BEFORE THE UNITED STATES JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

IN RE: HAIR RELAXER MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	**MDL No.: 3060**

INTERESTED PARTY RESPONSE AND MEMORANDUM OF PLAINTIFF ELIZABETH THOMPSON IN SUPPORT OF MOTION FOR TRANSFER OF PRETRIAL PROCEEDINGS PURSUANT TO 28 U.S.C. § 1407

Pursuant to 28 U.S.C. §1407 and Rule 6.2 of the Rules of Procedure of the United States Judicial Panel on Multidistrict Litigation, by and through her undersigned counsel ("Plaintiff") submits this Interested Party Response in support of the Motion for Transfer of Actions for Coordinated Pretrial Proceedings ("Motion") filed by Plaintiff Jenny Mitchell.

Centralizing pending and future related actions in a single transferee district will preserve the resources of the parties and the judiciary, eliminate duplicative discovery, prevent inconsistent pretrial rulings, and advance a just and efficient conduct of the actions.

I. FACTUAL BACKGROUND

The actions arise out of injuries caused by the use of Chemical Hair Relaxers. Chemical Hair Relaxers are products designed to straighten naturally curly hair. These products have been sold since the 1970s and are overwhelmingly marketed and sold to African American women. Between 65-80% of African American routinely use Chemical Hair Relaxers, and annual sales are routinely in excess of several hundred million dollars.[1]

[1] L'Oreal USA, Inc. et al.; Competitive Impact Statements and Proposed Consent Judgments, 65 Fed. Reg. 51,024 (Aug. 22, 2000).

The market for women's hair relaxers is highly concentrated. Defendant L'Oreal, along with its subsidiaries and predecessors in interest, has long been one of the most significant participants in the hair relaxer market. A federal antitrust complaint filed by the Department of Justice in 2000 stated that "the market for adult women's hair relaxer kits is highly concentrated under a standard measure of market concentration employed by economists" and "after acquiring Carson, L'Oreal would dominate the market".[2] While L'Oreal entered into a consent judgment that required it divest two Carson brands, its acquisition of Carson was allowed to proceed.[3]

The National Institutes of Health conducted a large-scale prospective epidemiological study called the Sister Study, which evaluated the risks of Chemical Hair Relaxer use. The Sister Study enrolled 50,884 women beginning in 2003, and has tracked their health outcomes over the last two decades. Reports from the Sister Study have shown that frequent users of Chemical Hair Relaxers have substantially higher risks of several endocrine-related cancers than non-users. For example, frequent users of Chemical Hair Relaxers were found to be 2.78 times more likely to suffer uterine cancer, and 2.19 times more likely to suffer ovarian cancer, when compared to non-users.[4] Additional studies, beyond the Sister Study, support these findings and indicate that the Defendants' products are causing cancers in women via endocrine disruption.

Plaintiff is one of the thousands of women who have developed endocrine-related cancers after frequent use of Chemical Hair Relaxers. She, like Plaintiffs in other pending actions, seeks compensation for the damages associated with her endocrine-related cancer based on common

[2] Id.
[3] Id.
[4] Chang et al., *Use of Straighteners and Other Hair Products and Incident Uterine Cancer*, Journal of the National Cancer Institute (Oct. 17, 2022); White et al., *Use of Hair Products in Relation to Ovarian Cancer Risk*, Carcinogenesis (Jun. 26, 2021).

law theories such as negligence, breach of warranty, and strict liability and statutory remedies relating to products liability and consumer protection.

II. CENTRALIZATION OF THESE ACTIONS UNDER 28 U.S.C. § 1407 IS APPROPRIATE, AND WILL PROMOTE THE JUST AND EFFICIENT CONDUCT OF THE ACTIONS

Plaintiff agrees that centralization of these actions is appropriate and desirable. These actions share key factual questions, including: Does Chemical Hair Relaxer use cause endocrine-related cancers? Did Defendants know that their Chemical Hair Relaxer products cause endocrine-related cancers? Did Defendants knowingly include hormonally active ingredients in their products? Did Defendants adequately test the safety of their products? The core legal theories presented by these questions, including negligence, failure to warn, and violation of consumer protection laws, are similar amongst the filed actions.

Resolving these common factual and legal questions will require extensive expert discovery, voluminous documentary discovery, and a large number of fact depositions. Centralizing these immense efforts before one judge will conserve the time and effort of the parties, attorneys, witnesses and courts, reduce overall litigation costs, eliminate duplicative discovery, and ensure consistent pretrial rulings.

The size of this litigation further weighs in favor of centralization. During the pendency of the Motion, the number of plaintiffs in pending actions has increased from thirteen to at least twenty-six. It is very likely that the number of plaintiffs in pending actions will continue to increase. Based on the large percentage of African American women who are frequent users of Chemical Hair Relaxers (65-80%), and incidence rates of endocrine-related cancers such as Uterine Cancer and Ovarian Cancer, a significant amount of future filed actions can be expected.

In an attempt to obscure the common issues presenting by these actions, Defendant L'Oreal USA claims that it "occupies a relatively small portion of the hair relaxer market".[5] L'Oreal provides no support for this statement, and omits any further description of its market power during the relevant time period.[6] However, as discussed above, L'Oreal, its predecessors in interest, and its subsidiaries, have dominated this market. As a result, resolution of this litigation will necessarily involve questions relating to these L'Oreal entities. Such questions will be common to the litigation, even though plaintiffs in presently filed actions have used Chemical Hair Relaxers manufactured by both L'Oreal and non-L'Oreal Defendants. A multiple defendant MDL is the most appropriate option here, where one defendant (L'Oreal) has dominated the market, and plaintiffs are likely to be exposed to more than one defendant's product. Similar facts persuaded the Panel to centralize an industry-wide MDL in *In re: Testosterone Replacement Products Liability Litigation* (MDL No. 2545, 2:14-cv-00946, Doc. 49) ("Significantly, in the actions and potential tag-along actions already filed, a number of plaintiffs used more than one testosterone replacement therapy. The other approaches proposed by the parties…likely would delay the resolution of the common core issues in this litigation.") As was the case in *In re: Testosterone Replacement Products Liability Litigation* (MDL No. 2545), the complexities presented by mixed use cases further weighs in support of centralization, and renders informal coordination unfeasible for the current actions. Instead, coordination short of centralization is likely to delay the ultimate dispensation of these actions, and do so at great waste to the resources of the parties and the judiciary.

L'Oreal's argument that centralization should be denied because the filed actions discuss numerous endocrine-related effects of Chemical Hair Relaxers should be similarly unpersuasive.

[5] Doc. 25, p. 8
[6] Plaintiff alleges exposure to hair relaxer products over the course of several decades.

While there are a number of hormonal impacts of Chemical Hair Relaxers, plaintiffs in the present actions have only sought compensation for endocrine-related cancers. Again, the Panel's Order *In re: Testosterone Replacement Products Liability Litigation* (MDL No. 2545) is instructive. In that case, the Panel consolidated cases relating to several injuries (heart attack, stroke, deep vein thrombosis, and pulmonary embolism) involving similar mechanisms relating to the thromboembolic effects of hormonal drugs. Like the injuries in MDL 2545, the female reproductive cancers for which relief is sought in the present actions share common mechanisms—the estrogenic impacts and related endocrine disruption of Chemical Hair Relaxers.

III. THE NORTHERN DISTRICT OF ILLINOIS IS THE MOST SUITABLE VENUE

Plaintiff agrees that centralization in the Northern District of Illinois would provide the best venue for these matters. As discussed above, these cases present similar issues as *In re: Testosterone Replacement Products Liability Litigation* (MDL No. 2545), which was transferred to the Honorable Judge Matthew F. Kennelly in that District. Judge Kennelly presides over the first-filed case in this litigation as well, and would be well suited to oversee the complex issues presented by these cases. The Northern District of Illinois is the current nexus of litigation, and represents half of the currently filed actions.

IV. CONCLUSION

WHEREFORE, Plaintiff respectfully requests, pursuant to 28 U.S.C. §1407, that the Panel enter an Order transferring the pending actions, as well as related actions that might later be filed, to the United States District Court for the Northern District of Illinois for centralized pretrial proceedings.

Date: January 3, 2023

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 3, 2023 a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel either via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Rene F. Rocha

Rene F. Rocha

UNITED STATES JUDICIAL PANEL ON MULTIDISTRICT LITIGATION

MDL No. 3060 & TITLE - IN RE: Hair Relaxer Marketing

Case Caption (Include Plaintiff, District, and Civil Action No.) (attach list if necessary):

Elizabeth Thompson v. L'Oréal USA, Inc., et al. D. Maryland 8:22-cv-03365-AAQ

CORPORATE DISCLOSURE STATEMENT

The undersigned counsel for Elizabeth Thompson, (attach list if necessary) certifies that this party is a non-governmental corporate party and that:

☐ This party's parent corporation(s) are listed below:

☐ The following publicly-held corporation(s) own 10% or more of the party's stock (attach list if necessary):

OR

☑ This party does not have any parent corporations; and no publicly-held corporation owns 10% or more of the party's stock.

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Instructions:

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BEFORE THE UNITED STATES JUDICIAL PANEL

ON MULTIDISTRICT LITIGATION

IN RE: Hair Relaxer Marketing, Sales

Practices, and Products Liability Litigation **MDL No. 3060**

CERTIFICATE OF SERVICE

In compliance with Rule 4.1(a) of the Rules of Procedure for the United States Judicial Panel on Multidistrict Litigation, I hereby certify that copies of the foregoing **INTERESTED PARTY RESPONSE and this CERTIFICATE OF SERVICE** was served by First Class U.S. Mail and/or electronic mail on January 3, 2023, to the following:

Rhonda Terrell v. L'Oréal USA, Inc., et al., No.1:22-cv-09008-VEC (S.D.N.Y.)

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