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**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,	)
	)
	)
Plaintiff,	)
	)
v.	)
	)
ARNET REALTY COMPANY L.L.C.,	)
OLD BRIDGE MINERALS, INC., AND HB	)
WAREHOUSING, LLC,	)
	)
Defendants.	)
	)

COMPLAINT

The United States of America, by authority of the Attorney General of the
United States and through the undersigned attorney, acting at the request of the

Regional Administrator of the United States Environmental Protection Agency (“EPA”) for Region II, files this complaint and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action brought under Sections 106 and 107 of the Comprehensive Environmental Response, Compensation, and Liability Act, as amended, 42 U.S.C. §§ 9606 & 9607 (“CERCLA”).

2. The United States seeks: (a) reimbursement of costs incurred by EPA in response to releases and threatened releases of hazardous substances into the environment at or from the First Operable Unit “OU1” (groundwater contamination) and Third Operable Unit (“OU3”) (soils contamination) of the CPS/Madison Superfund Site (“Site”), located in Old Bridge Township, New Jersey; (b) performance by Defendants Arnet Realty Company L.L.C. (“Arnet Realty”), Old Bridge Minerals, Inc. (“Old Bridge Minerals”), and HB Warehousing, LLC (“HB Warehousing”) of the part of the response action that addresses metals contamination for OU1 and the entire response action for OU3 consistent with the National Contingency Plan, 40 C.F.R part 300; and (c) a declaratory judgment that Defendants will be liable for any further response costs that the United States may incur as a result of a release or threatened release of hazardous substances into the environment at or from metals contamination in OU1 and OU3.

JURISDICTION AND VENUE

3. This Court has jurisdiction over the subject matter of this action and over the parties under 28 U.S.C. §§ 1331 and 1345 and Sections 106, 107, and 113(b) of CERCLA, 42 U.S.C. §§ 9606, 9607 & 9613(b).

4. Venue is proper in this judicial district under 28 U.S.C. § 1391(b)(2) and Sections 106(a) and 113(b) of CERCLA, 42 U.S.C. §§ 9606(a) & 9613(b), because the releases or threatened releases of hazardous substances that gave rise to this claim occurred in this district, and because the Site is located in this district.

THE DEFENDANTS

5. Defendants Arnet Realty, Old Bridge Minerals, and HB Warehousing are affiliated companies.

6. In 2023, Old Bridge Chemicals, Inc. (“Old Bridge Chemicals”) changed its name to Old Bridge Minerals, and Madison Industries, Inc. was reorganized and consolidated into Old Bridge Minerals.

7. Defendant Old Bridge Minerals, including through its corporate predecessors (Old Bridge Chemicals and Madison Industries, Inc.), operated a facility on property within the Site currently owned by Defendant Arnet Realty.

8. Defendant HB Warehousing currently owns a portion of the Site.

9. Each of the Defendants is a “person” as defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

STATUTORY BACKGROUND

10. CERCLA was enacted in 1980 to provide a comprehensive governmental mechanism for abating releases and threatened releases of hazardous substances and other pollutants and contaminants, and for funding the costs of such abatement and related enforcement activities, which are known as “response” actions, 42 U.S.C. §§ 9604(a) & 9601(25).

11. Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1), provides:

Whenever (A) any hazardous substance is released or there is a substantial threat of such a release into the environment, or (B) there is a release or substantial threat of release into the environment of any pollutant or contaminant which may present an imminent and substantial danger to the public health or welfare, the President is authorized to act, consistent with the national contingency plan, to remove or arrange for the removal of, and provide for remedial action relating to such hazardous substance, pollutant, or contaminant at any time (including its removal from any contaminated natural resource), or take any other response measure consistent with the national contingency plan which the President deems necessary to protect the public health or welfare or the environment.

12. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides in pertinent part:

Notwithstanding any other provision or rule of law, and subject only to the defenses set forth in subsection (b) of this Section –

- (1) The owner and operator of a vessel or a facility,
- (2) Any person who at the time of disposal of any hazardous substance owned or operated any facility at which such hazardous substances were disposed of,

...

shall be liable for—

- (A) all costs of removal or remedial action incurred by the United States Government . . . not inconsistent with the national contingency plan....

13. For CERCLA response actions and enforcement purposes, the Administrator of EPA is the President's delegate, as provided in operative Executive Orders, and, within certain limits, the Regional Administrators of EPA have been re-delegated this authority. In EPA Region 2, this authority has been further delegated to the Director of the Superfund and Emergency Management Division.

14. Under Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), the United States is also authorized to seek injunctive relief necessary to abate the imminent and substantial endangerment to the public health or welfare, or the environment, that may result from an actual or threatened release of hazardous substance at or from a facility.

15. Under Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2), in any action under CERCLA Section 107, the court shall enter a declaratory judgment on liability for response costs that will be binding on any subsequent action or actions to recover further response costs.

GENERAL ALLEGATIONS

16. The Site consists of approximately 35 acres, located at 554 Waterworks Road in Old Bridge Township, Middlesex County, New Jersey.

17. The Site is comprised of two adjacent parcels, one owned by the BASF Corporation (“BASF”) and the other owned by Arnet Realty and HB Warehousing. The parcel owned by Arnet Realty and HB Warehousing includes the operation sites of Old Bridge Minerals and its corporate predecessors, Madison Industries and Old Bridge Chemicals.

18. Madison Industries, corporate predecessor to Old Bridge Minerals, began operations in 1967 and produced inorganic chemicals, primarily zinc salts that are used in fertilizers, pharmaceuticals, and food additives.

19. Old Bridge Minerals produces copper chemicals and zinc sulfate.

20. To manage cleanup operations at the Site, EPA has divided response actions for the Site into portions referred to as “Operable Units.” OU1 consists of groundwater that has been contaminated from source areas containing volatile organic compounds from the operations of BASF and source areas contaminated with metals from the Old Bridge Minerals, including their corporate predecessors. OU2 consists of contaminated soils on the BASF parcel. OU3 consists of contaminated soils on the parcel currently owned by Arnet Realty and HB Warehousing.

21. The Site was added to the National Priorities List on September 8, 1984. 48 Fed. Reg. 40658 (1983).

22. Beginning in 1991, under the direction of the New Jersey Department of Environmental Protection (“NJDEP”), Defendants, including through their corporate predecessor Madison Industries, installed three groundwater recovery wells downgradient of their property, to intercept groundwater contaminated by metals entering the Runyon Watershed.

23. When the groundwater surrounding these recovery wells achieved the clean-up goals in place at the time, the recovery wells were shut down and replaced by the pump and treatment system wells on Defendants’ parcels which, together with the three wells operated by BASF to address volatile organic compounds, are known as the Interim Remedial Measure (“IRM”) wells.

24. Under NJDEP oversight, Defendants, including their corporate predecessors, initiated a Performance Monitoring Program (“PMP”) to evaluate the effectiveness of the Madison Industries pump and treatment system. Pursuant to the PMP, Defendants continue to operate and maintain the IRM wells on their property under NJDEP oversight.

25. In response to a release or a substantial threat of a release of hazardous substances at or from the Site, BASF completed a Remedial

Investigation for OU1 and OU2 of the Site on July 10, 2015, and a Feasibility Study for the Site on November 1, 2018, in accordance with 40 C.F.R. § 300.430.

26. In response to a release or a substantial threat of a release of hazardous substances at or from the Site, Defendants completed a Remedial Investigation and Feasibility Study for OU3 of the Site on May 12, 2023, in accordance with 40 C.F.R. § 300.430.

27. On September 30, 2019, EPA selected the remedial action to be implemented at OU1 and OU2 of the Site, which is embodied in a final Record of Decision (“OU1/OU2 Record of Decision”).

28. On September 26, 2023, EPA selected a remedial action to be implemented at OU3 of the Site, which is embodied in a final Record of Decision (“OU3 Record of Decision”).

FIRST CLAIM FOR RELIEF

Cost Recovery Under CERCLA Section 107

29. The above paragraphs are re-alleged and incorporated herein by reference.

30. Defendants Old Bridge Minerals, Arnet Realty, and HB Warehousing are each liable under Section 107(a)(1) of CERCLA, 42 U.S.C. § 9607(a)(1), as a person who owns or operates a facility, or as a successor in interest.

31. Defendants Old Bridge Minerals and Arnet Realty are each liable under Section 107(a)(2) of CERCLA, 42 U.S.C. § 9607(a)(2), as a person who

owned or operated the facility at the time that hazardous substances were disposed of there, or as a successor in interest.

32. The building in which Old Bridge Minerals operates, OU1 and OU3 of the Site, and the Site itself are each a “facility” as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

33. There has been a “release” or a “threatened release” of “hazardous substances” into the “environment” at or from OU1 and OU3 of the Site, as those terms are defined in Section 101 of CERCLA, 42 U.S.C. § 9601.

34. In undertaking response actions to address the release or threat of release of hazardous substances from metals contamination at OU1 and OU3 of the Site, EPA has incurred and will continue to incur “response costs” as defined in Section 101(25) of CERCLA, 42 U.S.C. § 9601(25).

35. The response costs incurred thus far were incurred in a manner not inconsistent with the National Contingency Plan, promulgated under Section 105 of CERCLA. 42 U.S.C. § 9605 and codified at 40 C.F.R. Part 300.

36. Under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), Defendants are each jointly and severally liable for all OU1 response costs for metals contamination and all OU3 response costs incurred by the United States, including enforcement costs and prejudgment interest.

SECOND CLAIM FOR RELIEF

Injunctive Relief Under CERCLA Section 106

37. The above paragraphs are re-alleged and incorporated herein by reference.

38. EPA has determined that there is or may be an imminent and substantial endangerment to the public health or welfare or the environment because of actual or threatened releases of hazardous substances at or from the metals contamination of OU1 and OU3 of the Site.

39. Under Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), Defendants are jointly and severally liable for injunctive relief to abate the danger or threat presented by a release or threatened release of hazardous substances into the environment at or from metals contamination at OU1 and OU3 of the Site.

40. EPA has determined that the response actions selected in the OU1/OU2 Record of Decision are necessary to abate the danger or threat at or from metals contamination at OU1 of the Site.

41. EPA has determined that the response actions selected in the OU3 Record of Decision are necessary to abate the danger or threat at or from OU3 of the Site.

42. Under Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), Defendants are each jointly and severally liable to undertake the remedial action as described

in the OU1/OU2 Record of Decision for metals contamination at OU1 and in the OU3 Record of Decision to abate the danger or threat at or from OU3 of the Site.

PRAYER FOR RELIEF

WHEREFORE, the United States respectfully requests that this Court:

- a. Enter judgment in favor of the United States and against the Defendants, jointly and severally, under Section 107(a)(1) and (2) of CERCLA, 42 U.S.C. § 9607(a)(1) & (2), for unreimbursed response costs incurred by the United States relating to metals contamination at OU1 and OU3, including enforcement costs and prejudgment interest, but excluding costs that are to be reimbursed under previously entered into administrative orders on consent;
- b. Enter an order under Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), requiring the Defendants to perform the response actions for metals contamination at OU1 (metals contamination) and for OU3 as described in the OU1/OU2 Record of Decision and the OU3 Record of Decision;
- c. Enter a declaratory judgment on Defendants' liability that will be binding in any subsequent action for further response costs, pursuant to Section 113(g)(2) of CERCLA, 42 U.S.C. § 9613(g)(2).
- g. Grant such other and further relief as the Court deems just and proper.

Respectfully Submitted,

TODD KIM
Assistant Attorney General
Environment and Natural Resources
Division
United States Department of Justice

December 10, 2024
Dated

/s/ Alexandra B. Sherertz
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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service 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. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Alexandra Sherertz, U.S. Department of Justice, P.O. Box
7611, Washington, DC 20044-7611 (202) 598-5263**DEFENDANTS**ARNET REALTY COMPANY, L.L.C.; OLD BRIDGE
MINERALS, INC.; AND HB WAREHOUSING, LLCCounty of Residence of First Listed Defendant Middlesex
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☒ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit (15 USC 1681 or 1692) ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
Sections 106 and 107 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§ 9606 and 9607
Brief description of cause:
Reimbursement of costs incurred; response action by the defendants at the Site consistent with the National Contingency Plan, 40 C.F.R. part 300

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** _____ CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE

Dec 10, 2024

SIGNATURE OF ATTORNEY OF RECORD

/s/ Alexandra B. Sherertz

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM 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 service of pleading 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. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
 - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
 - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.