



**Service of Process  
Transmittal**

02/18/2022

CT Log Number 541078132

**TO:** Lauren Groblewski  
Abbott Laboratories  
100 ABBOTT PARK RD  
NORTH CHICAGO, IL 60064-3502

**RE: Process Served in Louisiana**

**FOR:** Abbott Laboratories (Domestic State: IL)

**ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:**

**TITLE OF ACTION:** Re: REGINALD BLANCHARD // To: Abbott Laboratories

**DOCUMENT(S) SERVED:** --

**COURT/AGENCY:** None Specified  
Case # 824983

**NATURE OF ACTION:** Product Liability Litigation - Personal Injury

**ON WHOM PROCESS WAS SERVED:** C T Corporation System, Baton Rouge, LA

**DATE AND HOUR OF SERVICE:** By Process Server on 02/18/2022 at 08:35

**JURISDICTION SERVED :** Louisiana

**APPEARANCE OR ANSWER DUE:** None Specified

**ATTORNEY(S) / SENDER(S):** None Specified

**ACTION ITEMS:** CT has retained the current log, Retain Date: 02/18/2022, Expected Purge Date: 02/23/2022

Image SOP

Email Notification, Danielle Barberis danielle.barberis@abbott.com

Email Notification, Lauren Groblewski lauren.lucy@abbott.com

Email Notification, Jennifer Curtis jennifer.curtis@abbott.com

**REGISTERED AGENT ADDRESS:** C T Corporation System  
3867 Plaza Tower Dr.  
Baton Rouge, LA 70816  
877-564-7529  
MajorAccountTeam2@wolterskluwer.com

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PARISH OF JEFFERSON

You are hereby summoned to comply with the demand contained in the PETITION FOR DAMAGES of which a true and correct copy accompanies this citation, or make an appearance either by filing a pleading or otherwise, in the 24th Judicial District Court in and for the Parish of Jefferson, State of Louisiana, within (21) CALENDAR days after the service hereof, under penalty of default.

This service was requested by attorney KARA H. SAMUELS and was issued by the Clerk of Court on the 8th day of February, 2022.

/s/ Donna G. Muscarello  
Donna G. Muscarello, Deputy Clerk of Court for  
Jon A. Gegenheimer, Clerk of Court

SERVICE INFORMATION

(101) CITATION: PETITION FOR DAMAGES ;

220208-9439-4

Received: \_\_\_\_\_ Served: \_\_\_\_\_ Returned: \_\_\_\_\_

Service was made:  
 Personal  Domiciliary \_\_\_\_\_

Unable to serve:  
 Not at this address  Numerous attempts \_\_\_\_\_ times  
 Vacant  Received too late to serve  
 Moved  No longer works at this address  
 No such address  Need apartment / building number  
 Other \_\_\_\_\_

Service: \$ \_\_\_\_\_ Mileage: \$ \_\_\_\_\_ Total: \$ \_\_\_\_\_

Completed by: \_\_\_\_\_ # \_\_\_\_\_

Parish of: \_\_\_\_\_  
Deputy Sheriff

**REGINALD BLANCHARD**  
**VERSUS**  
**ABBOTT LABORATORIES**

**FILED:** \_\_\_\_\_

\_\_\_\_\_  
**DEPUTY CLERK**

**PETITION FOR DAMAGES**

TO THE HONORABLE 24<sup>TH</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF JEFFERSON AND THE JUDGES THEREOF:

The original Petition for Damages of Reginald Blanchard, through undersigned counsel, respectfully represents:

**PARTIES**

1.

Petitioner, Reginald Blanchard, is of the full age of majority and is a resident of and domiciled in the Parish of Orleans, State of Louisiana.

2.

Made defendant herein is **ABBOTT LABORATORIES** ["Abbott"], a foreign corporation, which, at all times pertinent herein, was authorized to do and doing business within the State of Louisiana and within the jurisdiction of this Honorable Court.

**VENUE**

3.

Venue is proper in this judicial district pursuant to Louisiana Code of Civil Procedure article 74, as Mr. Blanchard's injuries and damages were sustained in the Parish of Jefferson, State of Louisiana.

4.

Defendant, Abbott Laboratories, is subject to personal jurisdiction in the State of Louisiana because, at all relevant times, it conducted substantial business in the State of Louisiana by placing products that it developed and manufactured into a stream of commerce

In August of 2015, Mr. Reginald Blanchard, had a “St. Jude DDD-R dual chamber” pacemaker device implanted due to complete heart block. According to Mr. Blanchard’s St. Jude Medical Cardiac Pacemaker Patient Identification Card, the pacemaker and pacing leads implanted in August of 2015 were: P/G—Model No. PM2240, Serial No. 7668717; RV-LEAD—Model No. 1948/52, Serial No. CPC024884; RA-LEAD—Model No. 1882TC/46, Serial No. CWE021017.

## 6.

On February 3, 2021, Mr. Blanchard had an echocardiogram (ECHO) performed at Ochsner Medical Center that revealed a mildly dilated left ventricle with moderate systolic dysfunction. Mr. Blanchard’s ejection fraction was noted to be 35%. The ECHO also showed that the inferoseptum, inferior, and inferolateral walls were severely hypokinetic with the remainder of the left ventricular walls being mildly hypokinetic, as well as mild diastolic dysfunction.

## 7.

On February 5, 2021, Mr. Blanchard presented to Dr. Olle Kjellgren who determined that in light of the pronounced wall motion abnormality, Mr. Blanchard should undergo coronary angiography.

## 8.

On February 9, 2021, Mr. Blanchard underwent coronary angiography, the results of which showed that the left anterior descending artery (“LAD”) had a mid 60% lesion, and the D1 a 50% stenosis; the left ventriculogram revealed the apex to be mildly dyskinetic and the inferior wall to be akinetic; and the ejection fraction was 35%. It was felt that Mr. Blanchard should be treated medically for his coronary artery disease, and it appeared likely that the wall motion abnormality and the left ventricular dysfunction were related to ventricular (“V”) pacing.

On February 25, 2021, Mr. Blanchard presented to Dr. Rogers for a consultation for his pacemaker and cardiomyopathy. An in-clinic device interrogation noted stable lead parameters with 13% right atrial (RA) and 99% right ventricular (RV) pacing. There was intermittent non-physiologic noise on the atrial lead that was reproduced with isometric arm movement. Dr. Rogers' interpretation of an in-clinic ECG was sinus rhythm with RV pacing (QRS duration 170ms). Dr. Rogers' plan following his evaluation of Mr. Blanchard was to perform a left arm venogram, if patent, and then schedule a CRT-P upgrade.

11.

On March 18, 2021, Mr. Blanchard underwent an attempted dual chamber upgrade to CRT-P/pocket revision; however, when the device and leads were exposed during the procedure, there were notable insulation breaks on the RV and RA leads of the "St. Jude DDD-R dual chamber" pacemaker. The procedure was aborted for planned extraction and reimplantation with upgrade to be arranged at a later date.

12.

On May 3, 2021, Mr. Blanchard underwent a pocket revision and total system extraction of his cardiac implantable device followed by reimplantation of CRT-P.

13.

According to the medical record, the original generator, RV lead, and RA lead were extracted during Mr. Blanchard's May 3, 2021, procedure. Upon information and belief, the device identified on Mr. Blanchard's St. Jude Medical Cardiac Pacemaker Patient Identification Card was returned to the manufacturer by Ochsner.

14.

Following the May 3, 2021 procedure, Mr. Blanchard began experiencing chest pains, and upon interrogation of his device, it was discovered that he had periods of noncapture during deep inspiration. On May 13, 2021, he underwent an RV lead revision.

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