

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOE MC-1,

Plaintiff,

Case No. 2:20-CV-10568

v.

HON. PAUL D. BORMAN
HON. ELIZABETH A. STAFFORD

THE UNIVERSITY OF
MICHIGAN, THE REGENTS
OF THE UNIVERSITY OF
MICHIGAN (official capacity
Only)

Defendants.

**THE UNIVERSITY’S MOTION TO CONSOLIDATE CASES AND
FOR ORDERED FILING OF A MASTER COMPLAINT**

Defendant the Regents of the University of Michigan (the “University”)¹ moves under Federal Rule of Civil Procedure 42(a), and Local Rules 7.1 and 42.1, for an order consolidating 32 individual plaintiff cases with this one for pretrial purposes and ordering the filing of a long-form consolidated complaint. In support, the University relies on the attached brief and accompanying exhibit.

As Local Rule 7.1 requires, counsel for the University contacted Plaintiff’s counsel on April 2, 2020 to ask whether counsel would concur in the motion.

¹ The University of Michigan is an improper defendant. The Regents of the University of Michigan is the body corporate with the authority to be sued under law. *See* MCL 390.4.

Plaintiff responded that he concurs in (a)-(d) of the relief requested in the Conclusion of the Brief in Support the University's request.

Respectfully submitted,

BUSH SEYFERTH PLLC
*Attorneys for the Regents of the
University of Michigan*

By: /s/ Cheryl A. Bush _____

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Dated: April 3, 2020

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EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOE MC-1,

Plaintiff,

Case No. 20-CV-10568

v.

HON. PAUL D. BORMAN
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THE UNIVERSITY OF
MICHIGAN, THE REGENTS
OF THE UNIVERSITY OF
MICHIGAN (official capacity
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Defendants.

_____ /

**BRIEF IN SUPPORT OF THE UNIVERSITY'S MOTION
TO CONSOLIDATE CASES AND
FOR ORDERED FILING OF A MASTER COMPLAINT**

STATEMENT OF ISSUE PRESENTED

Counsel for Plaintiff in this case has filed 32 other actions in this District, each asserting the same legal theories, against the exact same defendant, premised on common, often-verbatim allegations. Consolidation would dramatically reduce the risk of inconsistent pretrial adjudication of 33 actions and would greatly advance the interests of judicial economy and efficiency, far outweighing any risk of prejudice or confusion. Under these circumstances, should the Court use Federal Rule of Civil Procedure 42(a) to consolidate this action with these other actions for pretrial purposes and order the filing of a master long-form complaint for the consolidated matters?

The University answers “Yes.”

Plaintiff answers “Yes, in part.”

This Court should answer “Yes.”

CONTROLLING OR MOST APPROPRIATE AUTHORITY

Fed. R. Civ. P. 42(a)

E.D. Mich. L.R. 42.1

In re Delphi ERISA Litig.,

230 F.R.D. 496, 498 (E.D. Mich. 2005)

Advey v. Celotex Corp.,

962 F.2d 1177 (6th Cir. 1992)

Great Lakes Anesthesia, PLLC v. State Farm Mut. Auto. Ins. Co.,

No. 11-CV-10658, 2011 WL 2472700 (E.D. Mich. June 22, 2011)

BACKGROUND

On March 4, 2020, John Doe MC-1 commenced this action by filing a complaint captioned *John Doe MC-1 v. University of Michigan and the Regents of the University of Michigan*, No. 20-CV-10568 (E.D. Mich.).² The entirety of Plaintiff’s 65-page Complaint, alleging 18 counts under federal and state law, springs from allegations of sexual misconduct by Dr. Robert Anderson while he was employed by the University’s Athletics department and Health Service. So too do the complaints filed by 32 other plaintiffs, represented by the same counsel³ (the “Doe MC cases”). In each, the factual allegations are nearly identical and the same 18 causes of action are raised. In each subsequent suit to this one, the plaintiff identified this case as a possible companion.

On March 10, 2010, this Court issued an Order in *Doe MC-1* declining to exercise supplemental jurisdiction over the state law claims, Dkt. # 6, and substantially similar orders have issued in some of the cases. Several cases have also

² The University of Michigan is an improper defendant. The Regents of the University of Michigan is the body corporate with the authority to be sued under law. *See* MCL 390.4; *see also Robinson v. Washtenaw Circuit Judge*, 228 Mich. 225, 230, 199 N.W. 618 (1924) (“[T]he Regents as a public body corporate have the right of suing and being sued in a proper case[.]”); *Ali v. Univ. of Michigan Health Sys.-Risk Mgmt.*, No. CIV.A. 11-13913, 2012 WL 3112419, at *3 (E.D. Mich. May 4, 2012), *report and recommendation adopted*, No. 11-CV-13913, 2012 WL 3110716 (E.D. Mich. July 31, 2012) (suit must be dismissed because, among other things, plaintiff failed to sue the proper party—the Board of Regents of the University of Michigan).

³ The Mike Cox Law Firm and Shea Aiello

been reassigned to this Court under E.D. Mich. Local Rule 83.11(b)(7)(D). But still, the Doe MC cases are currently assigned to 13 of the 22 active and senior judges, across both the Port Huron and Detroit courthouses, and all magistrate judges except Magistrate Judge Patti. The following Doe MC cases are currently pending:

Date filed	Plaintiff	E.D.Mich. No.	Judge (* denotes reassigned)	Suppl. Juris. Declined
3/4/2020	<i>Doe MC-1</i>	20-CV-10568	J. Borman	Yes
3/4/2020	<i>Doe MC-2</i>	20-CV-10578	J. Edmunds	Yes
3/5/2020	<i>Doe MC-3</i>	20-CV-10579	J. Drain	
3/5/2020	<i>Doe MC-4</i>	20-CV-10582	J. Lawson	
3/8/2020	<i>Doe MC-5</i>	20-CV-10621	J. Goldsmith	
3/5/2020	<i>Doe MC-6</i>	20-CV-10593	J. Borman*	Yes
3/5/2020	<i>Doe MC-7</i>	20-CV-10580	J. Roberts	
3/9/2020	<i>Doe MC-8</i>	20-CV-10640	J. Roberts	
3/9/2020	<i>Doe MC-9</i>	20-CV-10641	J. Steeh	Yes
3/6/2020	<i>Doe MC-10</i>	20-CV-10617	J. Friedman	
3/5/2020	<i>Doe MC-11</i>	20-CV-10596	J. Michelson	Yes
3/5/2020	<i>Doe MC-12</i>	20-CV-10595	J. Borman*	Yes
3/6/2020	<i>Doe MC-13</i>	20-CV-10614	J. Parker	
3/6/2020	<i>Doe MC-14</i>	20-CV-10618	J. Michelson	Yes
3/9/2020	<i>Doe MC-15</i>	20-CV-10631	J. Edmunds	Yes
3/8/2020	<i>Doe MC-16</i>	20-CV-10622	J. Borman*	Yes
3/11/2020	<i>Doe MC-17</i>	20-CV-10664	J. Borman*	Yes
3/17/2020	<i>Doe MC-18</i>	20-CV-10715	J. Lawson	
3/12/2020	<i>Doe MC-19</i>	20-CV-10679	J. Berg	Yes
3/13/2020	<i>Doe MC-20</i>	20-CV-10693	J. Friedman	
3/18/2020	<i>Doe MC-21</i>	20-CV-10731	J. Drain	
3/18/2020	<i>Doe MC-22</i>	20-CV-10732	J. Friedman	
3/23/2020	<i>Doe MC-23</i>	20-CV-10772	J. Borman*	Yes
3/23/2020	<i>Doe MC-24</i>	20-CV-10771	J. Drain	
3/21/2020	<i>Doe MC-25</i>	20-CV-10759	J. Lawson	
3/31/2020	<i>Doe MC-26</i>	20-CV-10828	J. Steeh	
3/26/2020	<i>Doe MC-27</i>	20-CV-10785	J. Roberts	
3/25/2020	<i>Doe MC-28</i>	20-CV-10779	J. Michelson	Yes
3/31/2020	<i>Doe MC-29</i>	20-CV-10832	J. Berg	

04/02/2020	<i>Doe MC-30</i>	20-CV-10861	J. Tarnow	
3/30/2020	<i>Doe MC-31</i>	20-CV-10821	J. Cleland	
3/30/2020	<i>Doe MC-32</i>	20-CV-10823	J. Steeh	
04/02/2020	<i>Doe MC-35</i> ⁴	20-CV-10859	C.J. Hood	

ARGUMENT

Federal Rule of Civil Procedure 42(a) allows the Court to consolidate actions that involve “a common question of law or fact.” Fed. R. Civ. P. 42.⁵ Both are present here. Each of the 33 Doe MC cases asserts the exact same causes of action premised on similar acts allegedly committed by Dr. Anderson. Pretrial motion practice will undoubtedly involve dozens of common legal issues, including, for example: how privacy and confidentiality should be protected; what, if any, acts by Dr. Anderson or others were done within the scope of employment; and the admissibility of evidence.

And beyond the few paragraphs of each complaint devoted to plaintiff-specific factual allegations, all the Doc MC cases assert scores of paragraphs of verbatim factual allegations. See Exhibit A (chart of Doe MC allegations). This level of factual and legal overlap necessitates consolidation. *See, e.g., In re Delphi ERISA Litig.*, 230 F.R.D. 496, 498 (E.D. Mich. 2005) (consolidating where cases “involve common questions of law and fact”); *Webb v. Just In Time, Inc.*, 769 F. Supp. 993,

⁴ No complaint has yet been filed by Doe MC-33 or Doe MC-34.

⁵ Throughout, unless otherwise noted, all emphasis and alterations are added, all internal quotation marks, citation, and footnotes are omitted.

994 (E.D. Mich. 1991) (consolidating actions with “issues of fact and law [that] are nearly identical” and the “same evidence will be involved in either supporting or refuting the parties’ allegations”); *Young v. Hamric*, No. 07-CV-12368, 2008 WL 2338606, at *4 (E.D. Mich. June 4, 2008) (consolidating three cases with the same overriding issue); *Tate v. Booker*, No. 06-CV-13156, 2007 WL 3038026, at *1 (E.D. Mich. Oct. 18, 2007) (“[W]hen the scope of consolidation is broad and the issues and parties are virtually identical, more leniency is permitted in treating the cases as one.”). Moreover, the Doe MC plaintiffs’ drafting appears to be an iterative process—with the allegations on each new complaint building on the last—resulting in inconsistencies across pleadings. For example, after John Doe MC-16 filed his complaint on March 8, his allegations became part of the common factual allegations in later-filed complaints. *See, e.g., Doe MC-18* (No. 20-CV- 10715), Dkt. #1, ¶¶ 37-44. A consolidated lead complaint would ensure that all parties are working from a single set of common allegations.

Consolidation allows the Court to “administer [its] business with expedition and economy while providing justice to the parties.” *Advey v. Celotex Corp.*, 962 F.2d 1177, 1180 (6th Cir. 1992). These 33 actions should be consolidated for pretrial purposes because they are based on the same allegations of wrongdoing against the same defendant, the risk of inconsistency in the pretrial litigation outweighs any possible prejudice, and consolidation will advance the interests of judicial economy

and efficiency. Here, different judges might reach conflicting rulings on the timing and scope of discovery, or on the viability of legal claims or defenses. These potential inconsistencies—not to mention duplication of effort—are the exact sort that consolidation exists to avoid. *See, e.g., Great Lakes Anesthesia, PLLC v. State Farm Mut. Auto. Ins. Co.*, No. 11-CV-10658, 2011 WL 2472700, at *1 (E.D. Mich. June 22, 2011) (“Geared toward increasing the efficient allocation of judicial resources, consolidation is proper especially when multiple proceedings would be largely duplicative.”); *Lear Corp. v. NHK Seating of Am. Inc.*, No. 13-CV-12937, 2019 WL 1242444, at *1 (E.D. Mich. Mar. 18, 2019) (noting that the “key considerations” in deciding a motion under Rule 42 are “the efficiency gains for the parties, the witnesses, and the Court if the two cases are consolidated” and the prejudice to the parties).

Consolidation is needed here to achieve judicial economy and efficiency. *See, e.g., Katz v. Realty Equities Corp. of New York*, 521 F.2d 1354, 1359 (2d Cir. 1975) (“It therefore appears clear that in the circumstances here present which involve complex and multifaceted actions with a number of similar complaints the adoption of a consolidated complaint is a device well-suited to achieving economies of effort on the part of the parties and of the court.”). As the cases stand, the University will need to make identical filings 33 times. Even the relatively simple process of noticing appearances in these cases required over 100 filings. Once the University

begins to substantively respond to the pleadings, there will be dozens of responsive filings asserting many of the same positions, to be decided by 13 different judges. *See supra* & Ex. A. Beyond that, even if each presiding judge were to consolidate his or her own cases, there would still be more than a dozen scheduling orders with potentially conflicting deadlines.

Each presiding judge will either need to reach independent determinations (and risk inconsistent rulings and obligations) or adopt any earlier related decisions of their colleagues (and attempt to ensure uniformity of outcomes). The former wastes valuable judicial resources and time; the latter is effectively consolidation without the efficiencies. A *de facto* consolidation would lack the procedural protections that prevent parties from presenting an issue first to a presiding judge perceived to be more favorable; what's more, it would slow the entire process down, as judges presiding in "trailing" cases wait for the unofficial "lead" judge to act before they do. *See Gamboa v. Ford Motor Co.*, 381 F. Supp. 3d 853, 866 (E.D. Mich. 2019) (explaining that the court should consider "the length of time required to conclude multiple suits as against a single one" in deciding question of consolidation). These concerns can be avoided by ordering consolidation and a single consolidated long-form complaint that incorporates all Doe MC plaintiffs' common allegations, along with short-form complaints for each plaintiff's unique allegations. The University can respond to the long-form complaint once, and the consolidated action can be put

on a single unified schedule.

Avoiding a multiplicity of proceedings not only has the benefit of practical convenience—it also protects this Court against inconsistent and conflicting rulings. Multiple actions running in parallel before several judges of the same court will, at best, result in the delay-and-parrot effect referenced above. But that’s best case. Worst case is dozens of *different* answers to the same questions. Where, as here, core factual allegations and common law lead to different rulings, the result appears arbitrary (or lawless). These perceptions damage the reputation and integrity of the judiciary, particularly in a well-publicized case like this one. Consolidation should be ordered now.

One final point: the Court need not defer consolidation just because the state-law claims remain pending in some cases. Grounds for consolidation exist between actions with and without state-law claims. Doe MC plaintiffs’ federal and state legal claims turn on the same alleged acts or omissions, so the evidence and issues presented in all actions will be substantially similar. And it is of course within the Court’s discretion to decline to exercise supplemental jurisdiction over state-law claims *after* consolidation.⁶ The supplemental state-law claims are not an obstacle to the efficient management of this case through consolidation. If anything, the

⁶ The University has offered the Doe MC plaintiffs an agreement that would toll any state-law claims for which supplemental jurisdiction is declined.

current disparate treatment of the supplemental-jurisdiction issue is a factor favoring consolidation, not weighing against it. If things stay the way they are now, the same claims will be scattered across multiple forums, creating even more scheduling and coordination inefficiencies.

CONCLUSION

The University seeks an Order consolidating the Doe-MC cases, ordering a master long-form complaint, and setting a status conference. Specifically, the University requests an Order stating:

- a. Under Federal Rule of Civil Procedure 42(a), the following cases are consolidated for all pretrial purposes with *John Doe MC-1 v. University of Michigan and the Regents of the University of Michigan*, No. 20-CV-10568 (E.D. Mich.):

- *Doe MC-2 v. Univ. of Michigan et al.*, No. 20-CV-10578 (E.D. Mich., filed March 5, 2020)
- *Doe MC-3 v. Univ. of Michigan et al.*, No. 20-CV-10579 (E.D. Mich., filed March 5, 2020)
- *Doe MC-4 v. Univ. of Michigan et al.*, No. 20-CV-10582 (E.D. Mich., filed March 5, 2020)
- *Doe MC-5 v. Univ. of Michigan et al.*, No. 20-CV-10621 (E.D. Mich., filed March 8, 2020)
- *Doe MC-6 v. Univ. of Michigan et al.*, No. 20-CV-10593 (E.D. Mich., filed March 5, 2020)
- *Doe MC-7 v. Univ. of Michigan et al.*, No. 20-CV-10580 (E.D. Mich., filed March 5, 2020)

- *Doe MC-8 v. Univ. of Michigan et al.*, No. 20-CV-10640 (E.D. Mich., filed March 9, 2020)
- *Doe MC-9 v. Univ. of Michigan et al.*, No. 20-CV-10641 (E.D. Mich., filed March 9, 2020)
- *Doe MC-10 v. Univ. of Michigan et al.*, No. 20-CV-10617 (E.D. Mich., filed March 6, 2020)
- *Doe MC-11 v. Univ. of Michigan et al.*, No. 20-CV-10596 (E.D. Mich., filed March 5, 2020)
- *Doe MC-12 v. Univ. of Michigan et al.*, No. 20-CV-10595 (E.D. Mich., filed March 5, 2020)
- *Doe MC-13 v. Univ. of Michigan et al.*, No. 20-CV-10614 (E.D. Mich., filed March 6, 2020)
- *Doe MC-14 v. Univ. of Michigan et al.*, No. 20-CV-10618 (E.D. Mich., filed March 6, 2020)
- *Doe MC-15 v. Univ. of Michigan et al.*, No. 20-CV-10631 (E.D. Mich., filed March 9, 2020)
- *Doe MC-16 v. Univ. of Michigan et al.*, No. 20-CV-10622 (E.D. Mich., filed March 8, 2020)
- *Doe MC-17 v. Univ. of Michigan et al.*, No. 20-CV-10664 (E.D. Mich., filed March 11, 2020)
- *Doe MC-18 v. Univ. of Michigan et al.*, No. 20-CV- 10715 (E.D. Mich., filed March 17, 2020)
- *Doe MC-19 v. Univ. of Michigan et al.*, No. 20-CV-10679 (E.D. Mich., filed March 12, 2020)
- *Doe MC-20 v. Univ. of Michigan et al.*, No. 20-CV-10693 (E.D. Mich., filed March 13, 2020)
- *Doe MC-21 v. Univ. of Michigan et al.*, No. 20-CV- 10731 (E.D. Mich., filed March 18, 2020)

- *Doe MC-22 v. Univ. of Michigan et al.*, No. 20-CV- 10732 (E.D. Mich., filed March 18, 2020)
- *Doe MC-23 v. Univ. of Michigan et al.*, No. 20-CV- 10772 (E.D. Mich., filed March 23, 2020)
- *Doe MC-24 v. Univ. of Michigan et al.*, No. 20-CV-10771 (E.D. Mich., filed March 23, 2020)
- *Doe MC-25 v. Univ. of Michigan et al.*, No. 20-CV-10759 (E.D. Mich., filed March 21, 2020)
- *Doe MC-26 v. Univ. of Michigan et al.*, No. 20-CV-10828 (E.D. Mich., filed March 31, 2020)
- *Doe MC-27 v. Univ. of Michigan et al.*, No. 20-CV-10785 (E.D. Mich., filed March 26, 2020)
- *Doe MC-28 v. Univ. of Michigan et al.*, No. 20-CV-10779 (E.D. Mich., filed March 25, 2020)
- *Doe MC-29 v. Univ. of Michigan et al.*, No. 20-CV-10832 (E.D. Mich., filed March 31, 2020)
- *Doe MC-30 v. Univ. of Michigan et al.*, No. 20-CV-10861 (E.D. Mich., filed April 2, 2020)
- *Doe MC-31 v. Univ. of Michigan et al.*, No. 20-CV-10832 (E.D. Mich., filed March 30, 2020)
- *Doe MC-32 v. Univ. of Michigan et al.*, No. 20-CV-10823 (E.D. Mich., filed March 30, 2020)
- *Doe MC-35 v. Univ. of Michigan et al.*, No. 20-CV-10859 (E.D. Mich., filed April 2, 2020)

b. The Master Docket and Master File for the Consolidated Action shall remain Civil Action No. 20-CV-10568.

c. The caption for the Consolidated Action shall become:

JOHN DOE MC-1 *et al*

v.

THE REGENTS OF THE UNIVERSITY
OF MICHIGAN (official capacity
only)

No. 2:20-cv-10568-PDB-EAS

- d. The Doe MC plaintiffs shall file a Master Long-Form Complaint with the common, cross-plaintiff allegations within 30 days of entry of the order of consolidation;
- e. Future suits brought by Doe MC plaintiffs related to Dr. Robert Anderson shall be brought under the Consolidated Action;
- f. The Court will thereafter set the matter for a status conference—at which time, the parties will discuss the scope and contents of short-form complaints, the University’s time and method of response, and any other relevant issues to progressing the matter;
- g. All prior briefing schedules and response dates in the individual actions are vacated. The University need not respond to those complaints.
- h. Neither the Doe MC plaintiffs nor the University waive their rights to seek additional adjournments or extensions.
- i. This Order is not and shall not be construed as a waiver of any of the above-named parties’ jurisdictional, substantive, or procedural rights and remedies in connection with the above-captioned proceedings, all of which are

expressly reserved.

Respectfully submitted,

/s/ Cheryl A. Bush

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*Attorneys for the Regents of
the University of Michigan*

Dated: April 3, 2020

Exhibit A

Doe MC #	JX, Venue, and Parties	Common Facts	Plaintiff's specific facts		Plaintiff's damages		Alleged fraudulent concealment	Count I: Title IX	Count II: § 1983 State Created Danger	Count III: § 1983 Bodily Integrity	Count IV: § 1983 Failure to Train / Supervise	Counts V - XVIII State Claims	Damages for all causes of action
1	¶¶10-21	¶¶22-66	¶¶67-91; 101	¶¶92-100; 102-103	¶109	¶¶104-108; 110-112	¶139a ¶¶113-138; 139b-146	¶¶147-163	¶¶164-174	¶¶175-187	¶¶188-194	¶¶195-307	¶¶308-313
2	¶¶10-21	¶¶22-66	¶¶67-95	¶¶96-106	¶¶109; 112	¶¶107-108; 110-111; 113-115	¶¶116-149	¶¶150-166	¶¶167-177	¶¶178-190	¶¶191-197	¶¶198-310	¶¶311-316
3	¶¶10-21	¶¶22-66	¶¶67-93	¶¶94-104	¶110	¶¶105-109; 111-113	¶¶114-147	¶¶148-164	¶¶165-175	¶¶176-188	¶¶189-195	¶¶196-308	¶¶309-314
4	¶¶10-21	¶¶22-66	¶¶67-92	¶¶93-102		¶¶103-111	¶¶112-145	¶¶146-162	¶¶163-173	¶¶174-186	¶¶187-193	¶¶194-306	¶¶307-312
5	¶¶10-21	¶¶22-74	¶¶75-98	¶¶99-109	¶115	¶¶110-114; 116-118	¶¶119-152	¶¶153-169	¶¶170-180	¶¶181-193	¶¶194-200	¶¶201-313	¶¶314-319
6	¶¶10-21	¶¶22-66	¶¶67-94	¶¶95-103	¶¶106-107	¶¶104-105; 108-114	¶¶115-148	¶¶149-165	¶¶166-176	¶¶177-189	¶¶190-196	¶¶197-309	¶¶310-315
7	¶¶10-21	¶¶22-66	¶¶67-94	¶¶95-103		¶¶104-112	¶¶113-146	¶¶147-163	¶¶164-174	¶¶175-187	¶¶188-194	¶¶195-307	¶¶308-313
8	¶¶10-22	¶¶23-75	¶¶76-99	¶¶100-109		¶¶110-118	¶¶119-152	¶¶153-169	¶¶170-180	¶¶181-193	¶¶194-200	¶¶201-313	¶¶314-319
9	¶¶10-22	¶¶23-75	¶¶76-99	¶¶100-109		¶¶110-118	¶¶119-152	¶¶153-169	¶¶170-180	¶¶181-193	¶¶194-200	¶¶201-313	¶¶314-319
10	¶¶10-21	¶¶22-66	¶¶67-92	¶¶93-102		¶¶103-111	¶¶112-145	¶¶146-162	¶¶163-173	¶¶174-186	¶¶187-193	¶¶194-306	¶¶307-312
11	¶¶10-21	¶¶22-66	¶¶67-93	¶¶94-104	¶¶110-112	¶¶105-109; 111-115	¶¶116-149	¶¶150-166	¶¶167-177	¶¶178-190	¶¶191-197	¶¶198-310	¶¶311-316
12	¶¶10-21	¶¶22-66	¶¶67-92	¶¶93-102		¶¶103-111	¶¶112-145	¶¶146-162	¶¶163-173	¶¶174-186	¶¶187-193	¶¶194-306	¶¶307-312
13	¶¶10-21	¶¶22-66	¶¶67-92	¶¶93-102	¶108-110	¶¶103-107; 111-112	¶¶114-147	¶¶148-164	¶¶165-175	¶¶176-188	¶¶189-195	¶¶196-308	¶¶309-314
14	¶¶10-21	¶¶22-66	¶¶67-91	¶¶92-103		¶¶104-112	¶¶113-146	¶¶147-163	¶¶164-174	¶¶175-187	¶¶188-194	¶¶195-307	¶¶308-313
15	¶¶10-21	¶¶22-66	¶¶67-80	¶¶81-91		¶¶92-100	¶¶101-134	¶¶135-151	¶¶152-162	¶¶163-175	¶¶176-182	¶¶183-295	¶¶296-301
16	¶¶10-21	¶¶22-74	¶¶75-100	¶¶101-111		¶¶112-120	¶¶121-154	¶¶155-171	¶¶172-182	¶¶183-195	¶¶196-202	¶¶203-315	¶¶316-321
17	¶¶10-22	¶¶23-75	¶¶76-99	¶¶100-109	¶112	¶¶110-11; 113-118	¶¶119-152	¶¶153-169	¶¶170-180	¶¶181-193	¶¶194-200	¶¶201-313	¶¶314-319
18	¶¶8-21	¶¶22-74	¶¶75-91	¶¶92-101	¶104-105	¶¶102-103; 106-110	¶¶111-144	¶¶145-161	¶¶162-173	¶¶174-186	¶¶187-193	¶¶194-306	¶¶307-312
19	¶¶10-22	¶¶23-75	¶¶76-98	¶¶99-108		¶¶109-117	¶¶118-151	¶¶152-168	¶¶169-179	¶¶180-192	¶¶193-199	¶¶200-312	¶¶313-318
20	¶¶10-22	¶¶23-75	¶¶76-96	¶¶97-106		¶¶107-115	¶¶116-149	¶¶150-166	¶¶167-177	¶¶178-190	¶¶191-197	¶¶198-310	¶¶311-316
21	¶¶10-22	¶¶23-75	¶¶76-95	¶¶96-105		¶¶106-114	¶¶115-148	¶¶149-165	¶¶166-176	¶¶177-189	¶¶190-196	¶¶197-309	¶¶310-315
22	¶¶10-22	¶¶23-75	¶¶76-100	¶¶101-110		¶¶111-119	¶¶120-153	¶¶154-170	¶¶171-181	¶¶182-194	¶¶195-201	¶¶202-314	¶¶315-320
23	¶¶12-24	¶¶25-77	¶¶78-111	¶¶112-121		¶¶122-130	¶¶131-164	¶¶165-181	¶¶182-192	¶¶193-205	¶¶206-212	¶¶213-325	¶¶326-331
24	¶¶10-22	¶¶23-75	¶¶76-94	¶¶95-104	¶107	¶¶105-106; 108-113	¶¶114-147	¶¶148-164	¶¶165-175	¶¶176-188	¶¶189-195	¶¶196-309	¶¶310-315
25	¶¶11-23	¶¶24-76	¶¶77-97	¶¶98-107		¶¶108-116	¶¶117-150	¶¶151-167	¶¶168-178	¶¶179-191	¶¶192-198	¶¶199-312	¶¶313-318
26	¶¶11-23	¶¶24-94	¶¶95-120	¶¶121-130	¶134	¶¶131-133; 135-140	¶¶141-174	¶¶175-191	¶¶192-202	¶¶203-215	¶¶216-222	¶¶223-335	¶¶336-341
27	¶¶13-25	¶¶26-78	¶¶79-110	¶¶111-119		¶¶120-128	¶¶129-162	¶¶163-179	¶¶180-190	¶¶191-203	¶¶204-210	¶¶211-323	¶¶324-329
28	¶¶10-22	¶¶23-87	¶¶88-113	¶¶114-123	¶126, 130	¶¶124-125; 127-129; 131-133	¶¶134-167	¶¶168-184	¶¶185-195	¶¶196-208	¶¶209-215	¶¶216-328	¶¶329-334
29	¶¶11-23	¶¶24-89	¶¶90-113	¶¶114-123		¶¶124-132	¶¶133-166	¶¶167-183	¶¶184-194	¶¶195-207	¶¶208-214	¶¶215-327	¶¶328-333
30	¶¶11-23	¶¶24-94	¶¶95-121	¶¶122-131		¶¶132-140	¶¶141-174	¶¶175-191	¶¶192-202	¶¶203-215	¶¶216-222	¶¶223-335	¶¶336-341
31	¶¶11-23	¶¶24-94	¶¶95-118	¶¶119-128		¶¶129-137	¶¶138-171	¶¶172-188	¶¶189-199	¶¶200-212	¶¶213-219	¶¶220-332	¶¶333-338
32	¶¶11-23	¶¶24-94	¶¶95-120	¶¶121-131		¶¶132-140	¶¶141-174	¶¶175-191	¶¶192-202	¶¶203-215	¶¶216-222	¶¶223-335	¶¶336-341
35	¶¶11-23	¶¶24-94	¶¶95-122	¶¶123-132		¶¶133-141	¶¶142-175	¶¶176-192	¶¶193-203	¶¶204-216	¶¶217-223	¶¶224-336	¶¶337-342

Key

- Substantially verbatim allegations (compared to latest-filed complaint)
- Unique allegations
- Claims dismissed