

**[PLAINTIFF'S COUNSEL INFORMATION]
ATTORNEYS FOR PLAINTIFFS**

**IN THE SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, ATLANTIC COUNTY**

Plaintiff,	:	
	:	
v.	:	ACCUTANE LITIGATION
	:	
	:	Case Code Number: 271
	:	
HOFFMANN-LA ROCHE INC.;	:	AMENDED ABBREVIATED SHORT
ROCHE LABORATORIES INC.;	:	FORM COMPLAINT FOR
HOFFMANN-LA ROCHE LTD.; and	:	ACCUTANE LITIGATION
ROCHE HOLDING LTD.,	:	
	:	JURY TRIAL DEMANDED
Defendants.	:	

**AMENDED ABBREVIATED INDIVIDUAL COMPLAINT FOR ACCUTANE
LITIGATION AND ADOPTION BY REFERENCE**

1. Plaintiff for his/her claim against the Defendants states and alleges as follows and incorporates by reference the relevant portions of the Master Complaint and/or First Amended Master Complaint on file entitled: In Re: Accutane Litigation Case Code Number 271, now pending in the Superior Court of New Jersey, Law Division, Atlantic County before the Honorable Carol E. Higbee, P.J.Cv..

Plaintiff selects and indicates by checking off the appropriate boxes, those claims that are specific to his or her case. Where claims require, pursuant to New Jersey law, specific pleading or case specific facts and individual information, plaintiff shall add and include them herein.

2. Plaintiff, _____ (hereinafter referred to as "Plaintiff"), is an individual who resides at _____ in the State of _____.

2A. Plaintiff suffered the following injury(ies) as a result of ingesting Accutane/Roaccutane/Isotretinoin (specify which one) : _____.

2B. Plaintiff brings this action:
_____ on behalf of himself or herself
_____ as the representative of _____.
_____ as the parent and natural guardian ad litem of _____,
a minor born on _____.
_____ as Administrator of the Estate of Plaintiff's _____
(hereinafter "Decedent", see Letters of Administration annexed hereto as Exhibit A), who died on _____.

2C. Plaintiff claims damages as a result of:
_____ Personal Injury to himself, herself or the person represented
_____ Wrongful Death
_____ Survival Action
_____ Loss of Consortium (per quod)
_____ Loss of Services
_____ Economic Loss

3. Plaintiff/Decedent purchased and/or otherwise obtained Accutane/Roaccutane/Isotretinoin (specify which one), which Plaintiff/Decedent ingested from _____ to _____.

4. Plaintiff's spouse, _____, (hereinafter referred to as "Spouse") is an adult individual residing at _____ in the State of _____ and claims damages as a result of:

_____ Loss of Consortium

_____ Wrongful Death, date of death _____.

5. The following claims asserted in the Master Complaint and/or First Amended Master Complaint against The Roche Group and the allegations with regard thereto in the Master Complaint and/or First Amended Master Complaint are herein adopted by reference:

_____ Count I: Product Liability – Defective Design (New Jersey Products Liability Act – N.J.S.A. 2A:58C-1 et seq. and/or the analogous law of plaintiff's state(s) of ingestion and/or prescription)

_____ Count II: Product Liability- Failure to Warn (New Jersey Products Liability Act - N.J.S.A. 2A:58C-1 et seq. and/or the analogous law of plaintiff's state(s) of ingestion and/or prescription)

_____ Count III: NJ Consumer Fraud Act (N.J.S.A. 56:8-1 et. seq. and/or the analogous law of plaintiff's state(s) of ingestion and/or prescription)

_____ Count IV: Breach of Express Warranty

_____ Count V: Punitive Damages Under Common Law & Products Liability Act (N.J.S.A. 2A:C-1 and/or the analogous law of plaintiff's state(s) of ingestion and/or prescription)

_____ Count VI: Wrongful Death

_____ Count VII: Survival Action (N.J.S.A. 2A:15-3 et seq. and/or the analogous law of plaintiff's state(s) of ingestion and/or prescription)

_____ Count VIII: Loss of Consortium/Per Quod

_____ Count IX: Negligence against the Roche Group as to Brand Name Accutane

_____ Count X: Negligence against the Roche Group with regard to Generic Isotretinoin Products

_____ Count XI: Negligent Misrepresentation against the Roche Group with regard to Generic Isotretinoin Products

_____ Count XII: Component Part Strict Product Liability – Failure to Warn against the Roche Group with regard to Generic Isotretinoin Products

6. Plaintiff asserts the following additional facts and theories of recovery against Defendants: _____.

* If you include additional claims against entity(ies) other than the named Defendants, the facts supporting this count must be specifically pled by the plaintiff and the defendants against who they are alleged must be identified on a separate sheet of paper attached to the Complaint.

* If you have included any additional theories of recovery, to the extent they require specificity in pleadings, the specific facts and allegations supporting these theories must be pleaded by the plaintiff in a manner complying with the requirements of the New Jersey Rules of Court.

DEMAND FOR JURY TRIAL

Demand is hereby made for a trial by jury.

Plaintiff's Counsel

Dated:

CERTIFICATION PURSUANT TO RULE 4:5-1

Plaintiff upon information and belief is not aware of any pending or contemplated action. Further, upon information and belief, she/he is not aware of any other party who should be joined in this action.

Plaintiff's counsel

Dated:

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, _____, is hereby designated as trial counsel in this matter.

Plaintiff's Counsel

Dated: