

Defendants and other issues

PEOPLE'S REPUBLIC OF CHINA;

NATIONAL HEALTH COMMISSION OF THE PEOPLE'S REPUBLIC OF CHINA;

MINISTRY OF EMERGENCY MANAGEMENT OF THE PEOPLE'S REPUBLIC OF CHINA;

MINISTRY OF CIVIL AFFAIRS OF THE PEOPLE'S REPUBLIC OF CHINA;

THE PEOPLE'S GOVERNMENT OF HUBEI PROVINCE;

and THE PEOPLE'S GOVERNMENT OF CITY OF WUHAN, CHINA.

- a. Failure to admit their knowledge of the dangers of the virus, its lethality, and the ease of human to human transmission;
- b. Failure to contain the virus in its early stages when they knew or should have known of its dangers and ease of transmission;
- c. Failure to contain the virus more quickly when the spread was apparent;
- d. Failure to restrict a public gathering of more than 40,000 Wuhan families when they knew or should have known of the dangers of the virus and ease of transmission;
- e. Failure of the governmental entities to adequately and reasonably supervise the outbreak and contain its effects;
- f. Failure to provide adequate and reasonable warning to Named Plaintiffs and members of the classes when they knew or should have known of the dangers described herein; and
- g. Dissemination of materials and statements that provided the wrong information to people within and outside China.