

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

**IN RE: HAIR RELAXER MARKETING
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION**

**MDL No. 3060
Case No. 23 C 818
District Judge Mary M. Rowland
Magistrate Judge Beth W. Jantz**

**This document relates to:
All Cases**

ORDER OF SPECIAL MASTER

The above-captioned matter having been brought before this Court, by Plaintiffs, and having been heard and decided by Special Master Maura R. Grossman (the “Special Master”), pursuant to the authorization of this Court, regarding the deposition and document production of Patricia Grant Willaims, a Revlon Consumer Products Corporation and / or Revlon Group Holdings LLC and / or Revlon Inc; and / or Roux Laboratories, Inc. (“Revlon”) consultant and the owner of the Mosaic Model and Talent Management and a former employee and consultant to The Colomer Group;

And the matter having been heard by Special Master Grossman, on October 22, 2025;

Whereas the Special Master having considered, Exhibit A , the attached Plaintiffs’ “Notice of Oral Deposition of Patricia Grant Willaims Pursuant To Federal Rule of Civil Procedure 30” dated August 1, 2025, including the Plaintiffs’ demand for the “complete custodial file” of Patricia Grant Willaims;

Whereas the Special Master having considered the oral deposition testimony of Patricia Grant Willaims of October 6, 2025 regarding, among other things, storage units in the possession, custody, or control of Patricia Grant Willaims;

Whereas the Special Master having considered that there may be Revlon-, Roux- and / or Colomer-related materials in said storage units;

Whereas Patricia Grant Willaims and Mosaic Model and/ or Talent Management were at times third-party vendors and/or employee of Defendant Revlon;

Whereas Patricia Grant Willaims and/or Mosaic Model and Talent Management may have materials in their possession, custody, or control which may be relevant to this litigation and may be relevant to a hair relaxers and / or hair relaxer kits manufactured and sold by Defendant Revlon and / or Colomer;

It is on this 27th day of October 2025 ORDERED :

1. That Patricia Grant Willaims and Mosaic Model and Talent Management review the Patricia Grant Willaims and /or Mosaic Model and Talent Management storage units by November 25, 2025 for any documents in the storage units in any way related to Revlon, Roux, and /or Colomer;
2. That any documents related to Revlon, Roux, and / or Colomer in the storage units maintained by Patricia Grant Willaims and/or Mosaic Model and Talent Management be provided to counsel for Revlon for scanning by the Revlon document manager;
3. That counsel for Revlon review said scanned materials for relevancy and production to Plaintiffs' counsel forthwith and provide same to counsel for Plaintiffs no later than December 2, 2025;
4. That Patricia Grant Willaims and Mosaic Model and Talent Management may comply with the aforementioned Court-ordered review of the storage units by giving access to the storage units to counsel for Revlon in the above-captioned litigation and for Revlon counsel to conduct said review;
5. That the continued deposition of Patricia Grant Willaims shall be reconvened on a date convenient to witness Patricia Grant Willaims and completed by December 9, 2025;
6. That the deposition of Patricia Grant Willaims may proceed on a weekend date if that is the most convenient date for the witness;
7. That once the storage units have been reviewed, the documents scanned and reviewed for relevance, the documents produced to Plaintiffs and the deposition of Patricia Grant Willaims completed, the storage units at issue may be relinquished at the option of Patricia Grant Williams; and
8. That the Special Master will retain jurisdiction as to any disputes which may arise regarding the issues set forth in this Order .

October 27, 2025

Maura R. Grossman

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Date: 2025.10.27 11:48:25 -04'00'

Special Master Maura R. Grossman

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: HAIR RELAXER MARKETING
SALES PRACTICES AND PRODUCTS
LIABILITY LITIGATION**

Case No. 23 C 818

MDL No. 3060

Judge Mary M. Rowland

**NOTICE OF ORAL DEPOSITION OF PATRICIA WILLIAMS
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30**

TO: Defendants Revlon, Inc., Revlon Consumer Products Corporation, and Revlon Group Holdings LLC and its Attorneys of Record.

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure Rule 30, the Plaintiffs' Steering Committee will take the deposition upon oral examination of Patricia Williams.

PLEASE TAKE FURTHER NOTICE that the deposition will commence on a mutually agreed date to be determined at 9:00 am, and will continue until completed, at mutually agreed location to be determined. Said deposition will be taken before a court reporter authorized to administer oaths, pursuant to Federal Rule of Civil Procedure 28, and will be recorded on videotape. This deposition is being taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure and the local rules.

PLEASE TAKE FURTHER NOTICE that the deponent should produce, no later than thirty (30) days prior to the deposition, the deponent's complete custodial file and copies of all prior sworn testimony, no later than twenty (21) days before the deposition, the deponent's personnel file reflecting compensation and/or bonuses and all performance reviews related to hair relaxer products, and no later than seven (7) days before the deposition, the deponent's curriculum vitae. The deponent should also bring with him any and all documents having to do with materials that he used and/or reviewed in anticipation and preparation of the deposition.

Counsel for all parties are invited to attend and participate.

Dated: August 1, 2025

Respectfully submitted,

/s/ Diandra "Fu" Debrosse Zimmermann

Diandra "Fu" Debrosse Zimmermann

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Oral Deposition of Patricia Williams, pursuant to Federal Rule of Civil Procedure 30 was served on August 1, 2025, via electronic mail on the following counsel of record, with copy to liaison counsel at MDL3060_DefenseLiaison@bakerserv.com:

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/s/ Kristin D. Padden
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