

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

***IN RE:* ALLERGAN BIOCELL
TEXTURED BREAST IMPLANT
PRODUCT LIABILITY LITIGATION**

**THIS DOCUMENT RELATES TO:
ALL CASES**

**Case No. 2:19-md-02921(BRM)(LDW)
MDL No. 2921**

JUDGE BRIAN A. MARTINOTTI

**MAGISTRATE JUDGE LEDA DUNN
WETTRE**

**CASE MANAGEMENT ORDER NO. 36
(Order Governing Product-In-Place Plaintiffs)**

I. SCOPE OF ORDER

As of September 25, 2025, there are approximately 350 personal injury plaintiffs with pending cases in MDL 2921 whose claims do not include a diagnosis of BIA-ALCL or having underwent an explant/revision surgery (“Product-In-Place Plaintiffs”). *See* Exhibit A hereto. This Case Management Order (“CMO”) establishes guidelines and procedures pursuant to the Parties’ agreement for a fifteen percent (15%) sample of Plaintiff case-specific discovery to be conducted in these cases via a Short-Form Plaintiff Fact Sheet and a Short-Form Defendant Fact Sheet process.

II. DISCOVERY

A. On September 30, 2025, a random sample of 50 Product-In-Place Plaintiffs shall be selected who will thereafter, within forty (40) days, serve a Short-Form Plaintiff Fact Sheet (“SF-PFS”) in the form attached hereto as Exhibit B, through MDL Centrality. Plaintiffs will conduct the random sample using a random number generated in Microsoft Excel, and Allergan shall then have the right to review the methodology and approve the sample process.

B. For each Product-In-Place Plaintiff who serves a completed SF-PFS, the Allergan Defendants will serve a corresponding Short Form Defendant Fact Sheet (“SF-DFS”) in the form attached hereto as Exhibit C within forty (40) days from the date of service of a completed SF-PFS, through MDL Centrality.

C. The Parties will report to the Court at the next Case Management Conference, currently set for October 14, 2025, concerning the status of the Product-In-Place Plaintiffs.

It is SO ORDERED.

Date: October 6, 2025

BY THE COURT:

A handwritten signature in black ink, appearing to read "Brian R. Martinotti", written over a horizontal line.

Hon. Brian R. Martinotti, USDJ

EXHIBIT A

Filed	Counsel
Burke, Rebecca	Wittels McInturff Palikovic
Valentino, Deborah	The Yost Legal Group
Ameen, White, Kelly	Allan Berger & Associates
Baron, Dawn	Allan Berger & Associates
Brown, Dana	Allan Berger & Associates
Capetta, Desiree	Allan Berger & Associates
Corass-Smith, Naomi	Allan Berger & Associates
Felder, Mary	Allan Berger & Associates
Kent, Jeanette	Allan Berger & Associates
Mitchell-Gallagher, Shelley	Allan Berger & Associates
Naquin, Dawn	Allan Berger & Associates
Nolan-Dischler, Lorraine	Allan Berger & Associates
Oxford, Melissa	Allan Berger & Associates
Resendez, Danielle	Allan Berger & Associates
West, Lauren	Allan Berger & Associates
Huh, Ariel	Ask LLP
Kang, Jessie	Ask LLP
Kim, Ahyoung	Ask LLP
Kim, Eunsook	Ask LLP
Kim, Sa Rah	Ask LLP
Kim, Yoon Nam	Ask LLP
Nguyen, Jinajung	Ask LLP
Park, Sanguen	Ask LLP
Yang, Jihyeon	Ask LLP
Yie, Yugin	Ask LLP
Morrice, Natalie Jayne	Beggs & Lane
Handy, Andrea	Bentley & More
Ross, Ekaterina	Bentley & More
Whaley, Sherri	Bentley & More
Leslie, Linda	Bentley More/Panish
Percz, Alyssa-Ann	Bentley More/Panish
Adair, Susan	Berger Montague
Busch, Lynne	Berger Montague
Cordero, Bernice	Berger Montague
Curry, Kawana	Berger Montague
Duval, Rebecca	Berger Montague
Forshey, Kimberly	Berger Montague
Ivey, Paula	Berger Montague
Jones, Jenna	Berger Montague
Poling, Tammi	Berger Montague
Stahl, Sarah	Berger Montague
Wargo, Kristina	Berger Montague
Womack, Louise	Berger Montague
Alexander, Sharlene	Berger Montague PC
Aucoin, Andrea	Berger Montague PC

Cortez, Melissa	Berger Montague PC
Purdy, Samantha	Berger Montague PC
Ringler, Tiffany	Berger Montague PC
Schelles, Michelle	Berger Montague PC
Skaggs, Mary	Berger Montague PC
Tate, Hannah	Berger Montague PC
Young, Barbara	Berger Montague PC
Harms, Kelli	Berger Montague/Mazie Slater Katz Freeman
Messick, Melissa	Berger Montague/Mazie Slater Katz Freeman
Daniels, Dixie	Berger Montague/Mazie Slater Katz Freeman
Lenard, Debbie	Berger Montague/Mazie Slater Katz Freeman
Base, Rebecca	Brenske Andreevski & Krametbauer
Adams, Linda	Colson/Grossman
Adkins, Lois	Colson/Grossman
Arango, Lillian	Colson/Grossman
Boucle, Patricia	Colson/Grossman
Churchill-Walsh, Ruth	Colson/Grossman
Cornell, Molly	Colson/Grossman
DeChellis, Pamela	Colson/Grossman
Denault, Dawn M.	Colson/Grossman
Dishaw, Kimberly	Colson/Grossman
Dreitz, Blenda	Colson/Grossman
Faraco, Miriam	Colson/Grossman
Fernandez, Susan	Colson/Grossman
Gusman, Aline	Colson/Grossman
Holloway, Starlyn	Colson/Grossman
Levy, Sharon	Colson/Grossman
Morales, Delia	Colson/Grossman
Rodriguez, Graciela	Colson/Grossman
Rose, Diane	Colson/Grossman
Rosi, Irene	Colson/Grossman
Rosselli, Julie	Colson/Grossman
Soto, Jessie L.	Colson/Grossman
Strochak, Debra G,	Colson/Grossman
Sullivan, Jacqueline Alastra	Colson/Grossman
Williams, Amanda L.	Colson/Grossman
Bock, Melody	Cowper Law
Saade, Wendy	Cowper Law
Wykle, Anna	Cowper Law
Brezany-Adams, Martha	Cutter Law
Garcia, Tonya	Cutter Law
Perez, JoAnne	Cutter Law
Russ, Deanna	Cutter Law
Gentry, Amanda	David Randolph Smith & Associates
Fallo, Chazzie	Discon Law Firm LLC
Howard, Melinda	Fegan Scott, LLC

Massie, Margaret	Fegan Scott, LLC
Newman, Ellen	Fegan Scott, LLC
Wagner, Joann	Fegan Scott, LLC
Burch, Cynthia Monroe	Frazer PLC
Borne, Sharon	Gainsburgh Benjamin
Chang, Misoon	Gaw Poe Lawyers
Cho, Haejung	Gaw Poe Lawyers
Cho, Insun	Gaw Poe Lawyers
Choi, Sunmi	Gaw Poe Lawyers
Hwang, Seoyan	Gaw Poe Lawyers
Kang, Yunmee	Gaw Poe Lawyers
Kil, Eunkyung	Gaw Poe Lawyers
Kim, Jiohe	Gaw Poe Lawyers
Kim, Jungbin	Gaw Poe Lawyers
Kim, Seungshin	Gaw Poe Lawyers
Kim, Sunkyung	Gaw Poe Lawyers
Kwak, Mihwa	Gaw Poe Lawyers
Lee, Eunju	Gaw Poe Lawyers
Lee, Jungyun	Gaw Poe Lawyers
Lee, Myunghwa	Gaw Poe Lawyers
Lee, Yunjung	Gaw Poe Lawyers
Moon, Soohkee	Gaw Poe Lawyers
Park, Daborah	Gaw Poe Lawyers
Park, Sujin	Gaw Poe Lawyers
Shin, Yunjae	Gaw Poe Lawyers
Wei, Choonyup	Gaw Poe Lawyers
Huff, Terri Linn	Germany Law
Aguilar, Patricia	Ghozland Law Firm
Alldredge, Glynda	Ghozland Law Firm
Brantley, Debra	Ghozland Law Firm
Castaneda, Irasema	Ghozland Law Firm
Clement, Cindy	Ghozland Law Firm
Dieck, Nancene	Ghozland Law Firm
Edwards, Vanessa	Ghozland Law Firm
Frenette, Kelly	Ghozland Law Firm
Hodge, Lakisha	Ghozland Law Firm
Holliday, Amy	Ghozland Law Firm
Ibarra, Thelma	Ghozland Law Firm
Klype, Viola	Ghozland Law Firm
Knarr, Linda	Ghozland Law Firm
Loyd, Delores	Ghozland Law Firm
Lutz, Michelle	Ghozland Law Firm
McGuire, Fran	Ghozland Law Firm
Muse, Lucinda	Ghozland Law Firm
Negro, Roni	Ghozland Law Firm
Petersen, Angela	Ghozland Law Firm

Rodriguez, Tamara	Ghozland Law Firm
Roose, Lynne	Ghozland Law Firm
Summa, Deborah	Ghozland Law Firm
West, Darlene	Ghozland Law Firm
Leon Martinez, Tricia	Halliday Law
Fleming, Alnekea	Hilliard Martinez Gonzales LLP
Frank, Teresa	Hilliard Martinez Gonzales LLP
Orgeron, Tammy	Hilliard Martinez Gonzales LLP
Sabbia, Nancy L.	Hilliard Martinez Gonzales LLP
Thompson, Joanie	Hilliard Martinez Gonzales LLP
Tuohey, Donna J.	Hilliard Martinez Gonzales LLP
Urquiaga, Erinn D.	Hilliard Martinez Gonzales LLP
White Frank, Leonora	Hilliard Martinez Gonzales LLP
White, Roselyn J.	Hilliard Martinez Gonzales LLP
Hasenstab, Karen	Humphrey Law
Dennis, Rhonda	Justinian & Associates PLLC
Takemoto, Cindy	Justinian & Associates PLLC
Badeaux, Vivian	Lamothe Law Firm
Hulford, Jovelyn	Lamothe Law Firm
Monistere, Shae Lynn	Lamothe Law Firm
Mudd, Judith	Lamothe Law Firm
Seuzeneau, Lori R.	Lamothe Law Firm
Schutt, Brittany	Law Office of J. Patrick Connick
Bassini, Lynn	Law Offices of Arnold N. Kriss
Barient, Amy	Law Offices of John D. Sileo
Andrus, Rachel	Lenze Lawyers
Apodaca, Debra	Lenze Lawyers
Appleby, Melissa	Lenze Lawyers
Blake, Jarella	Lenze Lawyers
Cook, Kacia	Lenze Lawyers
Douglass, Brenda	Lenze Lawyers
Durham, Dawn	Lenze Lawyers
Flores-Martinez, Michelle	Lenze Lawyers
Galjour, Caitlyn	Lenze Lawyers
Good, Sally	Lenze Lawyers
Hall, Shelley	Lenze Lawyers
Hasselbrink, Catrina	Lenze Lawyers
Hull, Dianne	Lenze Lawyers
Ison, Annette	Lenze Lawyers
Istre, Melissa	Lenze Lawyers
Lester, Amy	Lenze Lawyers
Lopo, Andrea	Lenze Lawyers
McGlothlin, Sabrina	Lenze Lawyers
Mckinney, Patricia	Lenze Lawyers
Miller, Amira	Lenze Lawyers
Miller, Farrell	Lenze Lawyers

Nanez, Elizabeth	Lenze Lawyers
Oberski, Leigh Ann	Lenze Lawyers
O'Shea, Melanie	Lenze Lawyers
Radden, Tammy	Lenze Lawyers
Rasmussen, Leanna S.	Lenze Lawyers
Ruddiman, Cathy	Lenze Lawyers
Sells, April	Lenze Lawyers
Sheeran, Cynthia	Lenze Lawyers
Sinclair, Shannon	Lenze Lawyers
Stemen, Paige	Lenze Lawyers
Taraczkozy, Tina	Lenze Lawyers
Taylor, Emily	Lenze Lawyers
Walker, Rachel	Lenze Lawyers
Zayas, Wanda	Lenze Lawyers
Albright, Sheri	Leslie Murray Law
Schilling, Kimberly	Leslie Murray Law
Bixler, Patricia (Bair & Moynihan)	Levin Papantonio Rafferty
Bostic, Stacy (deceased)	Levin Papantonio Rafferty
Owens, Lori (Ewy)	Levin Papantonio Rafferty
Pickard, Dawn	Levin Papantonio Rafferty
Ploeger, Ann R. (Dickman)	Levin Papantonio Rafferty
Smith, Robin (deceased)	Levin Papantonio Rafferty
Anastasia, Elaine	Lipsitz Green Scime Cambria
Amador, Karen	Lopez McHugh
Artemas, Lucile	Lopez McHugh
Atkinson, Amber	Lopez McHugh
Bates, Connie	Lopez McHugh
Belknap, Carol	Lopez McHugh
Berencia, Dahlia	Lopez McHugh
Berry, Cathy	Lopez McHugh
Bilton-Smith, Gretchen	Lopez McHugh
Brehm, Leslie	Lopez McHugh
Carlisle, Jennifer	Lopez McHugh
Cuave, Nova	Lopez McHugh
Dantico, Roberta	Lopez McHugh
Denton, Vicky Ann	Lopez McHugh
Devlugt, Rhea	Lopez McHugh
Dixon, Amy	Lopez McHugh
Dodd, Brandie	Lopez McHugh
Garzella, Wendy	Lopez McHugh
Jameson, Nicol	Lopez McHugh
Jones, Heather	Lopez McHugh
Jones, Tinayia	Lopez McHugh
Klein, Lacey	Lopez McHugh
Konduros, Jill	Lopez McHugh
Lare, Kimberly	Lopez McHugh

Leach, Jessica	Lopez McHugh
Leatherwood, Rebecca	Lopez McHugh
Lyons, Joanna	Lopez McHugh
Manuel, Kathy	Lopez McHugh
Mariano, Diane	Lopez McHugh
McCrea, Elizabeth	Lopez McHugh
Morris, Victoria	Lopez McHugh
Morrow, Geri	Lopez McHugh
Morton, Cynthia	Lopez McHugh
O'Dell, Danielle	Lopez McHugh
Orozco, Sandra	Lopez McHugh
Pekarek, Kayla	Lopez McHugh
Ramirez, Juliana Restrepo	Lopez McHugh
Restrepo, Adyle Assis	Lopez McHugh
Rivera, Maria Cristina	Lopez McHugh
Roberts, Christyne	Lopez McHugh
Rocha, Martha Yesenia	Lopez McHugh
Sables, Linda	Lopez McHugh
Schuller, Donna Michelle	Lopez McHugh
Shugg, Nancy	Lopez McHugh
Zamora, Xheila	Lopez McHugh
Stuebe, Sonia	Marc J. Bern
Bongiorno, Zebonee	Mazie Slater Katz & Freeman LLC
Ha, Hang	Mazie Slater Katz & Freeman LLC
Lucius, Hope	Mazie Slater Katz & Freeman LLC
Rico, Randi	Mazie Slater Katz & Freeman LLC
Rude, Megan	Mazie Slater Katz & Freeman LLC
Larkin, Donna	Mezibov Butler
King, Patricia Jo McMIndes	Montee Law Firm
Kampen, Joy	Murray Law Firm
Aguilar, Carmen	Panish Shea Ravipudi LLP
Baron-Allen, Dawn	Panish Shea Ravipudi LLP
Cain, Julie	Panish Shea Ravipudi LLP
Craft, Jody	Panish Shea Ravipudi LLP
Lara, Laura	Panish Shea Ravipudi LLP
Veeneman, Gina	Panish Shea Ravipudi LLP
Athens, Elizabeth	Panish/Bentley & More
Lewis, Candice	Panish/Bentley & More
Love, Brittany	Panish/Bentley & More
Mumphrey, Courtney	Panish/Bentley & More
Rehbein, Ashlee	Panish/Bentley & More
Warren, Robin	Panish/Bentley & More
Scolaro, Stephanie	Podhurst Orseck, P.A.
Frick, Judith	Robinson Calcagnie
Bullard, Amy	Robinson Calcagnie
Brown, Tiffany	Sangisetty Law Firm

Falgout, Bonnie	Sangisetty Law Firm
Gay, Lauren	Sangisetty Law Firm
Burley, Michelle	Schlesinger Law Offices
Chouest, Ashley	Schlesinger Law Offices
Dill, Ashley	Schlesinger Law Offices
Hernandez, Francheska	Schlesinger Law Offices
Hodge, Joanne	Schlesinger Law Offices
Kinal, Heather	Schlesinger Law Offices
Roundy, Cheri	Schlesinger Law Offices
Wertz, Alicia	Schlesinger Law Offices
Abbott, Miranda	Seeger Weiss LLP
Adams, Shanna	Seeger Weiss LLP
Bennett, Amy Jolene	Seeger Weiss LLP
Bergschneider, Gloria	Seeger Weiss LLP
Bess, Nora	Seeger Weiss LLP
Boudreaux, Heather	Seeger Weiss LLP
Bowen, Kimberly	Seeger Weiss LLP
Boyd, Mary	Seeger Weiss LLP
Cinque, Christina	Seeger Weiss LLP
Coffman, Kim	Seeger Weiss LLP
Courville, Tessie Rachal	Seeger Weiss LLP
Duncan, Janell	Seeger Weiss LLP
Duncan, Traci Wilson	Seeger Weiss LLP
Estrella, Stacie	Seeger Weiss LLP
Froling, Erika	Seeger Weiss LLP
Gallegos, Christine	Seeger Weiss LLP
Gharibian, Violet	Seeger Weiss LLP
Goodman, Elizabeth	Seeger Weiss LLP
Hernandez-Patton, Melissa	Seeger Weiss LLP
Hoang, Cecile	Seeger Weiss LLP
Howard, Tammy	Seeger Weiss LLP
Hudson, Ambur	Seeger Weiss LLP
Kazmier-Mahalik, Victoria	Seeger Weiss LLP
Kidd, Shannel	Seeger Weiss LLP
Koch, Tessa	Seeger Weiss LLP
Krause, Laurie	Seeger Weiss LLP
Lahniers, Shawn	Seeger Weiss LLP
Long, Sara	Seeger Weiss LLP
Loredo, Sandra	Seeger Weiss LLP
Martinez, Carolina	Seeger Weiss LLP
Mayer, Jennifer	Seeger Weiss LLP
McDonald, Denean	Seeger Weiss LLP
Mikhail, Christine	Seeger Weiss LLP
Mora, Veronica	Seeger Weiss LLP
Morrissey, Julie	Seeger Weiss LLP
Muñoz-Lebaron, Elizabeth	Seeger Weiss LLP

Navasartian-Gharibian, Hrik	Seeger Weiss LLP
Núñez, Jennifer	Seeger Weiss LLP
Patton, Courtney	Seeger Weiss LLP
Plish, Marina	Seeger Weiss LLP
Russell, Hannah	Seeger Weiss LLP
Shtaubert, Ashira	Seeger Weiss LLP
Silvester, Jeannie	Seeger Weiss LLP
Skeen, Ryan	Seeger Weiss LLP
Souser, Naji	Seeger Weiss LLP
Tate, Kendra	Seeger Weiss LLP
Vendl, Sherri	Seeger Weiss LLP
Waterston, Brandy	Seeger Weiss LLP
Williams, Bobbi	Seeger Weiss LLP
Williams, Nacole	Seeger Weiss LLP
Zink, Caroline	Seeger Weiss LLP
McGinnis, Mary	Simons Law Office
Harris, Ann	Skinner Law Firm
Garlich, Anne	SWMW Law
McDermott, Bonnie	SWMW Law
Adams, Helen	Taylor Martino, P.C.
Browning, Lori	Taylor Martino, P.C.
Grady, Marsha	Taylor Martino, P.C.
Bishop, Deborah	Thomas Law Office
Puckett, Whitney	Williams Dirks Dameron
Kromminga, Sharie	Wittels McInturff Palikovic
Laliberte, Jacquelyn	Wittels McInturff Palikovic
Proux, Julie	Wittels McInturff Palikovic
Souslin, April	Wittels McInturff Palikovic
Tull, Jacqueline	Wittels McInturff Palikovic

EXHIBIT B

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: ALLERGAN BIOCELL
TEXTURED BREAST IMPLANT
PRODUCT LIABILITY LITIGATION**

Case No. 2:19-md-2921-BRM-LDW

This Document Relates To:

[Insert Case Name]

Civil Action No. _____

PLAINTIFF SHORT FORM FACT SHEET FOR PRODUCT-IN-PLACE CASES

1. Plaintiff's Name: _____
2. Name of Person completing this Form (if different than Plaintiff):

3. Plaintiff's DOB: _____
4. Plaintiff's current address: _____
5. Plaintiff's current occupation and employer: _____
6. Plaintiff's Law Firm Name: _____

1. BREAST IMPLANT USE HISTORY

Please provide the information requested in the chart below regarding Plaintiff's Biocell products that are currently in place, including breast implants and/or tissue expanders. In addition, based upon your best recollection, please identify all other breast implants/tissue expanders that have ever been implanted in the past, whether or not the implants/expanders were manufactured by Allergan.

Implant 1

1.1 Breast Implant(s) and/or Tissue Expander(s) Received

Implantation date:		Name and address of implanting surgeon:	
Manufacturer/Lot/Serial numbers:		Reason for receiving implant(s)/expander(s) (e.g., augmentation, reconstruction):	
If implant(s)/expander(s) were ever removed, date of removal.		Name and address of surgeon who removed implant(s)/expander(s):	

Implant 2

1.2 Breast Implant(s) and/or Tissue Expander(s) Received

Implantation date:		Name and address of implanting surgeon:	
Manufacturer/Lot/Serial numbers:		Reason for receiving implant(s)/expander(s) (e.g., augmentation, reconstruction):	
If implant(s)/expander(s) were ever removed, date of removal.		Name and address of surgeon who removed implant(s)/expander(s):	

Implant 3			
1.3 Breast Implant(s) and/or Tissue Expander(s) Received			
Implantation date:		Name and address of implanting surgeon:	
Manufacturer/Lot/Serial numbers:		Reason for receiving implant(s)/expander(s) (e.g., augmentation, reconstruction):	
If implant(s)/expander(s) were ever removed, date of removal.		Name and address of surgeon who removed implant(s)/expander(s):	

2. CLAIMED INJURIES AND DAMAGES

- 2.1 For each injury, symptom or condition that Plaintiff alleges resulted from use of Biocell device(s) identified above, including, without limitation, any emotional or mental-health related conditions, state:

Injury /symptom alleged	Date <u>first</u> experienced symptoms	Date <u>first</u> received treatment (if any)	Name and address of treating health care provider(s)	Description of treatment provided

- 2.2 If Plaintiff has paid or incurred any medical expenses, including amounts billed or paid by insurers and other third-party payors, which are related to any injury or condition which Plaintiff claims was caused by your use of Biocell device(s) and for which you seek to recover in this case, please state the total amount of such expenses.

- 2.3 If Plaintiff contends that she has been diagnosed with any medical condition(s) which prevents removal of her Biocell device(s), please provide the following information:

Medical condition(s)	Name and address of treating physician(s) who have recommended against removal.	Date of discussion(s)	Summary of discussion and number of times discussed with your physician(s)

2.1 Does Plaintiff contend that she would remove her Biocell device(s) but for financial inability?

☐ Yes ☐ No

3. KNOWLEDGE OF RECALL

3.1 When did Plaintiff learn that Biocell product(s) had been recalled? _____

3.2 How did Plaintiff learn about the recall? _____

3.3 If Plaintiff discussed the recall with any physicians, provide the following information about such communications:

Name of physician or healthcare provider and address	Specialty of physician or healthcare provider	Date of discussion(s)	Summary of discussion and number of times discussed with your physician(s)

4. DOCUMENT DEMANDS

Produce all non-duplicative, and non-privileged, non-work product protected documents, including but not limited to ESI documents, in Plaintiff's or Plaintiff's lawyers' possession, custody, or control, following a reasonable search for documents responsive to the following requests.

- 4.1 Documents sufficient to show that Plaintiff has in-place Biocell device(s), including model, lot and serial numbers.
- ☐ Yes ☐ No
- 4.2 Medical records, pharmacy records, reports, test results, bills, and any other records or documents relating to Plaintiff's use of Biocell device (s) and/or tissue expanders, or Plaintiff's claimed injuries.
- ☐ Yes ☐ No
- 4.3 Documents reflecting discussions between Plaintiff and any treating healthcare providers regarding removal of Plaintiff's Biocell device(s).
- ☐ Yes ☐ No
- 4.4 Documents constituting, concerning, or relating to product use instructions, product warnings, product brochures, or other materials distributed with or provided to Plaintiff in connection with Plaintiff's use of Biocell device(s).
- ☐ Yes ☐ No

DECLARATION

I declare under penalty of perjury, subject to all applicable laws, as follows:

The information provided in this Plaintiff Fact Sheet is true and correct to the best of my knowledge, information and belief, and it was formed after due diligence and reasonable inquiry, except that my statements regarding breast implants/expanders other than the Biocell products currently in place are based upon my best recollection only. The spelling of any names identified in this Plaintiff Fact Sheet are accurate to the best of my knowledge and belief.

I have conducted reasonable searches of documents within my possession, custody, or control, and/or in the possession of my lawyer for information, responsive to the requests in Section 3 of this Plaintiff Fact Sheet. All responsive, non-duplicative, and non-privileged documents have been produced with this Plaintiff Fact Sheet.

I acknowledge that I have an obligation to supplement the above responses if I learn that they are in any material respect incomplete or incorrect.

Plaintiff's Signature

Plaintiff's Printed Name

Date

EXHIBIT C

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

**IN RE: ALLERGAN BIOCELL
TEXTURED BREAST IMPLANT
PRODUCTS LIABILITY LITIGATION**

**MDL NO. 2921
Case No.: 2:19-md-02921**

**JUDGE BRIAN R. MARTINOTTI
JUDGE LEDA DUNN WETTRE**

**SHORT FORM DEFENDANT FACT
SHEET FOR PRODUCT-IN-PLACE
CASES**

Plaintiff: _____
Name of Plaintiff

**Individual Case Docket
No.** _____

PRELIMINARY STATEMENT

The Allergan Defendants have relied on the information contained in the Short Form Plaintiff Fact Sheet (“SF-PFS”) for purposes of responding to this Short Form Defendant Fact Sheet (“SF-DFS”) and have provided information based upon reasonable review of available databases and/or other sources of centralized information likely to contain responsive information. The Allergan Defendants have not endeavored to search for requested information in individual custodial files or email records.

DEFINITIONS

1. “BIOCELL” means any and all textured breast implants or textured breast expanders manufactured by or on behalf of the Allergan Defendants.
2. “PRESCRIBING HEALTHCARE PROVIDER” means providers of healthcare, including, but not necessarily limited to physicians, surgeons, medical specialists, medical or osteopathic physicians, surgeons, general surgeons, plastic surgeons, ENT surgeons or other

specialists or general practitioners, who prescribed and/or implanted BIOCELL products to Plaintiff.

I. CASE INFORMATION

This SF-DFS pertains to the following case:

Case Caption:

Docket No.:

II. CONTACTS WITH PLAINTIFF'S PRESCRIBING HEALTHCARE PROVIDERS

A. As to each PRESCRIBING HEALTHCARE PROVIDER identified by Plaintiff(s) in response to the SF-PFS, set forth the following information:

1. Identify the PRESCRIBING HEALTHCARE PROVIDER.
2. Set forth all contacts between ALLERGAN and the PRESCRIBING HEALTHCARE PROVIDER, with regard to Plaintiff.

III. INFORMATION REGARDING PLAINTIFF

A. Produce all documents in Allergan's possession, custody, or control that identify Plaintiff and/or produce all Med Watch Adverse Event Reports and/or any other documents submitted by ALLERGAN to the FDA or any other government agency with regard to the Plaintiff.

IV. MANUFACTURING/DEVICE INFORMATION

- A. Set forth the lot number(s) for the BIOCELL device(s) implanted into Plaintiff, as identified by Plaintiff in her SF PFS.
- B. Produce the Device History Record (a.k.a. Batch Record) for the lot. [The Batch Record will address both the finished goods and the component pieces and include a report detailing any nonconformities to the product specifications, if any.
- C. For Plaintiff's in-place BIOCELL device(s), produce all complaints, complaint file(s), including, without limitation, medical records, complaint detail, MedWatch form, MedWatch form supplements, and retrieval analysis report, if any, for Plaintiff, or identify the corresponding Bates number if the complaint file has already been produced.

ALLERGAN CERTIFICATION

I am authorized to sign this Certification to the Allergan Defendants' Responses to this Short Form Defendant Fact Sheet and state that the matters inquired above are not necessarily within my personal knowledge; that the facts stated therein have been assembled by authorized employees and/or counsel for the Allergan Defendants and I am informed that the facts stated therein are true. I declare under penalty of perjury that the foregoing is true to the best of my knowledge, information and belief at the present time.

Name:

Title: