ANEW GENERATION IS AT RISK FOR NICOTINE ADDICTION.

NATIONAL JUUL LITIGATION TEAM

After decades of educational programs convincing our youth of the dangers of nicotine use, the progress we have made toward eliminating youth tobacco use has been largely undone and has developed into a major health crisis.

Who is responsible for this drastic shift? JUUL Labs Inc. and other e-cigarette companies.

These companies are fueled by their own greed and have put profits over the safety of our youth. Kids across the country are suffering from vaping related lung injuries.



NATIONAL JUUL LITIGATION TEAM

his consortium was formed to work jointly on behalf of public entities in the investigation and prosecution of claims for damages arising out of the negligence, public nuisance and other claims against JUUL Labs, Inc.

We are leaders in representing public entities in this type of litigation against companies like JUUL. The law firms in the National JUUL Consortium collectively represent over 100 school districts and public entities that serve over 6 million students. Our Consortium has filed cases against JUUL across the country and is representing clients in at least ten states.

All of the firms in our legal team are nationally recognized firms that have built a reputation on their ability and willingness to litigate complex disputes against some of the world's largest companies. Large cases and powerful defendants are nothing new to us. We

have fought and won cases against giants such as BP, Bayer, Volkswagen, and Pacific Gas & Electric to name just a few.

We are committed to representing public entities, large or small, across the country. We will ensure they are justly compensated for the public health crisis and costs imposed on them by irresponsible companies like JUUL. Members of our consortium currently serve in leadership roles, including as Public Entity Plaintiffs' Co-Lead Counsel representing school districts throughout California, in litigation against JUUL Labs, Inc.

Together, our team is working with lawyers representing school districts from across the nation as they seek to hold the e-cigarette manufacturer accountable for creating a youth vaping epidemic among school campuses.











Wagstaff & Cartmell

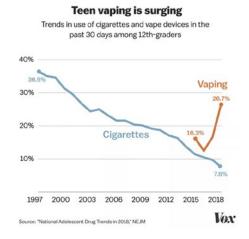




WHAT IS THE PROBLEM?

or decades we have been working to educate our youth about the dangers and health risks associated with smoking. As a result, we saw a significant decline in youth smoking rates from 28 % in 2000 to 7.6% in 2017. Years of litigation, regulation, and education led to this great success. However, one company is working to undo it all.

The inventors of the JUUL e-cigarette made it their goal to re-invent the



cigarette so it was socially acceptable again. JUUL hit the market in 2015 and since then teen vaping has surged into an epidemic.

JUUL controls over 70% of the e-cigarette market which it achieved by building a new consumer base by attracting youth consumers on social media and rolling out a marketing

A recent study found that 63% of adolescent JUUL users did not know that JUULpods contain nicotine.

campaign that portrayed vaping as trendsetting and stylish. Social media posts featured celebrities using JUUL products and social media influencers singing its praises.

While JUUL normalized smoking through its campaigns, the company also downplayed the health risks. To addict a new generation, JUUL created flavored products and added organic acids to its formula that would reduce the harshness of the nicotine.

Keeping its target on youth consumers, JUUL designed a tech-savvy product that looked like a USB drive and could be easily concealed. The device has secret features that can be unlocked, such as making the indicator light flash different colors in "party mode." JUUL wasn't just pushing a product. It was creating a culture among youth so much so that the term "juuling" is regularly used among teens.

DESIGNED TO BE ADDICTIVE

Jule not only designed a sleek product to appeal to juveniles, but they manufactured a product that was more addictive than regular cigarettes. Jule uses its own patented nicotine salts to make liquid nicotine cartridges, or Julepods. According to Jule, each Julepod is the equivalent of a pack of cigarettes.

Consuming 2 JUULpods in a day is the equivalent of consuming 2 to 4 packs of cigarettes a day.

The company also used benzoic acid and manipulated the pH of its patented nicotine salts to make the nicotine more palatable and reduce the "throat hit" users experience when juuling. By minimizing the harshness of the nicotine, users can vape more frequently and for longer periods of time.

The JUUL device creates serious health consequences as the user receives increased nicotine exposure by enabling extreme levels of unfettered use. Nicotine is a highly addictive, psychoactive substance that affects the areas of the brain that are responsible for emotional and cognitive processing. This is particularly concerning for adolescent users who may experience lasting consequences to their brain maturation, cognitive ability, and mental health. Studies have shown that teens exposed to nicotine are more likely to be dependent on nicotine and other substances later in life.

THE EFFECT ON SCHOOL DISTRICTS

JUUL has invaded school districts across the nation and placed severe burdens on school administrators as they work to find ways to educate students on the dangers of vaping and keep it out of their campuses.

School administrators find it difficult to enforce discipline policies related to vaping because of the discreet use of the product. Many schools have diverted educational resources to crackdown on vaping enforcement.

Administrators have students roll up their sleeves to check for JUUL devices.

perform random nicotine tests, installed vape detectors in school bathrooms, and assigned teachers for bathroom surveillance. In some cases, schools have had to remove bathroom doors or even shut down bathrooms-or known to students as "the JUUL room."

Several school districts have joined together and filed lawsuits against JUUL for their role in fueling the e-cigarette epidemic that has invaded schools and diminished the learning environment across their Districts.

School districts have limited funds and they should not have to allocate money from their budgets for educational campaigns, prevention, and treatment for student vaping. Schools are having to divert critical funds away from learning programs for struggling students to vaping outreach programs and enforcement efforts, such as vape

A national survey of middle schools and high schools found that 43.3% of schools have had to implement not only an e-cigarette policy but a JUUL-specific policy.

detector devices and video surveillance.

Vaping has also caused many students to have health issues, which results in an increased number of absences. This increase in student absences means there has been a reduction in district state funding. The law allows school districts to hold companies like JUUL responsible for the damage they cause to society.



THE LAWSUITS

JULL can be held responsible for past and future expenses for school districts dealing with the surge in e-cigarette use on campus.

The lawsuits filed against JUUL seek injunctive relief and an abatement remedy to combat the e-cigarette epidemic, which has severely interfered with normal school operations. The districts are also seeking compensatory damages to provide relief from the districts' financial losses as a result of



students being absent from school and the costs of arranging outreach and education programs regarding the risk of vaping.

School districts do not have to pay anything upfront. The law firms handling the cases will front the expenses in the litigation. The school districts would only be required to pay expenses if the law firms obtain recovery on the school districts' behalf. If the action is not successful, no legal fees are owed.

Many districts across the nation are struggling to protect their students from the health hazards of vaping and JUUL must be held accountable for creating this widespread burden. Studies have found that the 2018 spike in nicotine vaping was the largest for any substance recorded in 44 years.

FEDERAL JUDGE VALIDATES DISTRICT CLAIMS

JUUL Labs Inc. and other key defendants in the litigation filed motions seeking to dismiss claims filed by school districts, asserting that school district claims related to JUUL were not legally viable.

However, the federal judge overseeing the national JUUL litigation recently ruled that public nuisance and negligence claims filed by school districts and other government entities against JUUL Labs, Inc. and other key defendants are legally valid claims and may proceed.

According to the Court, school districts and other government entity plaintiffs "sufficiently allege that JLI substantially interfered with public health, impacting their school districts and communities."

The Court stated the school districts plausibly "allege damages as a result of an ongoing and persistent deceptive marketing campaign and intentional targeting of youth that led to expenses that municipalities and school boards could not have reasonably anticipated to incur.

JLI's misconduct allegedly forced school districts to devote and divert resources to address the youth e-cigarette crisis and incur costs related to counseling, training, educating, or disciplining students, as well as increased costs for

"Vaping is an epidemic and, as community leaders, we're taking the lead to protect our students and future leaders.

The hidden dangers of vaping are triggering a health crisis and we're taking action."

Shannon Wickliffe

Olathe school board president Shannon Wickliffe

physical modifications to schools and disposing of hazardous waste."

Furthermore, the Court explained: "The government entity complaints include plausible allegations that JLI had control over the conduct that created and maintained the youth e-cigarette crisis, such as directly and intentionally marketing to youth, distributing free samples to young audiences, presenting misleading information to students in schools, and preserving the availability of the popular mint flavor while ostensibly removing "kid-friendly" flavors from the market. These allegations match the type of public nuisance allegations that have proceeded past the pleadings stage in cases addressing opioids and firearms."

OUR LEGAL TEAM

With more than 40 years of experience, Baron & Budd has the expertise and resources to handle complex litigation throughout the United States. As a law firm that takes pride in remaining at the forefront of litigation, Baron & Budd has spearheaded many significant cases for hundreds of entities and thousands of individuals. Baron & Budd has been repeatedly selected by The Legal 500 as one of the country's premier law firms in mass tort claims and class action litigation. Since the firm was founded in 1977, Baron & Budd has achieved substantial national acclaim for its work on cutting-edge

litigation, trying hundreds of cases to verdict and settling tens of thousands of cases in areas of litigation as diverse and significant as dangerous and highly addictive pharmaceuticals, defective medical devices, asbestos and mesothelioma, California wildfires and environmental contamination, fraudulent banking practices, e-cigarettes, motor vehicles, federal whistleblower cases, and other consumer fraud issues.





John Fiske

Torri Sherlin



In 1979, Jere Locke Beasley founded the firm, which is now known as Beasley, Allen,

Crow, Methvin, Portis & Miles, P.C. Our primary offices are based in Atlanta, Georgia, and Montgomery, Alabama, although we work with attorneys and clients throughout the country. The firm employs more than 285 people, including more than 80 attorneys. Beasley Allen is leading the charge to

hold JUUL Labs, Inc. accountable for the damage it has done to youth and schools around the country. Beasley Allen lawyers hold key leadership positions in both federal and state court consolidated litigations against JUUL.



Joseph VanZandt



Andy Birchfield

gozahonnold Kirk is a Fellow in the American College

of Trial Lawyers, a member of the American Board of Trial Advocates and fellow in the International Academy of Trial Lawyers. Brad has served in numerous leadership positions on a number of successful MDLs. Judge Orrick has appointed Brad to the Plaintiff's Steering Committee of the JUUL MDL. Kirk and Brad were

extensively involved in the JUUL litigation from the outset. They have spoken frequently on the hazards of JUUL and the dangers of adolescent nicotine addiction.





Kirk Goza

Bradley Honnold

PANISH SHEA & BOYLE

Dedicated to obtaining justice for our clients, firm attorneys have obtained some

of the most significant verdicts and settlements for plaintiffs in U.S. history, often taking on large corporations and government entities whose negligence causes our clients' injuries, and holds them accountable. With this mission at the heart of its work, Panish Shea & Boyle LLP and its attorneys are repeatedly recognized for excellence by other trial attorneys, legal organizations and publications nationwide. Named 2020 Elite Trial Lawyers 'Personal Injury Law Firm of the Year', the firm is ranked by U.S. News & World Report and Best Lawyers® as a "Tier 1" Firm - the highest ranking a firm can receive - in the areas of Plaintiffs Personal Injury Litigation, Plaintiffs Product Liability Litigation, and Plaintiffs Mass Tort Litigation/Class Actions.



Brian Panish



Rahul Ravipudi

OUR LEGAL TEAM

ਪ੍ਰੋ∕ਪ੍ਰਾਂ Wagstaff & Cartmell Founded in 1997 when Tom Wagstaff and Tom Cartmell left a large

Kansas City firm to form a boutique, the original vision of Wagstaff and Cartmell was to be a premier trial firm representing both plaintiffs and defendants in complex cases.

Now with 36 attorneys and over 40 supporting staff members, the Firm's lawyers appear in cases nationwide, including in multi-district litigation, class actions, and mass tort cases. The Firm has lawyers licensed in California, Missouri, Kansas, Colorado, Utah, the District of Columbia, and in numerous

federal district and appellate courts, including the U.S. Supreme Court.

Wagstaff & Cartmell attorneys have frequently been appointed to senior leadership positions in national multi-district litigation, state court consolidations, and class actions. In multi-district litigation against JUUL Labs, Inc., the firm represents dozens of school districts in numerous states across the nation.





Tom Cartmell

Jon Kieffer



For six decades, members of the firm have successfully represented injured clients

in a multitude of ways because of individual and corporate carelessness.

Our attorneys have been repeatedly honored locally and nationally, and serve as faculty members at Berkeley Law, UC Hastings, and the University of

San Francisco. Established in 1959, the firm remains unique in its size, diversity of practice and track record.



Connor Kelly



Khaldoun Baghdadi

We are leaders in representing public entities in this type of litigation against big companies like JUUL.

We currently represent school districts all across the country, including Los Angeles Unified School District which is the second largest school district in the nation.

