

No. 20-

IN THE
Supreme Court of the United States

JOHNSON & JOHNSON and
JOHNSON & JOHNSON CONSUMER INC.,
Petitioners,

v.

GAIL L. INGHAM, *et al.*,
Respondents.

**On Petition for a Writ of Certiorari to the
Missouri Court of Appeals for the
Eastern District**

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether a court must assess if consolidating multiple plaintiffs for a single trial violates due process, or whether it can presume that jury instructions always cure both jury confusion and prejudice to the defendant.

2. Whether a punitive-damages award violates due process when it far exceeds a substantial compensatory-damages award, and whether the ratio of punitive to compensatory damages for jointly and severally liable defendants is calculated by assuming that each defendant will pay the entire compensatory award.

3. Whether the “arise out of or relate to” requirement for specific personal jurisdiction can be met by merely showing a “link” in the chain of causation, as the court below held, or whether a heightened showing of relatedness is required, as petitioner in *Ford Motor Co. v. Montana Eighth Judicial District Court*, No. 19-368, has argued.

(i)

PARTIES TO THE PROCEEDING

Johnson & Johnson and Johnson & Johnson Consumer Inc., petitioners on review, were defendants-appellants below.

Gail L. Ingham, Robert Ingham, Laine Goldman, Carole Williams, Monica Sweat, Gregory Sweat, Robert Packard, Andrea Schwartz-Thomas, Janus Oxford, William Oxford, Stephanie Martin, Ken Martin, Shelia Brooks, Martin Maillard, Krystal Kim, Annette Koman, Allan Koman, Toni Roberts, Marcia Owens, Mitzai Zschiesche, Tracee Baxter, Cecilia Martinez, Olga Salazar, Karen Hawk, Mark Hawk, Pamela Scarpino, Jackie Herbert North, Marvin Walker, and Talmadge Williams, respondents on review, were plaintiffs-appellees below.

RULE 29.6 DISCLOSURE STATEMENT

1. Johnson & Johnson has no parent corporation, and no publicly held company owns 10% or more of Johnson & Johnson's stock.

2. Johnson & Johnson Consumer Inc. is wholly owned by Janssen Pharmaceuticals, Inc. Janssen Pharmaceuticals, Inc. is wholly owned by DePuy Synthes, Inc. DePuy Synthes, Inc. is wholly owned by Johnson & Johnson International. Johnson & Johnson International is wholly owned by Johnson & Johnson, which is a publicly held company.

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