C A N A D A

PROVINCE OF QUEBEC
DISTRICT OF MONTREAL
NO.: 500-06-000555-116

S U P E R I O R C O U R T
(Class Action)

RICHARD BRUNET, Mortgage broker, domiciled and residing at 1330 rue du Mont Hibou, in the City of Ste Adèle, Province of Quebec, J8B 1X7;

Petitioner

-vs-

ZIMMER OF CANADA LIMITED, a legal person, duly constituted according to the laws of Canada, having its head office located at 2323 Argentia Road, Mississauga, in the Province of Ontario, L5N 5N3;

-and-

ZIMMER INC., a legal person, duly constituted according to law, with its head office located at 1800 West Center Street, Warsaw, Indiana, USA 46581-0708;

-and-

SPÉCIALITÉS CHIRURGICALES R.M. INC., a legal person, duly constituted according to law, having its head office located at 4280 Sere Street, in the City of St-Laurent, District of Montreal, Province of Quebec, H4T 1A6;

Respondents
Solidarily

MOTION FOR AUTHORIZATION TO INSTITUTE A CLASS ACTION AND TO OBTAIN THE STATUS OF REPRESENTATIVE
(Articles 1002 et seq. *C.C.P.*)

TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT, SITTING IN AND FOR THE DISTRICT OF MONTREAL, PETITIONER RESPECTFULLY SUBMITS THE FOLLOWING:

1. **THE PETITIONER WISHES TO INSTITUTE A CLASS ACTION ON BEHALF OF THE CLASS OF PERSONS HEREINAFTER DESCRIBED, NAMELY:**

All natural persons in Quebec who underwent total hip replacement surgery in the Province of Quebec since 2005, and who had a Durom Large-Diameter Head–Total Hip Arthroplasty ("Durom LDH-THA") surgically implanted.

2. **THE PETITIONER'S PERSONAL CLAIM AGAINST THE RESPONDENTS IS BASED ON THE FOLLOWING FACTS:**

THE PARTIES

2.1. The Petitioner is an individual who underwent total hip replacement surgery / total hip arthroplasty on his left hip on November 13, 2007 at Hôpital Maisonneuve Rosemont (HMR), during which time a Durom LDH-THA was surgically implanted (hereinafter, the "Initial Surgery"). A copy of the Protocole Opératoire for the Initial Surgery is produced herewith as Exhibit P-1.

2.2. Soon after the Initial Surgery, the Petitioner recovered and was pain-free. However, over time the Petitioner began to experience considerable pain in his groin and buttocks, and required an additional operation.

2.3. On October 19, 2010, the Petitioner underwent an additional operation at HMR (hereinafter, "Revision Surgery"), as it became necessary to remove the Durom LDH-THA that had been implanted during the Initial Surgery. A copy of the Protocole Opératoire for the Revision Surgery is produced herewith as Exhibit P-2.

2.4. The Respondents (collectively, "Zimmer") are corporations that design, manufacture, sell, market and/or distribute surgical products and medical implants, including the Durom LDH-THA used in total hip replacement surgery in general, and the Durom LDH-THA implanted into the Petitioner during the Initial Surgery, and into the other members of the Class, in particular.

GENERAL BACKGROUND ON TOTAL HIP ARTHROPLASTY (THA)

2.5. Patients who require total hip replacement, or THA, undergo surgery to have a hip implant inserted. During THA, a hip implant system is inserted, consisting of (i) a head or "cup", (ii) a femoral stem or "stem", and (iii) a modular junction or "sleeve", which connects the cup and the stem.

2.6. The lifespan of a proper and safe hip implant system inserted during THA is generally approximately 20-25 years, during which time the patient does not experience hip pain and can engage in activities engaged in by people who do not require THA.

2.7. The Durom LDH-THA was designed in particular for relatively young and active patients in order to enable such patients to resume active lifestyles and athletic activity.

THE PROBLEM WITH ZIMMER'S DUROM LDH-THA

2.8. The Durom LDH-THA system in general, and the "sleeve" component in particular, has a manufacturing/design defect in that it causes the release of an excessive amount of ions, causing premature wear and often resulting in patients suffering abnormal osteolysis and bone resorption approximately 3-6 years following THA.

2.9. The sleeve component of a proper hip implant system does not wear or result in the release of excessive ions, as does the sleeve component of the defective Durom LDH-THA.

2.10. As a result of the defect in the Durom LDH-THA system, patients are experiencing abnormal groin pain approximately 6 months following THA, which is unfortunately difficult to diagnose on X-Ray until several years following THA; as a result, patients experience pain for many years, which orthopedic surgeons cannot properly explain.

2.11. As a result of the bone resorption and osteolysis caused by the defect in the Durom LDH-THA system, patients may require complicated Revision Surgery to remove the Durom LDH-THA and replace it with a different hip implant system which is free of defects.

2.12. Orthopedic surgeons in Canada and Germany reported the foregoing defect to Zimmer in or around the end of 2008.

2.13. Notwithstanding the foregoing, Zimmer failed to notify the medical community of the problems reported with the Durom LDH-THA, failed to warn patients, failed to recall the products and failed to repair the defect.

2.14. The Petitioner experienced the very problems associated with the defective Durom LDH-THA; namely, several months following the Petitioner's Initial Surgery, he experienced increasing pain, and approximately 3 years after his Initial Surgery, the Petitioner required Revision Surgery to remove the Durom LDH-THA.

2.15. As appears from the Protocole Opératoire for the Petitioner's Revision Surgery (Exhibit P-2), the Petitioner's orthopedic surgeon noted significant and abnormal osteolysis and bone resorption, "secondaire à une métalose originant de la jonction entre la tête fémorale et la tige".

ZIMMER'S LIABILITY

2.16. Zimmer is regarded as a world leader in the design and manufacture of medical implants, including hip implants.

2.17. Zimmer designed and manufactured the Durom LDH-THA, and then marketed, sold and distributed said hip implant system to the medical community in Quebec, to be inserted into patients such as the Petitioner.

2.18. The Durom LDH-THA is defective in that it results in abnormal and premature wear and bone resorption, due to the release of an excessive amount of ions by the Durom LDH-THA in general, and by the "sleeve", in particular.

2.19. Zimmer failed to properly test and inspect the Durom LDH-THA system before selling and distributing it to the medical community to be inserted into patients.

2.20. Zimmer knew or ought to have known that faulty inspection and the failure to remove a defect in the Durom LDH-THA system prior to marketing the product would cause disastrous consequences for patients undergoing THA in general, and for the Petitioner and all members of the Class, in particular.

2.21. Zimmer failed to act responsibly and diligently after first receiving reports of the defect from orthopedic surgeons, by failing to inform the medical community, by failing to warn patients and by failing to take measures to repair the defect, thereby exposing patients in general, and the members of the Class in particular, to pain, suffering and the harmful consequences of having a defective implant inserted in their hips.

THE DAMAGES

2.22. Prior to the Initial Surgery, the Petitioner was in excellent health, was active, and exercised regularly three times per week.

2.23. The Petitioner worked as a mortgage broker, and also owned a management company that pooled money to make private loans.

2.24. Several months following the Initial Surgery, the Petitioner began experiencing pain in his groin and buttocks. The pain became increasingly

severe, limiting the Petitioner's ability to exercise, to walk or to sit for long periods of time, and preventing the Petitioner from devoting as much time to his work as he wished to devote.

2.25. Less than 3 years after undergoing his Initial Surgery, the Petitioner required Revision Surgery, a difficult and painful procedure, entailing bone resorption, increased risk of infection and other adverse consequences.

2.26. The Petitioner will require follow-up medical attention as well as most probably suffer the long-term effects of having to undergo Revision Surgery, which should not have been necessary.

2.27. Notwithstanding the Revision Surgery in October 2010, the Petitioner continues to experience pain and discomfort; he has been unable to resume the activities he enjoyed prior to the Initial Surgery, and he has been unable to resume working in the manner that he intended to.

2.28. As a result, the Petitioner is entitled to claim and does hereby claim from the Respondents an amount of $150,000.00 for non-pecuniary damages, and an amount of $200,000.00 for pecuniary damages.

2.29. In addition, inasmuch as the Respondents failed to act in a responsible manner upon learning of the defect associated with the Durom LDH-THA and of the drastic consequences that patients would suffer, the Petitioner is also entitled to claim and does hereby claim an amount of $10,000.00 as exemplary and punitive damages, the whole pursuant to the *Quebec Charter of Human Rights and Freedoms*.

2.30. The Petitioner underwent the Initial Surgery and the Revision Surgery, and he has suffered his damages in the Province of Quebec.

3. **THE PERSONAL CLAIMS OF EACH OF THE MEMBERS OF THE CLASS AGAINST RESPONDENTS ARE BASED ON THE FOLLOWING FACTS:**

3.1. All members of the Class were implanted with the defective Durom LDH-THA during total hip replacement surgery.

3.2. The claims of each of the members of the Class are based on the same facts as those upon which the claim of Petitioner is based, as set forth above.

3.3. In particular, each member of the Class has had a defective hip implant inserted into him/her since 2005, during THA.

3.4. As a result, members of the Class have already, or likely will in the future, experience pain and suffering associated with abnormal and premature wear of the sleeve of the Durom LDH-THA, as well as mental anguish knowing that they have been implanted with a defective product.

3.5. In addition, many members of the Class will require Revision Surgery to remove and replace the defective Durom LDH-THA.

3.6. Furthermore, patients who require Revision Surgery are exposed to an increased risk of infection and other detrimental consequences of additional hip replacement surgery.

3.7. Accordingly, each member of the Class has sustained damages similar to those sustained by the Petitioner.

3.8. The Petitioner is accordingly entitled to claim and does hereby claim from the Respondents, both personally and on behalf of each member of the Class, compensatory damages in the amount of $150,000.00 per Class member for non-pecuniary damages, and an amount to be determined by the Court per Class member for pecuniary damages.

3.9. The Petitioner is also entitled to claim and does hereby claim from the Respondents, both personally and on behalf of each member of the Class, an amount of $10,000.00 per Class member for punitive and exemplary damages, the whole pursuant to the *Quebec Charter of Human Rights and Freedoms*.

4. THE COMPOSITION OF THE MEMBERS OF THE CLASS MAKES THE APPLICATION OF ARTICLES 59 AND 67 C.C.P. DIFFICULT AND/OR IMPRACTICAL FOR THE FOLLOWING REASONS:

4.1. To the best of Petitioner's knowledge, Zimmer has been marketing, selling and distributing the Durom LDH-THA in Quebec since 2005.

4.2. To the best of Petitioner's knowledge, approximately 300 patients per year since 2005 have been implanted with the Durom LDH-THA during total hip replacement surgery in Quebec, such that approximately 1,500 people in Quebec have been implanted with the defective Durom LDH-THA.

4.3. It would therefore be difficult and impractical for the Petitioner to locate and contact all members of the Class to obtain a mandate to institute proceedings for their benefit.

4.4. Furthermore, inasmuch as Zimmer has failed to inform the medical community of the defect in the Durom LDH-THA, and inasmuch as the

abnormal bone resorption associated with the defect often takes several years following the Initial Surgery to appear on an X-Ray, many members of the Class are unaware that they have been implanted with a defective product which entitles them to be awarded damages.

5. **THE IDENTICAL, SIMILAR OR RELATED QUESTIONS OF LAW OR OF FACT BETWEEN EACH MEMBER OF THE CLASS AND THE RESPONDENTS, WHICH PETITIONER WISHES TO HAVE DECIDED BY THIS CLASS ACTION, ARE:**

5.1. Does the Durom LDH-THA hip implant system, and the sleeve in particular, contain a manufacturing and/or design defect?

5.2. By manufacturing, selling, distributing and marketing a defective product to be surgically implanted into patients during LDH-THA, did Zimmer commit a fault for which it is liable to pay compensatory damages to the Petitioner and the members of the Class?

5.3. Did Zimmer know or is Zimmer deemed to have known of the defects in the Durom LDH-THA?

5.4. Did Zimmer fail to warn the public and the medical community in a responsible and timely manner of problems reported with the Durom LDH-THA?

5.5. Did Zimmer continue to market and distribute the Durom LDH-THA in Quebec even after having been informed of problems associated with the product which entail drastic consequences for patients?

5.6. Is Zimmer responsible to pay punitive and exemplary damages to the Petitioner and the members of the Class?

5.7. What is the amount of damages sustained by the Class, collectively, as a result of the faults of the Respondents?

6. **THE QUESTIONS OF LAW OR OF FACT WHICH ARE PARTICULAR TO EACH OF THE MEMBERS OF THE CLASS ARE:**

6.1. What is the extent of the pecuniary and non-pecuniary damages sustained by each member of the Class?

7. **IT IS EXPEDIENT THAT THE INSTITUTION OF A CLASS ACTION FOR THE BENEFIT OF THE MEMBERS OF THE CLASS BE AUTHORIZED FOR THE FOLLOWING REASONS:**

7.1. The Class action is the best procedural vehicle available to members of the Class in order to protect and enforce their rights herein.

7.2. While the amount of the damages and loss sustained by each member of the Class may differ, the faults of the Respondents and their liability therefor are identical with respect to each member.

7.3. Members of the Class who have been implanted with defective Durom LDH-THA hip implant systems and who have suffered relatively minor pain and suffering, in the absence of a class action, could be prevented from instituting a separate recourse against the Respondents in view of the costs involved to enforce their rights compared to the value of the damages they may have suffered.

7.4. The great number of patients who were implanted with a defective Durom LDH-THA could, in the absence of a class action, lead to a multitude of recourses against the Respondents to determine the same issues of fact and law, and which will entail an inefficient and costly use of judicial resources, the duplication of costly expertise, and result in contradictory judgments on questions of fact or law which are identical for each member of the Class.

8. **THE NATURE OF THE RECOURSE WHICH THE PETITIONER WISHES TO EXERCISE ON BEHALF OF THE MEMBERS OF THE CLASS IS:**

8.1. An Action in damages against the Respondents to sanction the design, manufacture, sale and distribution of defective Durom LDH-THA systems for implantation into unsuspecting patients who underwent total hip replacement surgery in Quebec since 2005.

9. **THE CONCLUSIONS SOUGHT BY PETITIONER AGAINST THE RESPONDENTS ARE AS FOLLOWS:**

GRANT the Class Action against the Respondents;

CONDEMN the Respondents, solidarily, to pay to the Petitioner and to each member of the Class, non-pecuniary damages in the amount of $150,000.00, to be recovered collectively, the whole with interest and the additional indemnity provided by law;

CONDEMN the Respondents, solidarily, to pay to the Petitioner pecuniary damages in the amount of $200,000.00, and to pay to all members of the Class pecuniary damages in an amount to be determined by the Court, the whole with interest and the additional indemnity provided by law.

CONDEMN the Respondents, solidarily, to pay to the Petitioner and to each member of the Class, exemplary and punitive damages in the amount of $10,000.00, to be recovered collectively, the whole with interest and the additional indemnity provided by law.

RESERVE the rights of the members of the Class to apply for additional damages, the whole in accordance with Article 1615 of the *Civil Code of Quebec*;

ORDER collective recovery of the total amount of the claims herein;

ORDER that the claims of the members of the Class be the object of individual liquidation in accordance with Articles 1037 to 1040 C.C.P. or, if impractical or inefficient, order the Respondents to perform any remedial measures that this Honourable Court deems to be in the interests of the members of the Class;

ORDER the Respondents to advise all hospitals and/or medical clinics in the Province of Quebec, which purchased the defective Durom LDH-THA systems of the present Class Action lawsuit, and **DEMAND** that these hospitals and/or clinics advise all of their patients who were implanted with the defective Durom LDH-THA of the pending Class Action and of their right to contact Class Counsel;

CONDEMN the Respondents to any further relief as may be just and proper;

THE WHOLE with costs, including the costs of all exhibits, reports, expertise and publication of notices.

10. **PETITIONER REQUESTS THAT HE BE ASCRIBED THE STATUS OF REPRESENTATIVE;**

11. **PETITIONER IS IN A POSITION TO REPRESENT THE MEMBERS OF THE CLASS ADEQUATELY FOR THE FOLLOWING REASONS:**

11.1. The Petitioner is a 62 year-old intelligent and healthy businessman.

11.2. The Petitioner, like the other members of the Class, underwent total hip arthroplasty, during which time he was implanted with a defective Durom LDH-THA, manufactured, designed and distributed by the Respondents.

11.3. The Durom LDH-THA was specifically marketed and purportedly designed for young patients such as the Petitioner; the Petitioner is accordingly the typical patient who receives the Durom LDH-THA during total hip replacement surgery, and can therefore understand and relate to the problems experienced by the members of the Class associated with the Durom LDH-THA.

11.4. While the Petitioner legitimately expected the hip implant to last for a minimum of 20 years, the Petitioner began experiencing pain months after his Initial Surgery, and thereafter required Revision Surgery, such that he has suffered damages that many members of the Class have suffered, or soon will also suffer.

11.5. The Petitioner is well-informed of and understands the facts giving rise to the present Action and the nature of the present Action.

11.6. The Petitioner is determined to devote the time necessary to act as the representative of the Class in this Action, and has demonstrated that he is dedicated to obtaining justice for all members of the Class.

11.7. The Petitioner does not have any conflict of interest with the members of the Class.

11.8. The Petitioner has retained competent counsel with experience in class actions and medical product liability in general, and with significant experience in class actions pertaining to defective hip implants in particular.

11.9. The Petitioner has fully cooperated with the undersigned attorneys in the context of this Action, including answering diligently and intelligently to their questions, and there is every reason to believe that he will continue to do so.

11.10. The Petitioner will fairly and adequately represent and protect the rights of the members of the Class, and will take measures with the undersigned attorneys to keep the members of the Class informed of the present Class Action.

11.11. The Petitioner is in at least as good a position as any other member of the Class to serve as the Class Representative in the present Action.

12. **PETITIONER SUGGESTS THAT THE CLASS ACTION BE BROUGHT BEFORE THE SUPERIOR COURT FOR THE DISTRICT OF MONTREAL FOR THE FOLLOWING REASONS:**

12.1. To the best of Petitioner's knowledge, the majority of the members of the Class are domiciled in the City of Montreal. The vast majority of Quebec patients who were implanted with the defective Durom LDH-THA underwent their Initial Surgery in Montreal.

12.2. The Respondents' Quebec-based distributor is located in the District of Montreal.

12.3. The Petitioner's undersigned attorneys practice in the District of Montreal.

12.4. The Respondents market and distribute the defective Durom LDH-THA throughout Montreal.

13. The present Motion is well-founded in fact and in law;

WHEREFORE THE PETITIONER PRAYS THAT BY JUDGMENT TO BE RENDERED HEREIN;

a) The present Motion be granted;

b) That the institution of a Class action be authorized as follows:

An Action in damages against the Respondents to sanction the design, manufacture, sale and distribution of defective Durom LDH-THA systems for implantation into unsuspecting patients who underwent total hip replacement surgery in Quebec since 2005.

c) That the status of representative be granted to Richard Brunet for the purpose of instituting the said Class Action for the benefit of the following group of persons, namely:

All natural persons who underwent total hip replacement surgery in the Province of Quebec since 2005, and who had a Durom Large-Diameter Head–Total Hip Arthroplasty ("Durom LDH-THA") surgically implanted.

d) That the principal questions of law and of fact to be dealt with collectively be identified as follows:

1. Does the Durom LDH-THA hip implant system, and the sleeve in particular, contain a manufacturing and/or design defect?

2. By manufacturing, selling, distributing and marketing a defective product to be surgically implanted into patients during LDH-THA, did Zimmer commit a fault for which it is liable to pay compensatory damages to the Petitioner and the members of the Class?

3. Did Zimmer know or is Zimmer deemed to have known of the defects in the Durom LDH-THA?

4. Did Zimmer fail to warn the public and the medical community in a responsible and timely manner of problems reported with the Durom LDH-THA?

5. Did Zimmer continue to market and distribute the Durom LDH-THA in Quebec even after having been informed of problems associated with the product which entail drastic consequences for patients?

6. Is Zimmer responsible to pay punitive and exemplary damages to the Petitioner and the members of the Class?

7. What is the amount of damages sustained by the Class, collectively, as a result of the faults of the Respondents?

e) That the conclusions sought by the Petitioner in relation to such questions are as follows:

GRANT the Class Action against the Respondents;

CONDEMN the Respondents, solidarily, to pay to the Petitioner and to each member of the Class, damages in the amount of $150,000.00, to be recovered collectively, the whole with interest and the additional indemnity provided by law;

CONDEMN the Respondents, solidarily, to pay to the Petitioner pecuniary damages in the amount of $200,000.00, and to pay to all members of the Class pecuniary damages in an amount to be determined by the Court, the whole with interest and the additional indemnity provided by law.

CONDEMN the Respondents, solidarily, to pay to the Petitioner and to each member of the Class, exemplary and punitive damages in the amount of $10,000.00, to be recovered collectively, the whole with interest and the additional indemnity provided by law.

RESERVE the rights of the members of the Class to apply for additional damages, the whole in accordance with Article 1615 of the *Civil Code of Quebec*;

ORDER collective recovery of the total amount of the claims herein;

ORDER that the claims of the members of the Class be the object of individual liquidation in accordance with Articles 1037 to 1040 C.C.P. or, if impractical or inefficient, order the Respondents to perform any remedial measures that this Honourable Court deems to be in the interests of the members of the Class;

ORDER the Respondents to advise all hospitals and/or medical clinics in the Province of Quebec, which purchased the defective Durom LDH-THA systems of the present Class Action lawsuit, and **DEMAND** that these hospitals and/or clinics

advise all of their patients who were implanted with the defective Durom LDH-THA of the pending Class Action and of their right to contact Class Counsel;

CONDEMN the Respondents to any further relief as may be just and proper;

THE WHOLE with costs, including the costs of all exhibits, reports, expertise and publication of notices.

f) That it be declared that any member of the Class who has not requested his/her exclusion from the Class be bound by any judgment to be rendered on the Class action, in accordance with law;

g) That the delay for exclusion from the Class be fixed at sixty (60) days from the date of notice to the members, and at the expiry of such delay, the members of the Class who have not requested exclusion be bound by any such judgment;

h) That it be ordered that a notice to the members of the Class be drafted according to the terms of form VI of the Rules of Practice of the Superior Court of Quebec and that it be made public within fifteen (15) days of judgment to intervene in the present Motion in the following manner:

1. By publication of a notice to members of the Class in newspapers throughout the Province of Quebec on two (2) Saturdays, in accordance with the model notice provided for as form VI of the Rules of Practice of the Superior Court of Quebec;

2. By publication of the notice to members of the Class on the internet site of the Respondents and the internet site of the attorneys for Petitioner with a hypertext entitled "Avis aux members de recours collectif, Notice to all Class Action Members" prominently displayed on Respondents' internet site and to be maintained thereon until the Court orders publication of another notice to members by final judgment in this instance or otherwise;

i) That the record be referred to the Chief Justice so that he may fix the district in which the Class action is to be brought and the Judge before whom it will be heard;

j) That in the event that the Class action is to be brought in another district, the Clerk of this Court be ordered upon receiving the decision of the Chief Justice, to transmit the present record to the Clerk of the district so designated.

k) That in the event a Class action is to be instituted, notice of same be published on the Class Action Registry maintained for said purposes in the Province of Quebec.

THE WHOLE with costs, including the costs of all publications of notices.

MONTREAL, February 2, 2011.

(sgd) Kugler Kandestin LLP, S.E.N.C.R.L.

KUGLER KANDESTIN, L.L.P.
Attorneys for Petitioner

True Copy / Copie Conforme

Kugler Kandestin LLP, S.E.N.C.R.L.

NOTICE OF PRESENTATION

TO: **ZIMMER OF CANADA LIMITED,**
2323 Argentia Road,
Mississauga, Ontario,
L5N 5N3;

&: **ZIMMER INC.,**
1800 West Center Street,
Warsaw, Indiana,
USA 46581-0708.

&: **SPÉCIALITÉS CHIRURGICALES R.M. INC.,**
4280 Sere Street,
St-Laurent, Quebec,
H4T 1A6;

SIRS:

TAKE NOTICE of the foregoing *Motion for Authorization to Institute a Class Action and to Obtain the Status of Representative* attached hereto and that same will be presented for adjudication before one of the Judges of this Honourable Court, sitting in and for the Judicial District of Montreal, in Room 2.16 of the Courthouse, situated at 1 Notre-Dame Street East, Montreal, Quebec, on the **25th day of February 2011**, at 9:00 a.m., or so soon thereafter as counsel may be heard.

DO GOVERN YOURSELVES ACCORDINGLY.

MONTREAL, February 2, 2011.

(sgd) Kugler Kandestin LLP, S.E.N.C.R.L.

KUGLER KANDESTIN, L.L.P.
Attorneys for Petitioner

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Kugler Kandestin LLP, S.E.N.C.R.L.