April 24, 2025 Case Management Conference.

Dated: April 17, 2025

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Exhibit A

Plaintiff First Name	Plaintiff Last Name	Firm	MDLC ID	Case No.	Filing Date	Bench ruling	DOB	Valid SSN?	Street Address	SSN	Certificate Doc Name
TINA	MORELAND	Walton Telken, LLC	11979	1:24-cv-00896	1/31/24	upload+certify by 4/11	01/00/1900	Not provided	Not provided	Not provided	Not provided
Sondra	Roberts	Law Offices of Spar & Bernstein PC	Never registered	1:24-cv-10448	8/29/24	upload+certify by 4/11	Not provided	Not provided	Not provided	Not provided	Not provided