

CJ-11-7549
PARRISH

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

OCT 21 2011
PATRICIA PROSEY, COURT CLERK
by: [Signature] DEPUTY

TERRIE S. LANSFORD and
ALONZO LANSFORD,

Plaintiffs,

v.

PFIZER INC.,
LYNN HEALTH SCIENCE INSTITUTE INC.,

Defendants.

No.

CJ - 2011 - 7 5 4 9

1. In October, 2009, and for several months, Plaintiff TERRIE S. LANSFORD took the study drug Tanezumab, manufactured by Defendant PFIZER INC. and administered by Defendant LYNN HEALTH SCIENCE INSTITUTE INC. ("Lynn").
2. As a result of taking the drug, Plaintiff TERRIE S. LANSFORD was injured.
3. Plaintiff's injuries resulted from Defendants' acts as follows:
 - a. Defendant Pfizer designed, manufactured, distributed and sold the drug at a time when it was defective.
 - b. Defendant Pfizer designed, manufactured, and distributed the drug at a time when Defendant knew or should have known that it was defective and unreasonably hazardous and that persons, including Plaintiff, were likely to be injured.
 - c. Defendant Lynn administered the drug at a time when it knew or should have known that it was defective and unreasonably hazardous and that persons, including Plaintiff, were likely to be injured.

d. Defendants failed to properly warn persons, including Plaintiff, of the defect or hazard at a time when Defendants knew or should have known that without such warning persons, including Plaintiff, were likely to be injured.

e. Defendants failed to obtain Plaintiff's proper informed consent for taking the drug. Full disclosure of the material risk of the drug or alternative treatments would have altered her decision to consent to the treatment.

4. As a result of Defendants' acts, Plaintiff suffered personal injuries, including the development of osteonecrosis, which are permanent, painful, progressive and disfiguring. When injured, Plaintiff TERRIE S. LANSFORD was 56 years of age with a life expectancy of 27.5 years. As a result of the injuries, Plaintiff has and will incur medical expense, has and will lose earnings, has and will suffer pain of mind and body, will be permanently disabled and disfigured and her earning capacity reduced, damaging here in an amount in excess of \$75,000.00.

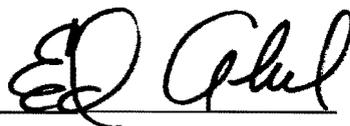
COUNT II

5. Plaintiff ALONZO LANSFORD for Count II repleads the allegations of Count I and states that he is the husband of Terrie S. Lansford, and as a further result of Defendants' acts, has and will be deprived of his wife's services, companionship and consortium, damaging him in an amount in excess of \$75,000.00.

COUNT III

6. For Count III, Plaintiffs replead and reallege the allegations of Counts I and II herein and state the acts of Defendants, and each of them, were gross, wanton, willful and intentional for which punitive damages should be assessed in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiffs pray judgment against Defendants in an amount in excess of \$75,000.00, together with interest and costs of this action.

A handwritten signature in black ink, appearing to read "Ed Abel", is written over a horizontal line.

ED ABEL, OBA #103
KELLY S. BISHOP, OBA #15159
ABEL LAW FIRM
600 One Leadership Square
211 N. Robinson
Oklahoma City, OK 73102
(405) 239-7046
(405) 272-1090 (fax)
ATTORNEYS FOR PLAINTIFFS

ATTORNEY LIEN CLAIMED