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11 **SUPERIOR COURT OF CALIFORNIA**  
12 **FOR THE COUNTY OF LOS ANGELES**

13 A.B., an individual; and C.D., an individual,

14 Plaintiffs,

15 v.

16 COOPERSURGICAL, INC.; THE  
17 COOPER COMPANIES, INC.; and DOES  
18 1-50, inclusive,

19 Defendants.

Case No.

**COMPLAINT**

1. STRICT PRODUCTS LIABILITY—  
MANUFACTURING DEFECT
2. STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT
3. STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN
4. NEGLIGENCE
5. NEGLIGENT FAILURE TO RECALL

**DEMAND FOR JURY TRIAL**

1 Plaintiffs A.B. and C.D. (collectively, "Plaintiffs") respectfully bring this Complaint  
2 against Defendants COOPERSURGICAL, INC. and THE COOPER COMPANIES, INC.;  
3 (collectively, "Cooper" or "Defendants"), and allege as follows:

4 **NATURE OF THE ACTION**

5 1. Defendants' defective product and negligent conduct destroyed Plaintiffs' precious  
6 and irreplaceable embryos.

7 2. Defendants manufactured, marketed, promoted, distributed, and/or sold media to be  
8 used for culturing and developing human embryos. Defendants marketed that their media provided  
9 "an optimized in vitro environment," which is necessary to ensure that fertilized human eggs can  
10 survive and develop into embryos viable for implantation.

11 3. Defendants further represented that they properly and adequately tested their  
12 embryo culture media before making the media available to the public, including to clinics who  
13 would use such embryo culture media for the storage of human embryos. They further claimed:  
14 "Our world class ISO 13485 and ISO 9001 certified manufacturing site consistently maintains the  
15 highest standards for product quality and reliability."

16 4. Despite these representations, Defendants did not sufficiently test the embryo  
17 culture media that they manufactured, marketed, promoted, distributed, and/or sold. As a result,  
18 they sold defective lots of embryo culture media, which turned out to be toxic to human embryos,  
19 eggs, and sperm.

20 5. Defendants' manufacturing, marketing, promoting, distributing, and/or selling its  
21 defective and toxic culture media resulted in the death of Plaintiffs' embryos.

22 6. Only after Plaintiffs' embryos died upon coming into contact with Defendants'  
23 defective embryo culture media did Defendants recall multiple lots of its culture media, including a  
24 lot that ruined Plaintiffs' embryos.

25 **PARTIES**

26 7. Plaintiff A.B. is a citizen of Los Angeles, California.

27 8. Plaintiff C.D. is a citizen of Los Angeles, California.

1           9.       Given the sensitive nature of their claims, Plaintiffs are using pseudonymous initials  
2 in this litigation to protect their privacy. If the Court so requires, Plaintiffs will seek permission to  
3 proceed under these pseudonyms.

4           10.       Defendant THE COOPER COMPANIES, INC. is a global medical device  
5 corporation boasting worldwide revenues of \$3.6 billion. It is a Delaware corporation with its  
6 principal place of business in San Ramon, California. At all relevant times herein, Defendant THE  
7 COOPER COMPANIES, INC. is, and at all relevant times herein was, and is authorized to conduct  
8 business within the State of California, and distributed its products, including the above-referenced  
9 embryo culture media, within the State of California, including in Los Angeles County.

10          11.       Defendant COOPERSURGICAL, INC. is a wholly owned subsidiary of The  
11 Cooper Companies. COOPERSURGICAL, INC. is a Delaware corporation, with its principal  
12 place of business in Trumbull, Connecticut. Defendant primarily manufactures medical devices for  
13 women’s healthcare and fertility markets. At all relevant times herein, Defendant CooperSurgical  
14 was and is authorized to conduct business within the State of California, and distributed its  
15 products, including the above-referenced embryo culture media, within the State of California.

16          12.       The Cooper Companies and CooperSurgical have worked quickly to solidify their  
17 primacy in the lucrative fields of reproductive and fertility healthcare, acquiring competitors to  
18 secure their place. In April 2018, CooperSurgical acquired LifeGlobal, a leading global provider of  
19 in vitro fertilization devices—including in vitro fertilization (“IVF”) media—for \$125 million  
20 dollars. In January 2021, it acquired Embryo Options, a company that provided streamlined case  
21 management and billing options for fertility clients. The following month, it acquired AEGEA  
22 Medical, a California-based medical manufacturing company that creates devices used in  
23 reproductive medicine. In March 2021, it acquired Safe Obstetric Systems, another company that  
24 manufactures reproductive medical devices, for \$52 million dollars.

25          13.       In November 2021, CooperSurgical acquired Generate Life Sciences, a purveyor of  
26 donor sperm and eggs, as well as other fertility services, for \$1.6 billion. In February 2022,  
27 CooperSurgical acquired Cook Medical’s reproductive health business for \$875 million. This  
28

1 company produces medical devices for fertility, obstetrics, gynecology, IVF, and assisted  
2 reproductive technology (“ART”).

3 14. Following this significant consolidation of the fertility medical device industry,  
4 fertility clinicians have reported a decline in Defendants’ customer service and product quality.

5 15. Plaintiffs are unaware of the true names or capacities, whether they are individuals  
6 or business entities, of Defendants DOES 1-50, and therefore sue them by such fictitious names  
7 pursuant to California Code of Civil Procedure section 474. Plaintiffs will seek leave of this Court  
8 to insert the true names and capacities once they have been ascertained.

9 16. Plaintiffs are informed and believe, and on that basis allege, that at all times  
10 material hereto: Defendants were, actually or ostensibly, the agents, representatives, and/or  
11 employees of each and every other Defendant; Defendants were acting within the course and scope  
12 of said alternative personality, capacity, identity, agency, representation, and/or employment;  
13 Defendants were the trustees, partners, servants, joint venturers, shareholders, co-conspirators,  
14 contractors, and/or employees of each and every other Defendant; the acts and omissions alleged  
15 herein, while committed individually, were made by Defendants through such capacity, and within  
16 the scope of their authority, and with the permission and consent of each and every other  
17 Defendant, as to make Defendants jointly and severally liable to Plaintiffs for the acts and  
18 omissions alleged herein.

19 **JURISDICTION AND VENUE**

20 17. This Court has jurisdiction over the entire action by virtue of the fact that this is a  
21 civil action wherein the matter in controversy, exclusive of interest and costs, exceeds the  
22 jurisdictional minimum of the Court.

23 18. This Court has personal jurisdiction over all Defendants. Each Defendant is, and at  
24 all relevant times herein was, a citizen of and/or authorized to conduct business in the State of  
25 California and/or conducted such business within the State of California, including the actions,  
26 dealings, and/or omissions that caused or contributed to the harm giving rise to this action.



1 older at the time of a natural conception and pregnancy. The most determinative factor in IVF  
2 success is the woman's age when her eggs were extracted.

### 3 **The Importance of Embryo Culture Media in IVF**

4 27. Embryo culture media plays a pivotal role in the IVF process. The culture media  
5 serves as the essential substance in which an egg is immersed, typically in a petri dish, when it is  
6 fertilized and during its development in the lab.

7 28. Embryo culture media is composed of a salt solution with the addition of other  
8 components, such as magnesium, carbohydrates (pyruvate, lactate, and glucose), and amino acids.

9 29. After egg retrieval, the embryologist fertilizes the eggs with sperm, and then the  
10 fertilized eggs develop to the blastocyst stage—typically, during a typical period of five to seven  
11 days when they are in the culture media.

12 30. Embryologists closely monitor cell development during this time period to  
13 determine if the embryos are developing as intended. The count begins on “Day 0,” or the day the  
14 eggs were fertilized with sperm. On Day 1, the embryologists typically assess the eggs to see  
15 which have successfully fertilized and become embryos. Between Day 1 and Day 3, the embryos  
16 typically begin cell division in the “cleavage stage.” By Day 4, the embryos typically enter the  
17 “morula stage,” characterized by a compacted mass of cells. By Day 5, the embryo typically re-  
18 expands to the blastocyst stage, in which the embryo shows two distinct groups of cells: a distinct  
19 inner cell mass and an outer globe of cells.

20 31. All embryo development is slightly different, and some embryos may develop later  
21 than others; but typically, fertilized eggs that do not develop to blastocyst by the seventh day are  
22 not considered viable. The embryo culture media in a petri dish supports and protects the  
23 developing embryos in these critical early stages, just as a woman's body would do during natural  
24 conception.

25 32. The resulting embryos then can be transferred to the uterus, where a baby can form.  
26  
27  
28

1 **Defendants' Embryo Culture Media**

2 33. Defendants marketed and promoted their embryo culture media for use as the  
3 essential medium in which fertility clinics can fertilize eggs and create the embryos that would be  
4 the future children of fertility clients like Plaintiffs.

5 34. Defendants further marketed and represented that their embryo culture media is  
6 subject to rigorous testing to ensure it is the highest quality embryo culture media available.

7 35. Moreover, Defendants marketed and promoted that all their embryo culture media  
8 was properly tested, and thus that it could be relied upon and/or posed no harm in use with  
9 growing human embryos.

10 36. Specifically, CooperSurgical claims “[q]uality is our cornerstone,” stating its  
11 “products undergo thorough quality testing before being released, to ensure consistent quality for  
12 your piece of mind.”

13 37. Defendants manufactured, marketed, distributed, and/or sold their embryo culture  
14 media while promoting that their embryo culture media was tested by superior methods to ensure  
15 that the culture was not missing key ingredients and that no embryotoxic exposure occurred.

16 38. Defendants knew that sterility and quality control are crucial to ensure that  
17 developing embryos in culture media are not harmed. Microbiological contamination or  
18 improperly created culture (*e.g.*, culture with missing ingredients) may kill the embryos it contacts.

19 39. Microbiological contamination or improperly created culture (*e.g.*, culture with  
20 missing ingredients) can cause DNA fragmentation, non-viable embryos, poor-quality embryos,  
21 early pregnancy loss, preterm birth, birth defects, and/or predisposition to serious medical  
22 conditions.

23 40. Microbiological contamination or improperly created culture (*e.g.*, culture with  
24 missing ingredients) can increase financial costs to both the patient and the clinics.

25 41. Defendants knew or should have known that some of their embryo culture media  
26 was not properly and/or adequately manufactured, properly and/or adequately tested, and/or  
27 properly and/or adequately inspected for contamination, and thus posed a severe risk to the human  
28 embryos that the culture media would contact.

1 **Defendants' Recall of Their Embryo Culture Media**

2 42. On information and belief, in late 2023, Defendants issued a recall of several lots of  
3 their embryo culture media, including LGGG Lots 231020-018741, 231020-018742, and 231020-  
4 018743 (the "Recalled Embryo Culture Lots.")

5 43. However, on information and belief, Defendants intentionally did not immediately  
6 disseminate notice of the Recalled Lots publicly or throughout the IVF community.

7 44. On information and belief, Defendants previously have manufactured and sold  
8 numerous products used in ART, including other culture media, that were defective and sometimes  
9 recalled.

10 **Defendants Knew or Should Have Known That the Recalled Embryo Culture Lots**  
11 **Posed an Unreasonable Risk of Toxicity to Viable Embryos**

12 45. As a manufacturer and distributor of numerous ART products, including culture  
13 media, Defendants knew that contaminated, improperly manufactured/assembled, and/or toxic  
14 culture media could kill human embryos upon contact, have significant and adverse consequences  
15 for the survival outcome of embryos created through ART, and/or harm the children that result from  
16 those embryos. Accordingly, Defendants knew it was vitally important that their culture media was  
17 properly assembled, composed, tested and/or inspected prior to the distribution of such media.

18 46. Despite this, Defendants failed to properly inspect, assemble, compose, and/or test  
19 its culture media, including the Recalled Embryo Culture Lots. Defendants knowingly put their  
20 culture media into the market when they knew or should have known that the Recalled Embryo  
21 Culture Lots posed a substantial and unacceptable risk to human embryos, including Plaintiffs'  
22 embryos.

23 47. As a manufacturer of numerous products for use in ART, Defendants knew that  
24 people go to extraordinary lengths to obtain and use viable human embryos. Defendants knew that  
25 people place an extremely high value on their embryos, make substantial emotional and financial  
26 investments for their embryos, and expect that great care will be taken to preserve and protect the  
27 embryos in order to avoid irreparable harm to their embryos.



1           48. Defendants’ conduct was despicable and was carried out by Defendants with a  
2 willful and conscious disregard of the rights and/or safety of others, including putting Defendants’  
3 profits over the safety of others, including Plaintiffs. Defendants’ conduct subjected Plaintiffs to  
4 cruel and unjust hardship in conscious disregard of Plaintiffs’ rights. Moreover, as discussed  
5 herein, Defendants’ conduct amounted to a deceit and/or concealment of material fact(s) known to  
6 Defendants with the intention on the part of Defendants to deprive individuals of property and/or  
7 legal rights and/or otherwise cause injury.

8                           **Plaintiffs’ Embryos Were Destroyed By the Recalled Embryo Culture Lots**

9           49. Plaintiffs utilized ART to try to fulfill their dream of having biological children. To  
10 that end, Plaintiffs entrusted a fertility clinic in Los Angeles, California to create their embryos in  
11 order to have a child.

12           50. In approximately November 2023, Plaintiff A.B. underwent an egg-retrieval  
13 procedure that—to Plaintiffs’ delight—yielded more eggs retrieved than any of her prior egg-  
14 retrieval procedures.

15           51. Numerous embryos were created using A.B.’s eggs and Plaintiff C.D.’s sperm.

16           52. Plaintiffs’ excitement at a chance to become parents was short-lived: Plaintiffs’  
17 fertility doctor told them that all but one of their embryos suddenly stopped growing/had arrested  
18 development between Day 3 and Day 5. (The remaining embryo turned out to be unusable.)

19           53. Plaintiffs’ fertility doctor was shocked by the highly unusual result that the embryos  
20 were not developing into blastocysts. He decided to investigate, and told Plaintiffs that he learned  
21 directly from Defendants that their embryo culture media was defective and the cause of the  
22 destruction of Plaintiffs’ precious embryos.

23           54. Plaintiffs’ doctor told Plaintiffs that their embryos were viable prior to coming into  
24 contact with the media, and then were killed by exposure to the media.

25           55. Plaintiffs are devastated. They may no longer be able to have children with their  
26 genetic material as a result of Defendants’ conduct.

1 **FIRST CAUSE OF ACTION**

2 **STRICT PRODUCTS LIABILITY—MANUFACTURING DEFECT**

3 56. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
4 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

5 57. At all times relevant herein, Defendants manufactured, distributed, and/or sold  
6 embryo culture media to be used with human embryos, including the Recalled Embryo Culture  
7 Lots.

8 58. At the time the Recalled Embryo Culture Lots left Defendants' possession, the  
9 Recalled Embryo Culture Lots contained a manufacturing defect, such that they differed from  
10 Defendants' intended result. This deviation included, but was not necessarily limited to,  
11 difference(s) in the chemical structure or composition of the Recalled Embryo Culture Lots and/or  
12 toxicity in the Recalled Embryo Culture Lots, such that the Recalled Embryo Culture Lots posed a  
13 fatal harm to human embryos upon their contact with human embryos, in addition to the other  
14 serious risks discussed in this Complaint.

15 59. The embryo culture media from the Recalled Embryo Culture Lots was used as  
16 intended, and it came into contact with Plaintiffs' embryos, which resulted in the tragic destruction  
17 of Plaintiffs' embryos.

18 60. The defect(s) in the culture media in the Recalled Embryo Culture Lots was a  
19 substantial factor in causing Plaintiffs' harm.

20 61. Defendants acted with a conscious disregard for the safety of consumers and/or users  
21 of its Embryo Culture Media, including Plaintiffs, because, without limitation, Defendants were  
22 aware of the dangerous consequences of not properly or adequately testing their Embryo Culture  
23 Media Lots (including specifically the Recalled Embryo Culture Lots), when they knew or should  
24 have known the culture media (specifically, the Recalled Embryo Culture Lots) did not meet the  
25 product media specifications, were not safe, and posed a serious, toxic risk to irreplaceable human  
26 embryos, and failed to recall the Recalled Embryo Culture Lots before the media came into contact  
27 with Plaintiffs' embryos.

1 **SECOND CAUSE OF ACTION**

2 **STRICT PRODUCTS LIABILITY—DESIGN DEFECT**

3 62. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
4 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

5 63. Defendants designed, manufactured, distributed, and/or sold embryo culture media,  
6 including the Recalled Embryo Culture Lots, or caused such culture media to be designed,  
7 manufactured, and/or sold.

8 64. The Recalled Embryo Culture Media Lots did not perform as safely or as effectively  
9 as an ordinary consumer would have expected it to perform when used or misused in a reasonably  
10 foreseeable manner.

11 65. Defendants had actual or constructive notice and knew, or in the exercise of  
12 reasonable care and diligence should have known, that the Recalled Embryo Culture Lots were  
13 defective in their design as discussed herein, including but not limited to their composite materials,  
14 and likely would result in the irreversible damage and destruction of Plaintiffs' embryos.

15 66. The benefits of the Recalled Embryo Culture Lots were and are not outweighed by  
16 their risks, particularly considering the potential harm resulting from their use on reproductive  
17 materials, including embryos; the likelihood of harm occurring; the feasibility of an alternative safer  
18 design at the time of manufacture; and the feasibility of more reliable testing methods and  
19 procedures.

20 67. Defendants had actual or constructive notice and knew, or in the exercise of  
21 reasonable care should have known, that the Recalled Embryo Culture Lots had significant risks,  
22 were defective in design, as discussed herein, and had an unreasonable increased risk of damage or  
23 destruction to stored reproductive materials, including embryos, in addition to the other serious  
24 risks discussed in this Complaint.

25 68. Plaintiffs were irreparably harmed because the Recalled Embryo Culture Lots were  
26 toxic and/or contained materials that were toxic when coming into contact with human embryos,  
27 eggs, and/or other genetic material, such as those belonging to Plaintiffs.



1 Defendants failed to warn consumers, including but not limited to Plaintiffs and Plaintiffs' fertility  
2 providers who purchased the culture media, that the media had not been properly and/or sufficiently  
3 tested or inspected, contained compounds and/or a combination of compounds that were toxic  
4 and/or harmful to human embryos, and/or had an increased risk of embryotoxicity or adverse  
5 growth and development, in addition to the other serious risks discussed in this Complaint..

6 77. Neither Plaintiffs nor their fertility providers knew or would have known or  
7 recognized the risks of the Recalled Embryo Culture Lots when they were used.

8 78. As a direct and proximate result of Defendants' failure to adequately warn of the  
9 dangerous and embryotoxic effects of the Recalled Embryo Culture Lots, Plaintiffs were harmed as  
10 described herein, including but not limited to the destruction of their embryos.

11 79. The lack of sufficient warnings was a substantial factor in causing Plaintiffs' harm  
12 and damages. Contaminated or harmful embryo culture media would not have been used with  
13 Plaintiffs' embryos if Defendants had provided sufficient warning(s) in advance.

14 80. Defendants acted with a conscious disregard for the safety of consumers and/or users  
15 of its Embryo Culture Media, including Plaintiffs, because, without limitation, Defendants were  
16 aware of the dangerous consequences of not properly or adequately testing or inspecting their  
17 Embryo Culture Media (including specifically the Recalled Embryo Culture Lots), when they knew  
18 or should have known the culture media (specifically, the Recalled Embryo Culture Lots) were not  
19 safe and posed a serious, toxic risk to irreplaceable human embryos, eggs, and genetic material, and  
20 failed to recall or otherwise remove from the market the Recalled Embryo Culture Lots before the  
21 media came into contact with Plaintiffs' embryos.

22 **FOURTH CAUSE OF ACTION**

23 **NEGLIGENCE**

24 81. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
25 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

26 82. Defendants designed, manufactured, distributed, and/or sold embryo culture media  
27 for use with human embryos, including the Recalled Embryo Culture Lots, or caused such media to  
28 be designed, manufactured, and/or sold.

1           83.     As a manufacturer of culture media for use with human embryos, Defendants owed  
2 duties, including but not limited to Plaintiffs, to design, manufacture, inspect, compose, and/or test  
3 its culture media, including the Recalled Embryo Culture Lots, such that their media were not toxic  
4 or hazardous when used on human embryos and/or did not contain toxic or contaminated materials  
5 and/or was not missing materials.

6           84.     Defendants breached these duties and were negligent in their design, manufacture,  
7 inspection, composition, and/or testing of their culture media, including the Recalled Embryo  
8 Culture Lots.

9           85.     As a direct and proximate result of Defendants' negligent acts and/or omissions,  
10 including but not limited to their failure to properly or adequately test their culture media (including  
11 the Recalled Embryo Culture Lots), as well as promoting and marketing their culture media as  
12 superior, effective, properly tested, and safe for use on human embryos despite their knowledge of  
13 the contamination, defective design, defective manufacture, and/or failure(s) to adequately warn of  
14 the dangerous and embryotoxic or otherwise harmful effects of the Recalled Embryo Culture Lots,  
15 Plaintiffs were harmed as described herein, including but not limited to the destruction of their  
16 embryos.

17           86.     These negligent acts and/or omissions were a substantial factor in causing Plaintiffs'  
18 harm and damages.

19           87.     Defendants acted with a conscious disregard for the safety of consumers and/or users  
20 of its Embryo Culture Media, including Plaintiffs, because, without limitation, Defendants were  
21 aware of the dangerous consequences of not properly or adequately testing or inspecting their  
22 Embryo Culture Media (including specifically the Recalled Embryo Culture Lots), when they knew  
23 or should have known the culture media (specifically, the Recalled Embryo Culture Lots) were not  
24 safe and posed a serious, toxic risk to irreplaceable human embryos, eggs, and genetic material, and  
25 failed to recall or otherwise remove from the market the Recalled Embryo Culture Lots before the  
26 media came into contact with Plaintiffs' embryos.

1 **FIFTH CAUSE OF ACTION**

2 **NEGLIGENT FAILURE TO RECALL**

3 88. Plaintiffs re-allege and incorporate by reference herein each and every allegation  
4 contained in all other paragraphs in this Complaint as though fully set forth in this cause of action.

5 89. At all times relevant herein, Defendants manufactured, distributed, and/or sold  
6 culture media for use with human embryos, including the Recalled Embryo Culture Media Lots.

7 90. As manufacturers, designers, and distributors of culture media for use with human  
8 embryos, Defendants owed duties, including but not limited to Plaintiffs, to design, manufacture,  
9 inspect, compose, and/or test their culture media, including the Recalled Embryo Culture Lots, such  
10 that their culture media was not toxic or hazardous when used on human embryos, did not contain  
11 toxic or contaminated materials, and was not missing component materials such that the media were  
12 harmful or destructive. Further, Defendants had an ongoing duty following their manufacture,  
13 distribution, and/or sale of its culture media, including the Recalled Embryo Culture Lots, to inform  
14 purchasers, consumers, and/or others who used their culture media that the media were toxic and/or  
15 hazardous and/or contained toxic or contaminated materials or composite components harmful to  
16 human embryos, and to immediately recall and/or remove such media from the market to prevent  
17 harm.

18 91. Defendants breached these duties and acted negligently by failing to recall the  
19 Recalled Embryo Culture Media Lots earlier, including before such culture medium came into  
20 contact with Plaintiffs' embryos.

21 92. For a significant period of time before it issued the recall of their Recalled Embryo  
22 Culture Lots, Defendants knew and/or should have known that, when used as intended, their  
23 Recalled Embryo Culture Media Lots were not properly or adequately composed or assembled, nor  
24 were they properly or adequately tested prior to distribution, and posed an unreasonable increased  
25 risk to embryos, in addition to the other risks noted in this Complaint.

26 93. Defendants knew, and/or reasonably should have known that the defects in their  
27 culture media, including the Recalled Embryo Culture Lots, posed a substantial risk of serious  
28 injury to the embryos in which the media came into contact with and/or was used.





- 1 3) For exemplary damages, in an amount to be determined at trial;  
2 4) For costs of suit herein;  
3 5) For pre- and post-judgement interest as allowed by law;  
4 and  
5 6) For such other and further relief as the Court may deem just and proper.

6 DATED: January 4, 2024

7 PEIFFER WOLF CARR KANE CONWAY & WISE,  
8 LLP

9  
10 By: 

11 ADAM B. WOLF  
12 MELISA A. ROSADINI-KNOTT

13 *Attorneys for Plaintiffs*

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15  
16 **DEMAND FOR JURY TRIAL**

17 Plaintiffs hereby demand a trial by jury on all claims so triable.

18 DATED: January 4, 2024

19 PEIFFER WOLF CARR KANE CONWAY & WISE,  
20 LLP

21  
22 By: 

23 ADAM B. WOLF  
24 MELISA A. ROSADINI-KNOTT

25 *Attorneys for Plaintiffs*  
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