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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

JANITA HAYES, <i>et al.</i>	)	Cases Consolidated for Pretrial and Discovery
	)	Purposes Under
<i>Plaintiffs,</i>	)	Case No. 2022 L 011132
	)	
v.	)	Calendar C1 - Judge Sarah Johnson
	)	
L'OREAL USA, INC.; L'OREAL USA	)	
PRODUCTS, INC.; SOFT SHEEN-	)	
CARSON LLC; SOFT SHEEN CARSON	)	
(W.I.), INC.; STRENGTH OF NATURE,	)	
LLC; GODREJ SON HOLDINGS, INC.;	)	
NAMASTE LABORATORIES, LLC;	)	
LUSTER PRODUCTS, INC.; AFAM	)	
CONCEPTS, INC. d/b/a JF LABS, INC.;	)	
AVLON INDUSTRIES INC.; BEUATY	)	
BELL ENTERPRISES, LLC f/k/a HOUSE	)	
OF CHEATHAM; and HOUSE OF	)	
CHEATHAM, LLC, <i>et al.</i>	)	
	)	
<i>Defendants.</i>	)	

AMENDED CASE MANAGEMENT ORDER NO. 1¹

4/23/24

This matter comes before the Court for ongoing case management of the Consolidated Hair Relaxer Cases. By agreement of the parties and advisement of the Court, this order sets forth the amendments to the case management plan entered on May 30, 2024. It is hereby ordered:

1. **Applicability of the Order.** The provisions of this order (and of future orders identified as applicable to all cases in this consolidated action) shall govern the practice and procedure in the actions, listed on Schedule A, that were transferred to this Court [Calendar C] by Judge Maura Slattery-Boyle (hereinafter "Judge Slattery-Boyle") pursuant to its order of May 8, 2023. This Order also applies to all related cases filed in the Law Division of Cook County ordered consolidated with the above-entitled actions.
2. **Scope of Order.** This Order shall govern all actions filed in or transferred to this consolidated proceeding.
3. **Supremacy of Order.** This Order shall replace and take supremacy over the May 30, 2024 Case Management Order No. 1, entered in these actions.
4. **Consolidation.** The civil actions consolidated with Case No. 2022-L-011132 are consolidated for discovery and pre-trial before Calendar C1 of the Cook County Law Division.

¹ A copy of this order and related documents can be found at <https://www.cookcountycourtill.gov/judge/johnson-sarah>.

5. **New Filings and Transfer to Consolidated Proceeding.** Any new filings must be filed as a standalone case and receive an individual case number. Once filed, any party can file an order transferring the newly filed cases into this consolidated proceeding (a.k.a., a Sweep Order), as follows:

In accordance with this Honorable Court's Consolidation Order dated May 8, 2023, it is hereby ORDERED that the matters set forth in Appendix A, be consolidated for pretrial and discovery purposes with Hayes v. L'Oreal USA, Inc., et al., NO. 2022 L 011132, and all other related consolidated cases previously assigned and/or reassigned and transferred to the any Judge assigned to Calendar C1 or any Judge subsequently assigned to matters consolidated with Hayes v. L'Oreal USA, Inc., et al.

6. **Adoption of the Master Complaint.** It is hereby ordered that the Fourth Amended Master Complaint filed on February 25, 2026, is adopted and will be the controlling complaint for all cases consolidated with Hayes v. L'Oreal USA, Inc., et al., Case No. 2022-L-011132, unless ordered otherwise by the Court.

7. **Service of Complaints.** To expedite and streamline service of newly filed complaints, the Defendants identified in the attached Schedule B have agreed to establish, maintain, and monitor an email address for the express purpose of accepting service of summons. Accordingly, plaintiffs who have complaints that have been consolidated into this proceeding and who have not yet served defendants shall effectuate service via email through compliance with the procedures for those Defendant(s) identified in Schedule B. Service shall be in accordance with the Illinois Code of Civil Procedure effectuated within 30 days of entry of this order. If any new Defendant is subsequently named in these consolidated proceedings, the new Defendant shall provide an email address for service via email to be effectuated within 30 days of entering an appearance or, if the new Defendant is challenging personal jurisdiction, within 30 days of an Order finding that this Court has personal jurisdiction over the new Defendant.

The failure to email a Defendant's appropriate service email address, as set forth above, shall constitute a failure to affect service on the Defendant, unless a Plaintiff chooses to serve process in another manner pursuant to the Illinois Code of Civil Procedure.

A Defendant shall have sixty (60) days from service via email pursuant to this paragraph to notify a plaintiff of any defect in service, including, but not limited to, the failure to provide any necessary documents with service. Any such defect shall be addressed via a meet and confer and, if that is not successful, Defendant(s) may move as appropriate. Absent the receipt of notification of a defect in service, a responsive email received by plaintiff that states that "[s]ervice of this responsive email shall serve as proof that Defendant, [insert name], has received actual notice of the legal action brought against them and service is complete" shall constitute good service under the Illinois Code of Civil Procedure and plaintiff need not file any further documents with the Court related to service.

If a Defendant fails to provide notice of defective service as set forth above, a Defendant's automated email response precludes any motion practice regarding deficient service. Further, a Defendant may not move to dismiss a complaint for failure to effectuate service unless and until that Defendant provides sixty (60) days written notice to plaintiff and provides an opportunity to effectuate service pursuant to this order and/or the Illinois Code of Civil Procedure.

Under no circumstances shall a Defendant's agreement to accept service by email be deemed to waive any defenses available to that Defendant, except that Affirmative Defense of lack of service. Nor shall a Defendant's agreement to accept service via email waive ordinary service requirements outside of these consolidated actions.

8. **Master Docket.** All pleadings and filings should be filed on the master docket, Case No. 2022-L-011132. When a pleading or filing is intended to be applicable to all actions, this shall be noted in the caption by the words: "This Document Relates to All Cases." When a pleading is intended to apply to fewer than all cases, this Court's docket number for the individual case or cases to which the document number relates shall appear in the caption immediately after the words: "This Document Relates to [individual case number(s)]"

9. **Filing Procedures.** Any pleading or document which is to be filed in any of these actions shall be filed with the Clerk of this Court and not in the transferor court. All documents filed in this Court must be filed electronically pursuant to the Standing Order for the judge presiding over Calendar C1, unless subsequently transferred and/or assigned to another judge.

10. **Adoption and Filing of Short Form Complaint².** It is hereby ordered that the Short Form Complaint filed with the Court on January 31, 2025, is adopted for all cases consolidated with Hayes v. L'Oreal USA, Inc., et al., Case No. 2022-L-011132. The Short Form Complaint is attached as Schedule C to this Order. Any currently consolidated Plaintiff who has not filed a Short Form Complaint in these consolidated cases as of entry of this order has 45 days to file and serve a Short Form Complaint on all parties. If a Plaintiff fails to file a Short Form Complaint in the time allotted by this order, that Plaintiff's case will be dismissed for want of prosecution pursuant to Ill. Sup. Ct. R. 103(b). To the extent a Plaintiff's Short Form Complaint is inconsistent with any earlier-filed complaint (e.g., in defendants named, claims brought), the later-filed Short Form Complaint will act as an amended complaint and control in all respects.

Any new Plaintiff whose case is later consolidated with Hayes v. L'Oreal USA, Inc., et al., Case No. 2022-L-011132, shall file a Short Form Complaint within 14 days of consolidation. If a Plaintiff fails to file a Short Form Complaint in the time allotted by this order that Plaintiff's case will be dismissed for want of prosecution pursuant to Ill. Sup. Ct. R. 103(b). To the extent a Plaintiff's Short Form Complaint is inconsistent with any earlier-filed complaint (e.g., in defendants named, claims brought), the later-filed Short Form Complaint will act as an amended complaint and control in all respects.

² The applicable short form complaint can be found at <https://www.cookcountycourtill.gov/judge/johnson-sarah>.

11. **Adoption of Master Discovery Requests.**³ It is hereby ordered that the Master Interrogatories Pursuant to Illinois Supreme Court Rule 213 submitted by the Defendants on January 23, 2025, and as amended by Court Order on November 21, 2025, are adopted for all cases consolidated with Hayes v. L'Oreal USA, Inc., et al., Case No. 2022-L-011132. These Master Interrogatories are deemed served on all currently consolidated cases and will be deemed served on all new plaintiffs on the date of filing their complaint or consolidation, whichever is later. A copy of the Master Interrogatories are attached as Schedule D.

It is hereby ordered that the Master Requests for Production Pursuant to Illinois Supreme Court Rule 214 submitted by the Defendants on January 23, 2025, are adopted for all cases consolidated with Hayes v. L'Oreal USA, Inc., et al., Case No. 2022-L-011132. These Master Requests for Production are deemed served on all currently consolidated cases and will be deemed served on all new plaintiffs consolidated on the date of filing their complaint or consolidation, whichever is later. A copy of the Master Requests for Production are attached as Schedule E.

It is hereby ordered that Illinois Supreme Court Rule 213(f) Interrogatories are deemed served on all parties currently consolidated with Hayes v. L'Oreal USA, Inc., et al., Case No. 2022-L-011132 and that all new Plaintiffs filing a case consolidated with Hayes v. L'Oreal USA, Inc., et al., Case No. 2022-L-011132 will be deemed served on the date of filing their complaint or consolidation, whichever is later. A copy of the Master 213(f) Interrogatories are attached as schedule F.

This Order incorporates all discrete changes to the Master Discovery and requirements for the scope in answering the Master Discovery as ordered by this Court on November 21, 2025, and in subsequent hearings. Failure to comply with said orders by any current or new plaintiff may result in sanctions under Illinois Supreme Court Rule 219(c).

12. **Answering Master Discovery.** All currently consolidated Plaintiffs will have 90 days from entry of this order to provide answers and required verifications for all Master Interrogatories, Master Requests for Productions, and Interrogatories Pursuant to 213(f). All new Plaintiffs will have 90 days from the date of filing their complaint or consolidation, whichever is later, to provide answers and verifications to Master Interrogatories, Master Request for Productions, and Master Interrogatories Pursuant to 213(f).

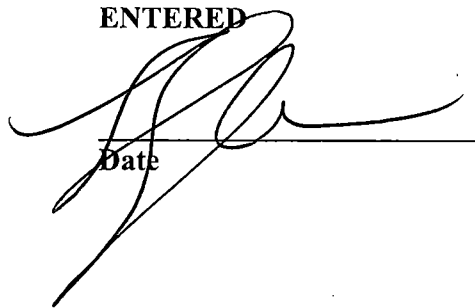
13. **Provision and Filing of HIPPA Order.** Within 21 days of entry of this order all Plaintiffs currently consolidated in this action shall provide a list of treaters and an executed HIPPA order adopted by the Circuit Court of Cook County to all named defendants in their action (to the extent a Plaintiff has not already done so). Defendants shall collect necessary signatures for the HIPPA and return the order to the Plaintiff for entry with the Court within 21 days of receipt from the Defendants.

All new Plaintiffs will have 21 days from the date of filing their complaint or consolidation, whichever is later, to provide an executed HIPPA order adopted by the Circuit

³ The Master Set of Interrogatories, the Master Set of Requests for Production, and the Standard 213(f) Interrogatories can be found at <https://www.cookcountycourt.il.gov/judge/johnson-sarah>.

Court of Cook County to all named defendants in their action. Plaintiff shall be responsible for collecting signatures of named defendants and entering the HIPPA order within 42 days of filing of their complaint or consolidation, whichever is later. All new Plaintiffs shall provide a list of medical treaters with their signed HIPPA order to all defendants named in their complaint within 21 days of filing their complaint or consolidation, whichever is later.

14. **Communications with the Court.** Unless otherwise ordered by this Court, all substantive communications with the Court shall be in writing, with copies to all counsel of record.

ENTERED

Date

ENTERED
Judge Sarah Johnson

SEP 24 2026

Circuit Court-2361