

United States District Court for the District of Columbia

Novartis Pharmaceuticals Corporation,

One Health Plaza East  
Hanover, NJ 07936

Plaintiff,

v.

The Janssen Pharmaceuticals Company of  
Johnson & Johnson,

One Johnson & Johnson Plaza  
News Brunswick, NJ 08933

Defendant.

Case: 1:19-cv-00576 (D Deck)

Assigned To : Bates, John D.

Assign. Date : 3/1/2019

Description: TRO/PI Jury Demand

JURY TRIAL DEMANDED

**COMPLAINT FOR INJUNCTIVE AND OTHER RELIEF**

Plaintiff Novartis Pharmaceuticals Corporation (“Novartis”), by and through its attorneys, files this Complaint against The Janssen Pharmaceuticals Companies of Johnson & Johnson (“Janssen”). In support of its causes of action, Novartis states as follows:

**NATURE OF THE ACTION**

1. Novartis seeks to enjoin Janssen’s false and misleading advertising claims first launched in January 2019, and to obtain monetary and other relief for damages incurred, under the false advertising of the Lanham Act, 15 U.S.C. §§ 1125(a).
2. Novartis and Janssen manufacture competing drugs, Cosentyx® and Tremfya®, respectively, to treat moderate to severe plaque psoriasis.
3. Janssen presented data from the ECLIPSE study in a false and misleading manner in at least two presentations at conferences within the past two months and is continuing to do so *right now*. In these presentations, Janssen made claims that its Tremfya® product was both superior and noninferior

to Novartis's Cosentyx® product, but did not present key safety information. Rather, it chose to cherry-pick among the adverse events that were recorded in the study.

4. Psoriasis is a chronic, autoimmune inflammatory disorder that results in the overproduction of skin cells, characterized by raised, inflamed, red lesions, or plaques, which can cause physical pain and itching.<sup>1</sup>

5. Novartis and Janssen manufacture competing drugs, Cosentyx® and Tremfya®, respectively, to treat moderate to severe plaque psoriasis.

6. On December 12, 2018, Janssen announced its results from a study it conducted to compare the efficacy of these products. Termed the ECLIPSE study, it was designed to compare the efficacy of Tremfya® versus Cosentyx® after 48 weeks of treatment in adults with moderate to severe plaque psoriasis.

7. As part of this study, investigators collect safety information. This information is published as part of the study results.

8. The difference in how the adverse events from the ECLIPSE study were portrayed in marketing material versus the poster that presented the scientific results is striking, as shown below:

**Figure 1: Janssen's marketing material on ECLIPSE safety findings**

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<sup>1</sup> American Academy of Dermatology, *What is Psoriasis?* (Nov. 19, 2018) <https://www.aad.org/public/diseases/scaly-skin/psoriasis/what-is-psoriasis>.

IN MODERATE TO SEVERE PLAQUE PSORIASIS

**SAFETY PROFILE FROM THE ECLIPSE STUDY****ECLIPSE: SUMMARY OF SAFETY FINDINGS THROUGH WEEK 56<sup>1</sup>**

	<b>TREMFYA<sup>®</sup></b> (guselkumab)	<b>COSENTYX<sup>®</sup></b> (secukinumab)
<b>ADVERSE EVENT RATES THROUGH WEEK 56</b>		
SAFETY ANALYSIS SET, n	<b>534</b>	<b>511</b>
AVERAGE DURATION OF FOLLOW-UP (WEEKS)	<b>54.90</b>	<b>53.67</b>
≥1 ADVERSE EVENT, n (%)	<b>416 (77.9%)</b>	<b>417 (81.6%)</b>
≥1 SERIOUS ADVERSE EVENT, n (%)	<b>33 (6.2%)</b>	<b>37 (7.2%)</b>
<b>SELECTED ADVERSE EVENTS*</b>		
INFECTIONS, n (%)	<b>313 (58.6%)</b>	<b>331 (64.8%)</b>
SERIOUS INFECTIONS, n (%)	<b>6 (1.1%)</b>	<b>5 (1.0%)</b>
TUBERCULOSIS	<b>0</b>	<b>0</b>
INFLAMMATORY BOWEL DISEASE, n (%) <sup>†</sup>	<b>0</b>	<b>3 (0.6%)</b>
SERIOUS HYPERSENSITIVITY REACTIONS, n (%) <sup>‡</sup>	<b>0</b>	<b>1 (0.2%)<sup>§</sup></b>

No safety comparisons can be made between TREMFYA<sup>®</sup> and Cosentyx<sup>®</sup> based upon this presentation.

\*Selected adverse events represent events included in Warnings and Precautions section of the current full Prescribing Information for each product.

<sup>†</sup>Inflammatory bowel disease includes Crohn's disease, colitis, or inflammatory bowel disease. Of these 3 treatment-emergent adverse events, there was 1 serious adverse event of Crohn's disease.

<sup>‡</sup>Anaphylactic reactions include adverse events of anaphylactic reaction, anaphylactic shock, anaphylactoid reaction, anaphylactoid shock, and Type 1 hypersensitivity. Serum sickness-like reactions include adverse events of serum sickness and serum sickness-like reaction.

<sup>§</sup>Anaphylactoid reaction to wasp bite.

**SELECTED IMPORTANT SAFETY INFORMATION**

TREMFYA<sup>®</sup> may increase the risk of infection. Instruct patients to seek medical advice if signs or symptoms of clinically important chronic or acute infection occur. If a clinically important or serious infection develops, discontinue TREMFYA<sup>®</sup> until infection resolves. Evaluate for tuberculosis before treating with TREMFYA<sup>®</sup>. Avoid use of live vaccines in patients treated with TREMFYA<sup>®</sup>.

Please see related and other Important Safety Information on back cover.





11. Ignoring these prohibitions, Janssen's illegal false advertising is causing, and will continue to cause, massive and irreparable harm to Novartis.

12. Novartis has sent Janssen three separate cease and desist letters in hopes of amicably – and without court intervention – solving this and associated problems in its use of ECLIPSE study data, to no avail.

13. **Right now**, Janssen is continuing this misleading advertising campaign at the world's largest dermatology event: the Annual Meeting of the American Academy of Dermatology at the Walter E. Washington Convention Center here in the District of Columbia. Over 19,000 attendees and industry professionals, including 10,000 dermatologists, will be potentially exposed to Janssen's false advertising campaign.

14. Novartis therefore respectfully seeks an immediate halt to Janssen's continued false and misleading advertising claims. Janssen's false advertising campaign where they selectively omit key safety information from their marketing materials should be enjoined.

#### **JURISDICTION AND VENUE**

15. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 and 1338 because it arises under the Lanham Act, 15 U.S.C. § 1051 *et seq.* This Court has supplemental jurisdiction over Novartis's state-law claim pursuant to 28 U.S.C. § 1367(a) because they are related to Novartis's Lanham Act claim and they form part of the case or controversy.

16. This Court has personal jurisdiction over Janssen pursuant to D.C. Code § 13-423(A)(1),(3), and (4) and the Due Process Clause of the United States Constitution. Janssen transacts business in this district, including without limitation, by selling and marketing its products to residents of the District of Columbia, and by disseminating its misleading advertising that reached viewers in District of Columbia. Janssen also has committed tortious acts within this district by making advertisements and other material misrepresentations of fact to residents of the District of Columbia.

17. Venue is proper in this Court under 28 U.S.C. § 1391 because a substantial part of the events giving rise to Novartis's claim occurred in District of Columbia.

**THE PARTIES**

18. Plaintiff Novartis Pharmaceuticals Corporation a pharmaceutical company headquartered at One Health Plaza East Hanover, NJ 07936.

19. Defendant Janssen Pharmaceutical is a pharmaceutical company headquartered in Titusville, New Jersey.

**FIRST CAUSE OF ACTION FOR FALSE ADVERTISING**

**(Lanham Act Violation, 15 U.S.C. § 1125(a))**

20. Novartis repeats and realleges each and every allegation contained in paragraphs 1 through 16 as if fully set forth herein.

21. Janssen sells Tremfya® in interstate commerce and is engaging in an advertising Campaign in connection with the marketing of this product.

22. The crux of Janssen's Campaign is that the ECLIPSE study proves that Tremfya® is superior to Cosentyx® but fails to present critical safety information.

23. Janssen's claims made in several industry presentations are false and misleading.

24. These claims represent commercial speech, in that they were made by a party (Janssen) that is in commercial competition with Novartis for the purpose of influencing health care providers to prescribe its product, Tremfya®, and were disseminated sufficiently to the public to constitute "advertising" or "promotion" within this industry.

25. Upon information and belief, Janssen's claims are likely to deceive or confuse a substantial segment of the target audience prescribers.

26. This deceptive conduct by Janssen is and has been willful and deliberate, and has injured and continues to injure Novartis.

27. Janssen knows or should know that the claims it is making regarding Novartis's drug, Cosentyx®, are false and misleading.

28. Janssen advertising violates Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a).

29. Novartis has been and continues to be damaged by Janssen's false advertising, including through direct diversion of sales from Novartis to Janssen and the lessening of the goodwill that Novartis's drug, Cosentyx®, enjoys among health care providers and other audiences.

30. Novartis has no adequate remedy at law to redress these harms.

## **SECOND CAUSE OF ACTION**

### **(Unfair or deceptive trade practices, § 28-3904(e),(f))**

31. Novartis repeats and realleges each and every allegation contained in paragraphs 1 through 27 as if fully set forth herein.

32. Janssen's advertising claims represent that its drug, Tremfya® is superior to Cosentyx® without presenting the key safety information.

33. Janssen's advertising claims are based on the data from the ECLIPSE study.

34. Janssen's failure to accurately present safety information from the ECLIPSE study misrepresents the safety of its product on new safety information that has not been previously available.

35. Janssen's advertising claims omit a critical, material fact about the data from the ECLIPSE study, and the omission tends to mislead.

36. Janssen advertising violates §28-3904 D.C. Unfair Or Deceptive Trade Practices Act.

## **PRAYER FOR RELIEF**

WHEREFORE, Novartis respectfully requests that the Court enter judgment as follows:

A. An Order adjudging that Janssen has violated and is violating Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a) and (c);

B. An Order preliminarily and permanently enjoining Janssen from disseminating or causing the dissemination of the false and misleading claims alleged herein;

C. An Order preliminarily and permanently enjoining Janssen from disseminating or causing the dissemination of any and all other advertisements, packaging, or other promotional materials making

this and comparable claims, whether expressly or by implication, based on selectively presented safety data regarding Tremfya® and Cosentyx® derived from the ECLIPSE study;

D. An Order permanently enjoining Janssen, including without limitation its employees, investigators, and researchers, from making any of the advertising claims challenged as false or misleading in this Complaint in any speaking engagements;

E. An Order permanently enjoining Janssen from making any of the advertising claims challenged as false or misleading in this Complaint in any commercials, advertisements, or other promotional materials;

F. An Order requiring Janssen to disseminate corrective advertising to correct the false and misleading impressions created among prescribers by the false claims contained in the various presentations;

G. An Order directing an accounting by Janssen of their gains, profits, savings, and advantages realized by reason of its false advertising, awarding Novartis damages to the fullest extent allowed by law, and trebling Novartis's recovery pursuant to Section 35 of the Lanham Act, 15 U.S.C. §1117;

H. An Order granting Novartis its costs and disbursements in this action, including its reasonable attorneys' fees; and

I. An Order granting Novartis such other and further relief as this Court may deem just and proper.

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Novartis demands trial by jury in this action of all issues so triable.

March 1, 2019

By:



Keith J. Harrison (DC Bar #416755)  
Scott L. Winkelman (DC Bar #416747)  
Cheryl Falvey (DC Bar #414277)



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Email: [kharrison@crowell.com](mailto:kharrison@crowell.com)

CIVIL COVER SHEET

JS-44 (Rev. 6/17 DC)

<b>I. (a) PLAINTIFFS</b> Novartis Pharmaceutical Corp One Health Plaza East Hanover N. J. 07936 (b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF (EXCEPT IN U.S. PLAINTIFF CASES)	<b>DEFENDANTS</b> The Janssen Pharmaceutical Company of Johnson & Johnson One Johnson & Johnson Plaza New Brunswick, N. J. 08933 COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT
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<b>(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)</b> Scott Winkelmay 1001 Penn. Ave. NW Washington, D.C. 20004	<b>A Case: 1:19-cv-00576 (D Deck)</b> <b>Assigned To : Bates, John D.</b> <b>Assign. Date : 3/1/2019</b> <b>Description: TRO/PI Jury Demand</b>
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<b>II. BASIS OF JURISDICTION</b> (PLACE AN X IN ONE BOX ONLY)  <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (PLACE AN X IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT) <b>FOR DIVERSITY CASES ONLY!</b> <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>PTF</th> <th>DFT</th> <th></th> <th>PTF</th> <th>DFT</th> </tr> </thead> <tbody> <tr> <td>Citizen of this State</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </tbody> </table>		PTF	DFT		PTF	DFT	Citizen of this State	<input type="checkbox"/>	<input type="checkbox"/>	Incorporated or Principal Place of Business in This State	<input type="checkbox"/>	<input type="checkbox"/>	Citizen of Another State	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Incorporated and Principal Place of Business in Another State	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>
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Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>																				

**IV. CASE ASSIGNMENT AND NATURE OF SUIT**

(Place an X in one category, A-N, that best represents your Cause of Action and one in a corresponding Nature of Suit)

<input type="radio"/> <b>A. Antitrust</b>  <input type="checkbox"/> 410 Antitrust	<input type="radio"/> <b>B. Personal Injury/Malpractice</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Medical Malpractice <input type="checkbox"/> 365 Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Product Liability	<input type="radio"/> <b>C. Administrative Agency Review</b>  <input type="checkbox"/> 151 Medicare Act  <b>Social Security</b> <input type="checkbox"/> 861 HIA (1395f) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>Other Statutes</b> <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 890 Other Statutory Actions (If Administrative Agency is Involved)	<input checked="" type="radio"/> <b>D. Temporary Restraining Order/Preliminary Injunction</b>  Any nature of suit from any category may be selected for this category of case assignment.  *(If Antitrust, then A governs)*
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<input type="radio"/> <b>E. General Civil (Other)</b>		OR	<input type="radio"/> <b>F. Pro Se General Civil</b>	
<b>Real Property</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent, Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property  <b>Personal Property</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<b>Bankruptcy</b> <input type="checkbox"/> 422 Appeal 27 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>Prisoner Petitions</b> <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Conditions <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement  <b>Property Rights</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark	<b>Federal Tax Suits</b> <input type="checkbox"/> 870 Taxes (US plaintiff or defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609  <b>Forfeiture/Penalty</b> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other  <b>Other Statutes</b> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 430 Banks & Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Organization <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Satellite TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes <input checked="" type="checkbox"/> 890 Other Statutory Actions (if not administrative agency review or Privacy Act)	

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<input type="radio"/> <b>G. Habeas Corpus/ 2255</b>  <input type="checkbox"/> 530 Habeas Corpus – General <input type="checkbox"/> 510 Motion/Vacate Sentence <input type="checkbox"/> 463 Habeas Corpus – Alien Detainee	<input type="radio"/> <b>H. Employment Discrimination</b>  <input type="checkbox"/> 442 Civil Rights – Employment (criteria: race, gender/sex, national origin, discrimination, disability, age, religion, retaliation)  *(If pro se, select this deck)*	<input type="radio"/> <b>I. FOIA/Privacy Act</b>  <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 890 Other Statutory Actions (If Privacy Act)  *(If pro se, select this deck)*	<input type="radio"/> <b>J. Student Loan</b>  <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (excluding veterans)
<input type="radio"/> <b>K. Labor/ERISA (non-employment)</b>  <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Labor Railway Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="radio"/> <b>L. Other Civil Rights (non-employment)</b>  <input type="checkbox"/> 441 Voting (if not Voting Rights Act) <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 445 Americans w/Disabilities – Employment <input type="checkbox"/> 446 Americans w/Disabilities – Other <input type="checkbox"/> 448 Education	<input type="radio"/> <b>M. Contract</b>  <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholder's Suits <input type="checkbox"/> 190 Other Contracts <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="radio"/> <b>N. Three-Judge Court</b>  <input type="checkbox"/> 441 Civil Rights – Voting (if Voting Rights Act)

**V. ORIGIN**  
 1 Original Proceeding  
  2 Removed from State Court  
  3 Remanded from Appellate Court  
  4 Reinstated or Reopened  
  5 Transferred from another district (specify)  
  6 Multi-district Litigation  
  7 Appeal to District Judge from Mag. Judge  
  8 Multi-district Litigation – Direct File

**VI. CAUSE OF ACTION (CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE A BRIEF STATEMENT OF CAUSE.)**  
*Labham Act U.S.C. § 1125 (a)*

<b>VII. REQUESTED IN COMPLAINT</b>	CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 <input type="checkbox"/>	DEMAND \$ _____	JURY DEMAND: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
<b>VIII. RELATED CASE(S) IF ANY</b>	(See instruction)	YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	If yes, please complete related case form

DATE: <u>3/1/19</u>	SIGNATURE OF ATTORNEY OF RECORD:
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**INSTRUCTIONS FOR COMPLETING CIVIL COVER SHEET JS-44**  
 Authority for Civil Cover Sheet

The JS-44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and services of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. Listed below are tips for completing the civil cover sheet. These tips coincide with the Roman Numerals on the cover sheet.

- I. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF/DEFENDANT (b) County of residence: Use 11001 to indicate plaintiff if resident of Washington, DC, 88888 if plaintiff is resident of United States but not Washington, DC, and 99999 if plaintiff is outside the United States
- III. CITIZENSHIP OF PRINCIPAL PARTIES: This section is completed only if diversity of citizenship was selected as the Basis of Jurisdiction under Section II.
- IV. CASE ASSIGNMENT AND NATURE OF SUIT: The assignment of a judge to your case will depend on the category you select that best represents the primary cause of action found in your complaint. You may select only one category. You must also select one corresponding nature of suit found under the category of the case.
- VI. CAUSE OF ACTION: Cite the U.S. Civil Statute under which you are filing and write a brief statement of the primary cause.
- VIII. RELATED CASE(S), IF ANY: If you indicated that there is a related case, you must complete a related case form, which may be obtained from the Clerk's Office.

Because of the need for accurate and complete information, you should ensure the accuracy of the information provided prior to signing the form.