

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

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DOROTHY BROWN
CIRCUIT CLERK
COOK COUNTY, IL
2018L010183

JULIE CANNELL, Individually and On Behalf of All Those
Similarly Situated;
PAMELA MCGONIGAL, Individually and On Behalf of All
Those Similarly Situated.

Plaintiffs,

v.

No: 2018 L 010183

STERIGENICS U.S. LLC; and
GTCR LLC.

Defendants.

FIRST AMENDED CLASS ACTION COMPLAINT

NOW COMES Plaintiffs PAMELA MCGONIGAL, Individually and on Behalf of All Those Similarly Situated, and JULIE CANNELL, Individually and on Behalf of All Those Similarly Situated, by and through their attorneys, POWER ROGERS & SMITH, LLP and KOREIN TILLERY LLC, and hereby complaining of Defendants, STERIGENICS U.S. LLC (hereinafter "Sterigenics") and GTCR LLC (hereinafter "GTCR"), pleading hypothetically and in the alternative, states as follows:

NATURE OF THE ACTION

1. This cause of action arises out of Defendant Sterigenics' decades long emissions of ethylene oxide (EtO) from its plant in Willowbrook, IL. The plant is used to sterilize medical devices, pharmaceuticals, and food products by placing them into sealed chambers, which are then sprayed with ethylene oxide, a powerful sterilizing agent. Ethylene oxide is a highly flammable, colorless gas and has been a known human carcinogen for decades. On July 26,