

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: HAIR RELAXER MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION	MDL No. 3060 Master Docket Case No. 1:23-cv-00818 Honorable Mary M. Rowland
Carrie Young v. L'Oréal USA, Inc., L'Oréal USA Products, Inc. SoftSheen-Carson LLC,	SHORT-FORM COMPLAINT AND JURY DEMAND Civil Action No. 1:24-cv-529

1. Plaintiff (hereinafter, "Plaintiff") incorporates by reference Plaintiffs' Master Long Form Complaint in *In Re: Hair Relaxer Marketing, Sales Practices and Products Liability Litigation*, MDL 3060, filed as of January 19, 2024, as Document Number 106.

2. Plaintiff, Carrie Young, files this Complaint pursuant to CMO No. 2 and is to be bound by the rights, protections and privileges, and obligations of that CMO and other Orders of the Court. Further, in accordance with CMO No. 2, Plaintiff hereby designates the United States District Court for the Southern District of Mississippi Plaintiff's designated venue ("Original Venue"). Plaintiff makes this selection based upon one (or more) of the following factors (please check the appropriate box(es)):

☐ Plaintiff currently resides in Canton, MS (City/State);

☒ Plaintiff purchased and used Defendant(s)' products in MS;

☐ The Original Venue is a judicial district in which Defendant _____ resides, and all defendants are residents of the State in which the district is located (28 U.S.C. § 1391(b)(1)).

☒ The Original Venue is a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred, specifically (28 U.S.C. § 1391(b)(2)): _____.

____ There is no district in which an action may otherwise be brought under 28 U.S.C. § 1391, and the Original Venue is a judicial district in which Defendant _____ is subject to the Court's personal jurisdiction with respect to this action (28 U.S.C. § 1391(b)(3)).

____ Other reason (please explain): _____.

3. For purposes of diversity jurisdiction, Plaintiff is a citizen of MS.

4. Plaintiff is suing the following Defendants, and for purposes of diversity, whose

State of Incorporation/Formation and Principal Place of Business is as follows:

Check All Applicable Defendants	Defendant	State of Incorporation or Formation	Principal Place of Business
☐	AFAM Concept, Inc. d/b/a JF Labs, Inc.	Illinois	Illinois
☐	Avlon Industries	Illinois	Illinois
☐	Beauty Bell Enterprises LLC f/k/a House of Cheatham, Inc.	Georgia	Georgia
☐	Dabur International Ltd.	Isle of Man	Dubai
☐	Dabur International USA Ltd.	India	Illinois
☐	Dermoviva Skin Essentials, Inc.	Delaware	New Jersey
☐	Godrej SON Holdings, Inc.	Georgia	Georgia
☐	House of Cheatham LLC	Delaware	Georgia
☒	L'Oréal USA, Inc.	Delaware	New York
☒	L'Oréal USA Products, Inc.	Delaware	New York
☐	Luster Products, Inc.	Illinois	Illinois
☐	McBride Research Laboratories, Inc.	Georgia	Georgia
☐	Namaste Laboratories LLC	Illinois	Illinois
☐	Revlon Consumer Products Corporation	Delaware	New York
☐	Revlon Group Holdings LLC	Delaware	Delaware
☐	Revlon, Inc.	Delaware	New York

Check All Applicable Defendants	Defendant	State of Incorporation or Formation	Principal Place of Business
☒	SoftSheen-Carson LLC	New York	New York
☐	Strength of Nature, LLC	Georgia	Georgia
☐	Other (Please identify): _____	_____	_____
☐	Other (Please identify): _____	_____	_____
☐	Other (Please identify): _____	_____	_____

**CASE SPECIFIC FACTS REGARDING
HAIR RELAXER PRODUCT USE AND INJURIES**

5. Upon information and belief, Plaintiff began using hair relaxer product(s) on or about the following date, 1970, and if applicable, stopped using hair relaxer product(s) on or about the following date: 2016.

6. Upon information and belief, Plaintiff used the following hair relaxer product(s), which Plaintiff contends caused and/or contributed to her Uterine Cancer and brings claims against the following Defendants:

Defendant	Product List (Select All Applicable Products)
<u>AFAM Concept, Inc.</u> <u>d/b/a JF Labs, Inc.</u>	☐ Hawaiian Silky - Crème Conditioning No Lye Silky Smooth Sheen Relaxer ☐ Hawaiian Silky - Herbal No Lye Conditioning Relaxer System with Tea Tree & Avocado Oil - 2 Applications ☐ Vitale - Olive Oil Anti-Breakage Relaxer No Base with Shea Butter - Regular Strength ☐ Vitale Pro - New Texture Salon Exclusive Hair Relaxer ☐ Vitale Mo'Body - Shea Butter Sensitive Scalp Relaxer with Oatmeal Protein ☐ Vitale - Life and Body - Hair Relaxer with Aloe Vera - Smooth Silky Texture ☐ Other (please specify): _____

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>
<u>Avlon Industries, Inc.</u>	☐ Affirm Crème Relaxer ☐ Affirm Sensitive Scalp Relaxer ☐ Affirm Dry & Itchy Scalp Relaxer ☐ Affirm FiberGuard Conditioning Crème Relaxer ☐ Affirm FiberGuard Sensitive Scalp Conditioning Relaxer ☐ Other (please specify): _____
<u>Beauty Bell Enterprises, LLC f/k/a House of Cheatham, Inc.</u>	☐ Africa's Best Herbal Intensive No-Lye Relaxer System ☐ Originals by Africa's Best Originals Olive Oil Conditioning Relaxer ☐ Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil ☐ Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System ☐ Organics by Africa's Best Kids Organic Conditioning Relaxer System ☐ Organics by Africa's Best Kids Natural Conditioning Relaxer System ☐ Texture My Way Men's Texturizing Kit ☐ Texture My Way Women's Texturizing & Softening System ☐ Other (please specify): _____
<u>House of Cheatham, LLC</u>	☐ Africa's Best Herbal Intensive No-Lye Relaxer System ☐ Originals by Africa's Best Originals Olive Oil Conditioning Relaxer ☐ Organics by Africa's Best Olive Oil Conditioning Relaxer System with Extra Virgin Olive Oil ☐ Originals by Africa's Best Kids Originals Natural Conditioning Relaxer System ☐ Organics by Africa's Best Kids Organic Conditioning Relaxer System ☐ Organics by Africa's Best Kids Natural Conditioning Relaxer System ☐ Texture My Way Men's Texturizing Kit ☐ Texture My Way Women's Texturizing & Softening System ☐ Other (please specify): _____
<u>L'Oréal USA, Inc./ L'Oréal USA Products, Inc./ SoftSheen-Carson LLC</u>	☐ Dark and Lovely Beautiful Beginnings No-Mistake Smooth Relaxer ☐ Dark and Lovely Beautiful Beginnings No Mistake Curl Softener ☐ Dark and Lovely Healthy Gloss 5 Shea Moisture No Lye Relaxer ☐ Dark and Lovely Triple Nourished Silkening Relaxer ☐ Optimum Salon Haircare Defy Breakage No-Lye Relaxer ☐ Optimum Salon Haircare Amla Legend Relaxer ☐ Optimum Care Bodifying Relaxer ☐ Optimum Multi-Mineral Reduced pH Crème Relaxer ☐ Bantu No Base Relaxer

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>
	☐ Ultra Precise No-Lye Conditioning Relaxer ☐ Mizani Butter Blend Relaxer ☐ Mizani Butter Blend Sensitive Scalp Rhelaxer ☐ Mizani Butterblend Prosolvent Relaxer ☐ Mizani Classic Rhelaxer ☐ Mizani Sensitive Scalp Rhelaxer ☐ Care Free Curl – Cold Wave Chemical Rearranger Super Strength ☐ Look of Radiance Permanent Crème Relaxer Kit ☐ Other (please specify): _____
<u>Luster Products Company</u>	☐ Luster’s Pink Oil Moisturizer No-Lye Conditioning Relaxer ☐ Luster’s Pink Oil Moisturizer Short Looks Texturizer ☐ Luster’s Pink Oil Moisturizer Smooth Touch Relaxer ☐ PCJ Kit ☐ PCJ No Lye Kit - Adult ☐ PCJ No Lye Kit - Children’s ☐ ShortLooks Colorlaxer Diamond Black ☐ ShortLooks Colorlaxer Passion Red ☐ ShortLooks Colorlaxer Sable Brown ☐ Other (please specify): _____
<u>McBride Research Laboratories</u>	☐ Design Essentials Honey Nectar Relaxer Kit - Time Release Regular Strength ☐ Design Essentials Sensitive Scalp Relaxer System ☐ Design Essentials Regular Conditioning Relaxer ☐ Other (please specify): _____
<u>Namaste Laboratories</u>	☐ ORS Olive Oil Built-In-Protection No-Lye Relaxer – Full Application ☐ ORS Olive Oil No-Mix Salon Formula Crème Relaxer ☐ ORS Olive Oil Ultra Nourish Crème Hair Relaxer ☐ ORS Olive Oil Built-In-Protection No-Lye Relaxer – New Growth ☐ ORS Olive Oil Zone Relaxer – Targeted Touch-Up No-Lye Hair Relaxer ☐ ORS Olive Oil Curl Stretching Texturizer ☐ ORS Olive Oil Crème on Crème Touch-Up No-Lye Hair Relaxer ☐ ORS Olive Oil Mild Touch Relaxer with 60% Lower Chemical ☐ ORS Olive Oil Texlax and Stretch Semi-Straightening System ☐ ORS Olive Oil Girls Built-In Protection Plus No-Lye Conditioning Hair Relaxer System ☐ ORS Olive Oil Girls Soft Curls No-Lye Crème Texture Softening System ☐ ORS HAIRepair No-Lye Conditioning Relaxer System with Cuticle Shield

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>
	☐ ORS Olive Oil Professional No-Lye Relaxer Kit ☐ ORS Olive Oil Professional Crème Relaxer ☐ Namasté Salon System Triple Emulsion Relaxer ☐ Namasté Salon System Crème Relaxer ☐ Namasté Salon System Conditioning Sensitive Scalp No-Lye Relaxer ☐ Namasté Salon System Crème Relaxer Salon Trial Pack ☐ (Other (please specify): _____)
<u>Revlon, Inc./ Revlon Consumer Products Corporation/ Revlon Group Holdings LLC/ Revlon</u>	☐ African Pride – No Lye Relaxer Kit ☐ African Pride – No Base Relaxer ☐ African Pride – Multi Length Texturizer Kit ☐ African Pride – Dream Kids No Lye Relaxer Kit ☐ All Ways Natural – No Lye Conditioning Crème Relaxer Kit ☐ Aroschi Aromaphoric Relaxer System ☐ Crème Of Nature Relaxer Cream ☐ Crème Of Nature Relaxer Kit Argan Oil ☐ Crème of Nature Herbarich Conditioning Crème Relaxer System Kit ☐ Crème of Nature Herbarich Conditioning Crème Relaxer and Texturizing System ☐ Crème of Nature Herbarich No Base Relaxer ☐ Crème of Nature No Base Relaxer ☐ Crème of Nature No Lye Relaxer ☐ Crème of Nature Sodium Relaxer Kit ☐ Crème Of Nature Cni No Lye Relaxer ☐ Crème Of Nature Cni Sunflower & Coconut Oil - Creme ☐ Crème Of Nature Eden Relaxer ☐ Fabulaxer No-Lye Relaxer ☐ Fabulaxer Gro-7 ☐ Revlon Realistic No-Base Relaxer ☐ Revlon Realistic No Lye Relaxer Kit ☐ Other (please specify): _____
<u>Strength of Nature, LLC</u>	☐ African Pride Olive Miracle Deep Conditioning Crème-on-Crème No Lye Relaxer 8 Salon Pack Touch-Ups ☐ African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer ☐ African Pride Olive Miracle Deep Conditioning Curls & Coils Texturizer With Aloe Deep Conditioner ☐ African Pride Olive Miracle Deep Conditioning No-Lye Relaxer One Complete Application ☐ African Pride Olive Miracle Deep Conditioning No-Lye Relaxer, One Complete Touch-Up

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>
	☐ African Pride Shea Miracle Texture Softening Elongating System ☐ African Pride Dream Kids Olive Miracle (4) Touch-Up Relaxer Kit ☐ African Pride Dream Kids Olive Miracle Relaxer ☐ African Pride Dream Kids Olive Miracle Touch-Up Relaxer Kit ☐ Dr. Miracle's No Lye Relaxer Kit ☐ Dr. Miracle's New Growth No-Lye Relaxer Kit ☐ Elasta QP Normal Relaxer Kit ☐ Elasta QP Normal Relaxer Kit 2 Applications ☐ Elasta QP Resistant Relaxer Kit ☐ Elasta QP Sensitive Scalp Kit 12 Application Economy Pack ☐ Elasta QP Sensitive Scalp Kit – 4 Applications ☐ Elasta QP No Base Crème Relaxer ☐ Elasta QP SOY OYL No-Base Relaxer ☐ Elasta QP SOY OYL 4 Application Anti-Dryness No Lye Relaxer Kit ☐ Elasta QP No-Base Relaxer ☐ Elasta QP Extra Body No-Base Regular Relaxer ☐ Elasta QP Extra Body No-Base Super Relaxer ☐ Gentle Treatment No-Lye Relaxer Gray Kit ☐ Gentle Treatment No-Lye Relaxer ☐ Just For Me Relaxer 1 Complete Touch Up Relaxer ☐ Just For Me 4 Application Salon Pack Relaxer ☐ Just For Me No-Lye Conditioning Crème Relaxer Kit ☐ Just For Me No-Lye Conditioning Crème Relaxer Kit with Coil & Curl Cream ☐ Just For Me No-Lye Conditioning Crème Relaxer Kit (Super) with Oil Moisturize Lotion ☐ Just For Me No-Lye Texture Softener System ☐ Just For Me No-Lye Texture Softener System with Hair & Scalp Butter ☐ Motions Classic Formula Smooth & Silken Hair Relaxer ☐ Motions Professional 12-Application Salon Pack ☐ Silkening Shine No Lye Relaxer Kit ☐ Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 2 Touch Up Application ☐ Profectiv MegaGrowth Anti-Damage No-Lye Relaxer 1 Complete Touch Up Application ☐ Profectiv Procision Relaxer Kit Regular ☐ Profectiv Relax and Refresh Kit Auburn Spice ☐ Profectiv Relax and Refresh Kit Cherry Fusion ☐ Profectiv Relax and Refresh Kit Jet Black ☐ Profectiv Relax and Refresh Kit Mahogany Brown ☐ Profectiv Relax and Refresh Kit Silky Black

<u>Defendant</u>	<u>Product List (Select All Applicable Products)</u>
	☐ Pro-Line Comb Thru Texturizer Kit ☐ SmartPerm No-Lye Anti-Breakage Relaxer System ☐ SmartPerm No-Lye Anti-Breakage New Growth Relaxer System, Smart Grow Stimulator ☐ SmartPerm Smart Valu No-Lye Anti-Breakage Relaxer Kit, 4 Applications ☐ Smart Perm Smart Valu Smart Gro Stimulator New Growth No-Lye Relaxer with GroRehab 4 Applications ☐ S&B® Botanicals™ 2 Application Relaxer ☐ S&B® Botanicals™ No-Lye Sensitive Scalp Relaxer, 1-App ☐ S&B® Botanicals™ No-Mix Texturizer 2-App, with Deep Conditioner ☐ S&B® Botanicals™ No-Mix Texturizer 2-App ☐ S&B® Botanicals™ Relaxer 8-Touch Up ☐ Soft & Beautiful No-Lye Crème Relaxer ☐ Soft & Beautiful No-Lye Ultimate Conditioning Relaxer System ☐ TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer ☐ TCB Naturals Conditioning Argan Oil Vitamin E & Olive No-Lye Relaxer, 2 Applications ☐ TCB No-Base Crème Hair Relaxer with Protein & DNA ☐ UltraSheen Supreme Conditioning No-Lye Relaxer ☐ UltraSheen Ultra Moisturizing No-Lye Relaxer ☐ UltraSheen Ultra Moisturizing No-Lye Relaxer, with Keratin Other (please specify):_____

7. Other manufacturer(s)/product(s) used by Plaintiff not identified above:

8. Plaintiff's use of Defendant(s) hair relaxer product(s) caused serious injuries and damages including but not limited to the following:

- ☒ Uterine Cancer
- ☐ Endometrial Cancer
- ☐ Ovarian Cancer

- ☐ Other injuries and/or additional details (please specify): _____
- _____
- _____
- _____.

9. Approximate date(s) of diagnosis (injury(ies)), if applicable at this time, that form(s) the basis of Plaintiff's claim(s):

Condition	Date of Diagnosis
Uterine Cancer	2016

CAUSES OF ACTION AND THEORIES OF RECOVERY ADOPTED AND INCORPORATED IN THIS LAWSUIT

10. Plaintiff hereby adopts and incorporates by reference as if set forth fully herein, all common factual allegations contained in paragraphs 1 through 114 of the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060.

11. Plaintiff hereby adopts and incorporates by reference as if set forth fully herein, the following Causes of Action and the Prayer for Relief within the Master Long Form Complaint on file with the Clerk of the Court for the United States District Court for the Northern District of Illinois in the matter entitled *In Re: Hair Relaxer Marketing, Sales Practices, and Products Liability Litigation*, MDL No. 3060:

- ☒ Count I – Negligence and/or Gross Negligence

- ☒ Count II – Negligent Misrepresentation
 - ☒ Count III – Negligence *Per Se*
 - ☒ Count IV – Strict Liability: Design Defect
 - ☒ Count V – Strict Liability: Failure to Warn
 - ☒ Count VI – Breach of Implied Warranty of Merchantability/ Fitness for a Particular Use
 - ☒ Count VII – Breach of Express Warranty under state law and the Magnuson-Moss Warranty Act, 15 U.S.C. § 2301 et seq.
 - ☒ Count VIII – Fraud/ Fraudulent Misrepresentation
 - ☒ Count IX – Fraudulent Concealment
 - ☒ Count X – U.S. State and Territory Statutory Consumer Protection and Unfair or Deceptive Trade Practices Claims
 - ☒ Count XI – Unjust Enrichment
 - ☐ Count XII – Wrongful Death
 - ☐ Count XIII – Survival Action
 - ☐ Count XIV – Loss of Consortium
 - ☒ Count XV – Punitive Damages
 - ☐ Other Causes of Action:
-
-
-

12. Consortium Claim(s) (if applicable): The following individual(s) allege(s) damages for loss of consortium:

13. Survival and/or Wrongful Death Claim(s) (if applicable): The following individual(s) allege(s) damages for survival and/or wrongful death:

JURY DEMAND

Plaintiff demands a trial by jury as to all claims in this action.

Dated this the 19th day of January, 2024.

RESPECTFULLY SUBMITTED
ON BEHALF OF THE PLAINTIFF,

OF COUNSEL:

/s/ Syreeta Poindexter
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