

**BEFORE THE UNITED STATES JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

IN RE: TAXOTERE (DOCETAXEL)
PRODUCTS LIABILITY LITIGATION)
_____)

MDL DOCKET NO. _____

**MOTION OF PLAINTIFFS, VERONICA SMITH AND
KELLY GAHAN, FOR TRANSFER OF ACTIONS
PURSUANT TO 28 U.S.C. SECTION 1407 TO THE EASTERN
DISTRICT OF LOUISIANA FOR CENTRALIZED PRETRIAL PROCEEDINGS**

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Pursuant to 28 U.S.C. § 1407 and Judicial Panel on Multidistrict Litigation Rule 6.2, Plaintiffs, Veronica Smith and Kelly Gahan (“Movants”), respectfully request an order transferring thirty-three (33) pending Taxotere® product liability actions, as well as all future Taxotere® cases, to the Eastern District of Louisiana for centralized pretrial proceedings.

As explained more fully in the accompanying memorandum, a § 1407 transfer of these actions to the Eastern District of Louisiana is appropriate for the following reasons:

1. The actions identified in the accompanying Schedule of Actions (the “Taxotere® actions”) involve product liability suits alleging, *inter alia*, that defendants, Sanofi S.A., Aventis Pharma S.A. and Sanofi-Aventis U.S. LLC (“Sanofi”), manufactured, marketed, distributed, supplied, promoted and/or sold Taxotere®, which is defective and unreasonably dangerous in that it causes permanent hair loss (alopecia); that Sanofi knew or should have known of the risk of alopecia associated with Taxotere® usage; that Sanofi marketed, distributed and/or sold Taxotere® without adequate warnings concerning its risks; and that as a direct and proximate result of using Taxotere®, women across the nation have suffered serious injuries, physical and mental pain and suffering, as well as economic loss.

2. Thirty-three (33) Taxotere® actions are pending in sixteen (16) different federal judicial districts before thirty (30) different judges, including five (5) cases in the United States District Court for the Eastern District of Louisiana.

3. Centralization will eliminate duplicative discovery, prevent inconsistent pretrial rulings, and promote judicial efficiency. In particular, centralization will allow the parties to coordinate document discovery and to coordinate a single set of depositions of key witnesses.

4. Movants request that these cases be centralized in the Eastern District of Louisiana.

WHEREFORE, Plaintiffs respectfully ask the Panel to issue an Order transferring all the actions listed in the accompanying Schedule of Actions, as well as all subsequently filed related actions, to the United States District Court for the Eastern District of Louisiana for coordinated or consolidated pretrial proceedings.

Date: July 22, 2016

Respectfully Submitted,

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