

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

<b>In re: Valsartan, Losartan, and Irbesartan Products Liability Litigation</b>	MDL No. 2875
This document relates to:	Honorable Robert B. Kugler, District Court Judge
Case No:                -CV-	
Plaintiff 1:	Honorable Joel Schneider, Magistrate Judge
Plaintiff 2:	
Plaintiff 3:	
Plaintiff 4:	

**SHORT FORM COMPLAINT**

Plaintiff(s) file(s) this *Short Form Complaint and Demand for Jury Trial* against Defendants named below by and through the undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations contained in Plaintiffs' Master Personal Injury Complaints for Valsartan (ECF No. 122), Losartan (ECF No. 682), and Irbesartan (ECF No. 683), MDL 2875 in the United States District Court for the District of New Jersey, Camden Vicinage. Plaintiff(s) file this Short Form Complaint as permitted by Case Management Order Nos. 3, 9, 13, 13B, and 19 of this Court.

In addition to those causes of action contained in Plaintiffs' Master Long Form Complaints as referenced above, where certain claims require specific pleadings and/or amendments, Plaintiff(s) shall add and include them herein.

**IDENTIFICATION OF PARTIES**

**I. IDENTIFICATION OF PLAINTIFF(S)**

1. **Name of individual who alleges injury due to use of a valsartan, losartan, and/or irbesartan-containing drug:**

Plaintiff 1:

Plaintiff 2:

Plaintiff 3:

Plaintiff 4:

2. This claim is being brought on behalf of

Myself

Someone else

a. If I checked, "someone else", this claim is being brought on behalf of:

\_\_\_\_\_

b. My relationship to the person in 2(a) is:

3. **Consortium Claim(s): The following individual(s) allege damages for loss of consortium:**

4. **County and state of residence of Plaintiff or place of death of Decedent:**

County: \_\_\_\_\_

State: \_\_\_\_\_

5. **If a survival and/or wrongful death claim is asserted:**

a. **Name of the individual(s) bringing the claims on behalf of the decedent's estate, and status (i.e., personal representative, administrator, next of kin, successor in interest, etc.):**

Name of the Individual(s)	Status

**II. IDENTIFICATION OF DEFENDANTS**

- 1. Plaintiff brings these claims as a result of developing injuries as a result of taking the following medications:**

	<b>Medication(s) Taken (Check all that apply)</b>
	Valsartan-Containing Drugs (VCDs)
	Losartan-Contain Drugs (LCDs)
	Irbesartan-Containing Drugs (ICDs)

- 2. Plaintiff(s) bring claims against the following Defendants related to his or her ingestion of Valsartan:**

*(\*Defendants with asterisks next to their names have been dismissed pursuant to a dismissal and tolling stipulation entered by the Parties. By checking the box next to any asterisked Defendant(s), Plaintiff thereby represents that he or she would have brought an action against said Defendant(s) but for the dismissal and tolling stipulation.)*

***i. API Manufacturers***

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>API Manufacturer</b>	Aurobindo Pharma, Ltd.	Foreign
	<b>API Manufacturer Parent Corporation</b>	Hetero Drugs, Ltd.	Foreign
	<b>API Manufacturer</b>	Hetero Labs, Ltd.	Foreign
	<b>API Manufacturer</b>	Mylan Laboratories Ltd.	Foreign
	<b>API Manufacturer Parent Corporation</b>	Mylan N.V.	Foreign
	<b>API Manufacturer</b>	Zhejiang Huahai Pharmaceutical Co., Ltd.	Foreign
	<b>API Manufacturer</b>	John Doe	N/A

*ii. Finished Dose Manufacturers*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Finished Dose Manufacturer</b>	Arrow Pharm (Malta) Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Aurolife Pharma, LLC	NJ
	<b>Finished Dose Manufacturer</b>	Hetero Labs, Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Mylan Pharmaceuticals Inc.	WV
	<b>Finished Dose Manufacturer</b>	Teva Pharmaceutical Industries, Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Torrent Pharmaceuticals, Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Zhejiang Huahai Pharmaceutical Co., Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	John Doe	N/A

*iii. Repackagers, Labelers, and Distributors*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Labeler/ Distributor</b>	Aceteris, LLC	NJ
	<b>Finished Dose Distributor</b>	Actavis, LLC	NJ
	<b>Finished Dose Distributor</b>	Actavis Pharma, Inc.	NJ
	<b>Repackager</b>	A-S Medication Solutions, LLC*	NE
	<b>Finished Product Distributor</b>	Aurobindo Pharma USA, Inc.	NJ
	<b>Repackager</b>	AvKARE, Inc.	TN
	<b>Repackager</b>	Bryant Ranch Prepack, Inc.*	PA
	<b>Labeler/Distributor</b>	Camber Pharmaceuticals, Inc.	NJ
	<b>Parent Company for The Harvard Drug Group, L.L.C. d/b/a Major Pharmaceuticals</b>	Cardinal Health, Inc.*	OH

	<b>Repackager</b>	The Harvard Drug Group, LLC d/b/a Major Pharmaceuticals*	MI
	<b>Repackager</b>	H J Harkins Co., Inc.	CA
	<b>API Distributor</b>	Huahai U.S. Inc.	NJ
	<b>Repackager</b>	Northwind Pharmaceuticals*	IN
	<b>Repackager</b>	NuCare Pharmaceuticals, Inc.*	CA
	<b>Repackager</b>	Preferred Pharmaceuticals, Inc.	CA
	<b>Repackager</b>	RemedyRepack, Inc.	PA
	<b>Finished Dose Distributor</b>	Solco Healthcare U.S., LLC	NJ
	<b>Finished Dose Distributor</b>	Teva Pharmaceuticals USA, Inc.	PA
	<b>Finished Dose Distributor</b>	Torrent Pharma, Inc.	NJ
	<b>Labeler/Distributor/Repackager</b>	John Doe	N/A

*iv. Wholesaler Defendants*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Wholesaler</b>	AmerisourceBergen Corporation	PA
	<b>Wholesaler</b>	Cardinal Health, Inc.	OH
	<b>Wholesaler</b>	McKesson Corporation	TX
	<b>Wholesaler</b>	John Doe	N/A

*v. Pharmacies*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Pharmacy</b>	Albertsons Companies, LLC	ID
	<b>Pharmacy</b>	CVS Pharmacy, Inc.	RI
	<b>Pharmacy</b>	Express Scripts, Inc.	MO
	<b>Pharmacy</b>	Humana Pharmacy, Inc.	KY
	<b>Pharmacy</b>	OptumRx	CA
	<b>Pharmacy</b>	Rite Aid Corp.	PA
	<b>Pharmacy</b>	Walgreens Boots Alliance	IL
	<b>Pharmacy</b>	Wal-Mart, Inc.	AR
	<b>Pharmacy</b>	John Doe	N/A

*vi. FDA Liaisons*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>FDA Liaison</b>	Hetero USA, Inc.	NJ
	<b>FDA Liaison</b>	Princeton Pharmaceutical Inc.	NJ
	<b>FDA Liaison</b>	John Doe	N/A

**3. Plaintiff(s) bring claims against the following Defendants related to his or her ingestion of Losartan.**

*(\*Defendants with asterisks next to their names have been dismissed pursuant to a dismissal and tolling stipulation entered by the Parties. By checking the box next to any asterisked Defendant(s), Plaintiff thereby represents that he or she would have brought an action against said Defendant(s) but for the dismissal and tolling stipulation.)*

*i. API Manufacturers*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>API Manufacturer Parent Corporation</b>	Hetero Drugs, Ltd.	Foreign
	<b>API Manufacturer</b>	Hetero Labs, Ltd.	Foreign
	<b>API Manufacturer</b>	Zhejiang Huahai Pharmaceutical Co., Ltd.	Foreign
	<b>API Manufacturer</b>	John Doe	N/A

*ii. Finished Dose Manufacturers*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Finished Dose Manufacturer</b>	Hetero Labs, Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Macleods Pharmaceuticals, Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Macleods Pharma USA, Inc.	NJ
	<b>Finished Dose Manufacturer</b>	Sandoz, Inc.	NJ
	<b>Finished Dose Manufacturer</b>	Teva Pharmaceutical Industries, Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Torrent Pharmaceuticals, Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Vivimed Life Sciences Pvt. Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	Zhejiang Huahai Pharmaceutical Co., Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	John Doe	N/A

*iii. Repackagers, Labelers, and Distributors*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Finished Dose Distributor</b>	Actavis, LLC	NJ
	<b>Finished Dose Distributor</b>	Actavis Pharma, Inc.	NJ
	<b>Repackager</b>	AvKARE, Inc.	TN
	<b>Labeler/Distributor</b>	Camber Pharmaceuticals, Inc.	NJ
	<b>Parent Company for The Harvard Drug Group, L.L.C. d/b/a Major Pharmaceuticals</b>	Cardinal Health, Inc.*	OH
	<b>Repackager</b>	Golden State Medical Supply, Inc. (GSMS)	CA
	<b>Repackager</b>	The Harvard Drug Group, LLC d/b/a Major Pharmaceuticals	MI
	<b>Repackager</b>	Heritage Pharmaceuticals, Inc. d/b/a Avet Pharmaceuticals	NJ
	<b>Repackager</b>	H J Harkins Co., Inc. d/b/a PharmaPac	CA
	<b>API Distributor</b>	Huahai U.S. Inc.	NJ
	<b>Repackager</b>	Legacy Pharmaceutical Packaging, LLC	MO
	<b>Repackager</b>	Major Pharmaceuticals	MI
	<b>Repackager</b>	Preferred Pharmaceuticals, Inc.	CA
	<b>Repackager</b>	RemedyRepack, Inc.	PA
	<b>Finished Dose Distributor</b>	Solco Healthcare U.S., LLC	NJ
	<b>Finished Dose Distributor</b>	Teva Pharmaceuticals USA, Inc.	PA
	<b>Finished Dose Distributor</b>	Torrent Pharma, Inc.	NJ
	<b>Labeler/Distributor/Repackager</b>	John Doe	N/A

*iv. Wholesaler Defendants*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	Wholesaler	AmerisourceBergen Corporation	PA
	Wholesaler	Cardinal Health, Inc.	OH
	Wholesaler	McKesson Corporation	TX
	Wholesaler	John Doe	N/A

*v. Pharmacies*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	Pharmacy	Albertsons Companies, LLC	ID
	Pharmacy	CVS Pharmacy, Inc.	RI
	Pharmacy	Express Scripts, Inc.	MO
	Pharmacy	Humana Pharmacy, Inc.	KY
	Pharmacy	OptumRx	CA
	Pharmacy	Rite Aid Corp.	PA
	Pharmacy	Walgreens Boots Alliance	IL
	Pharmacy	Wal-Mart, Inc.	AR
	Pharmacy	John Doe	N/A

*vi. FDA Liaisons*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	FDA Liaison	Hetero USA, Inc.	NJ
	FDA Liaison	Princeton Pharmaceutical Inc.	NJ
	FDA Liaison	John Doe	N/A

**4. Plaintiff(s) bring claims against the following Defendants related to his or her ingestion of Irbesartan.**

*(\*Defendants with asterisks next to their names have been dismissed pursuant to a dismissal and tolling stipulation entered by the Parties. By checking the box next to any asterisked Defendant(s), Plaintiff thereby represents that he or she would have brought an action against said Defendant(s) but for the dismissal and tolling stipulation.)*



*i. API Manufacturers*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>API Manufacturer</b>	Aurobindo Pharma, Ltd.	Foreign
	<b>API Manufacturer</b>	Zhejiang Huahai Pharmaceutical Co., Ltd.	Foreign
	<b>API Manufacturer</b>	John Doe	N/A

*ii. Finished Dose Manufacturers*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Finished Dose Manufacturer</b>	Aurolife Pharma, LLC	NJ
	<b>Finished Dose Manufacturer</b>	ScieGen Pharmaceuticals, Inc., U.S.	NY
	<b>Finished Dose Manufacturer</b>	Zhejiang Huahai Pharmaceutical Co., Ltd.	Foreign
	<b>Finished Dose Manufacturer</b>	John Doe	N/A

*iii. Repackagers, Labelers, and Distributors*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Repackager</b>	Golden State Medical Supply, Inc. (GSMS)	CA
	<b>Finished Dose Distributor</b>	Westminster Pharmaceuticals	TN
	<b>Labeler/Distributor/Repackager</b>	John Doe	N/A

*iv. Wholesaler Defendants*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	<b>Wholesaler</b>	AmerisourceBergen Corporation	PA
	<b>Wholesaler</b>	Cardinal Health, Inc.	OH
	<b>Wholesaler</b>	McKesson Corporation	TX
	<b>Wholesaler</b>	John Doe	N/A

v. *Pharmacies*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	Pharmacy	Albertsons Companies, LLC	ID
	Pharmacy	CVS Pharmacy, Inc.	RI
	Pharmacy	Express Scripts, Inc.	MO
	Pharmacy	Humana Pharmacy, Inc.	KY
	Pharmacy	OptumRx	CA
	Pharmacy	Rite Aid Corp.	PA
	Pharmacy	Walgreens Boots Alliance	IL
	Pharmacy	Wal-Mart, Inc.	AR
	Pharmacy	John Doe	N/A

vi. *FDA Liaisons*

	<b>Defendant Role</b>	<b>Defendant Name</b>	<b>HQ States</b>
	FDA Liaison	Prinston Pharmaceutical Inc.	NJ
	FDA Liaison	John Doe	N/A

III. JURISDICTION AND VENUE

7. Jurisdiction is based on:

Diversity of Citizenship

Other as set forth below:

8. Venue: District and Division in which remand and trial is proper and where you might have otherwise filed this Short Form Complaint, absent the Direct Filing Order entered by this Court: \_\_\_\_\_ District of \_\_\_\_\_

IV. PLAINTIFF'S INJURIES

9. Injuries: Plaintiff was diagnosed with the following type of cancer:

	Liver		Kidney
	Stomach		Colorectal
	Pancreatic		Esophageal
	Small Intestine		Other:



13. **Express Warranty Count: Plaintiff adopts, incorporates, and relies upon the allegations made in the Master Complaint. Any additional Plaintiff-specific allegations as to the Express Warranty Count must be set forth here:**

14. **Plaintiff(s) further bring claims against the following additional Defendants who are not listed above, and such claims are based upon the following grounds:**

Defendant	Grounds

<b>Defendant</b>	<b>Grounds</b>

**WHEREFORE**, Plaintiff(s) pray(s) for relief and demand(s) a trial by jury as set forth in the Plaintiffs' Master Long Form Complaint in MDL 2875 in the United States District Court for the District of New Jersey.

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Date

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/s/

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Attorney Name

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Attorney Firm

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Attorney Address Line 1

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Attorney Address Line 2

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Telephone

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Fax

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Email

*Counsel for Plaintiffs*