

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BOBBY JO ROBICHAUX * CIVIL ACTION:
AND MARK ROBICHAUX *
Petitioners *

v. * JUDGE

* MAG. JUDGE

General Electric Co., GE Healthcare, Inc.,*
GE Healthcare Bio-Sciences Corp., *
Bayer Corp., Bayer Healthcare *
Pharmaceuticals, Inc., Tyco Healthcare, *
Tyco Healthcare, Ltd., Mallinckrodt, Inc. *
Bracco Diagnostics, Inc. *
Defendants *

* JURY TRIAL REQUESTED

COMPLAINT

PETITION FOR DAMAGES

Petitioners, Bobby Jo Robichaux and Mark Robichaux, though undersigned counsel, bring this Petition for Damages and allege as follows:

NATURE OF THE ACTION

1.

This is an action for personal injuries and economic damages suffered by Petitioners as a direct and proximate result of the Defendants' negligent and wrongful conduct in connection with the design, development, manufacturing, testing, packaging, promoting, marketing, distribution,

labeling and/or sale of gadolinium-based contrast agents (GBCAs) known as Magnevist, Gadavist, MultiHance, Omniscan, Dotarem, ProHance, OptiMARK, Eovist and Ablavar.

PARTIES

2.

Petitioners, Bobby Jo Robichaux and Mark Robichaux, are of the full age of majority and residents of and domiciled in the Parish of Lafourche, State of Louisiana.

3.

Defendants, General Electric Co., GE Healthcare, Inc., GE Healthcare Bio-Sciences Corp., Bayer Corp., Bayer Healthcare Pharmaceuticals, Inc., Tyco Healthcare, Tyco Healthcare, Ltd., Mallinckrodt, Inc. and Bracco Diagnostics, Inc. (collectively referred to as the “Manufacturing Defendants”), are corporations doing business within the State of Louisiana and within the jurisdiction of this Honorable Court.

JURISDICTION AND VENUE

4.

This Court has subject matter jurisdiction pursuant to 28 U.S.C. §1332(a)(1) because this case is a civil action where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between citizens of different States.

5.

Venue is properly set in this District pursuant to 28 U.S.C. §1391(b) since Defendants transacts business within this judicial district. Likewise, a substantial part of the events giving rise to the claim occurred within this judicial district.

6.

This court has personal jurisdiction over Defendants pursuant to and consistent with the

Constitutional requirements of Due Process in that Defendants, acting through their agents or apparent agents, committed one or more of the following:

- a. The transaction of any business within the state;
- b. The making of any contract within the state;
- c. The commission of a tortious act within this state; and
- d. The ownership, use, or possession of any real estate situated within this state.

7.

Requiring Defendants to litigate these claims in the State of Louisiana, Petitioners' home state does not offend traditional notions of fair play and substantial justice and is permitted by the United States Constitution. All of Petitioners' claims arise in part from conduct Defendants purposefully directed to Petitioners' home state.

8.

Defendants regularly conduct or solicit business and derive substantial revenue from goods used or consumed in, inter alia, the State of Louisiana, Petitioners' home state.

9.

At all relevant times Defendants transacted, solicited, and conducted business in Louisiana, Petitioners' home state and derived substantial revenue from such business.

10.

At all times relevant hereto Defendants expected or should have expected that its acts would have consequences within the United States of America, and in the State of Louisiana, Petitioners' home state in particular.

11.

At all relevant times, Defendants placed its product used by Petitioner into the stream of interstate commerce.

12.

Defendants named herein is conclusively presumed to have been doing business in this state and are subject to Louisiana's long arm jurisdiction.

13.

At all relevant times, Defendants expected or should have expected that their acts and omissions would have consequences within the United States and Louisiana.

14.

Petitioners' damages in this matter accrued in Louisiana.

FACTUAL CLAIMS OF PETITION FOR DAMAGES

15.

Defendants, are indebted unto Petitioners jointly and *in solido* for all sums as are reasonable, together with legal interest from the date of judicial demand until paid, for all costs of these proceedings, and for all other general and equitable relief as may be afforded by this Honorable Court, for the following reasons:

16.

On or about July 17, 2018, Petitioner was admitted to Leonard J. Chabert Medical Center and underwent a Lumbar Spine MRI with and without contrast, which was performed by Dr. Jessica Borne. Prior to the procedure, Petitioner was given an IV of various medications, including Gadodiamide solution 18 mL and an injection of gadodiamide (OMNISCAN) 5mmol/mL.

17.

On or about July 23, 2018, Petitioner was admitted to East Jefferson General Hospital, where she underwent an abdomen CT with IV contrast and a pelvis CT with IV contrast.

18.

After being administered the IV, plaintiff began suffering from an allergic reaction. Plaintiff has been re-admitted to the hospital several times due to ongoing complications from the IV dye.

19.

Petitioner, Bobby Jo Robichaux, alleges that GBCAs caused her severe, disabling, and disfiguring injuries to her entire body.

20.

Upon information and belief, the GBCAs produced by Manufacturing Defendants and used by Petitioner, is defective in its design or formulation in that it is not reasonably fit, suitable, or safe for its intended purpose and/or its foreseeable risks exceeded the benefits associated with its design and formulation.

21.

Upon information and belief, the GBCAs produced by Manufacturing Defendants and used by Petitioner was defective and unreasonably dangerous when it left the possession of Defendants in that it contained warnings insufficient to alert Petitioners and/or Petitioner's healthcare providers of the dangerous risks and reactions associated with the subject product.

22.

Upon information and belief, the GBCAs produced by Manufacturing Defendants and used by Petitioner was not fit for its intended purpose, was not of merchantable quality, did not conform to Defendants' express representations of its intended use because the GBCA was not safe, caused Petitioner serious side effects, and caused Petitioner severe and permanent injuries.

23.

Defendants, are also liable to Petitioners in redhibition inasmuch it sold a product to Petitioners containing a hidden defect which rendered the product unfit for ordinary use and so inconvenient that Petitioners would not have purchased the product had she known of the defect.

25.

Defendants are also liable to Petitioners for breach of warranty of fitness of ordinary use inasmuch it sold a product to Petitioners that was contaminated and/or defective, and not reasonably fit for its ordinary use.

26.

In addition to the above, and in the alternative thereto, the injuries, offenses, and damages suffered by Petitioner were caused by acts or omissions of Defendants which may be beyond proof by Petitioners herein; however, because the product was, at all times pertinent, within the exclusive control of the Defendants, there is no other possible conclusion than that Petitioners' damages resulted from the negligence of Defendants. Accordingly, Petitioner pleads the doctrine of *res ipsa loquitur*, and/or that Defendants is strictly liable for Petitioners' injuries and damages.

DAMAGES

27.

The conduct of Defendants directly and/or proximately caused Petitioner, Bobby Jo Robichaux, to suffer severe and painful personal injuries and damages, which presently include, but are not limited to:

- a. otherwise unnecessary medical treatment and all risks associated therewith;
- b. keen mental anguish, embarrassment, humiliation, and emotional distress;
- c. the need for medical monitoring;
- d. future medical problems not yet known or realized;
- e. past medical expenses;
- f. future medical expenses;
- g. loss of enjoyment of life;
- h. loss of earnings and/or earning capacity;
- i. attorneys' fees; and
- j. all other elements of damages and injuries, as may be shown at the trial of this matter.

28.

The conduct of Defendants directly and/or proximately caused Petitioner, Mark Robichaux, to suffer severe and painful personal injuries and damages, which presently include, but are not limited to:

- a. loss of consortium; and,
- b. all other elements of damages and injuries, as may be shown at the trial of this matter.

JURY TRIAL DEMAND

29.

Petitioner is entitled to, and request, a trial by jury.

WHEREFORE, Petitioners, Bobby Jo Robichaux and Mark Robichaux, pray that Defendants, General Electric Co., GE Healthcare, Inc., GE Healthcare Bio-Sciences Corp., Bayer Corp., Bayer Healthcare Pharmaceuticals, Inc., Tyco Healthcare, Tyco Healthcare, Ltd., Mallinckrodt, Inc. and Bracco Diagnostics, Inc., be served with a copy of this Petition for Damages, and that, after due proceedings, there be judgment herein in favor of Petitioners and against Defendants, for all damages as are reasonable, together with legal interest thereon from the date of judicial demand until paid, for all costs of these proceedings, including attorneys' fees, for all general and equitable relief, and for trial by jury.

Respectfully submitted,

/s/ John D. Sileo

JOHN D. SILEO (LA. BAR NO.: 17797)
CASEY W. MOLL (LA BAR NO.: 35925)
320 North Carrollton Avenue, Suite 101
New Orleans, Louisiana 70119
504-486-4343 (telephone)
504-297-1249 (facsimile)
jack@johnsileolaw.com
casey@johnsileolaw.com

/s/ J. Michael Daly, Jr.

J. Michael Daly, Jr., Bar No. 19539
3939 North Causeway Blvd .Suite 200
Metairie, Louisiana 70002
504-846-5700 (telephone)
504-846-5722 (facsimile)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Bobby Jo Robichaux and Mark Robichaux

(b) County of Residence of First Listed Plaintiff Lafourche (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

John D. Sileo, 320 N. Carrollton Ave. #101, New Orleans La 70119 504-486-4343

DEFENDANTS

General Electric Co., et al

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff, 2 U.S. Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 USC 1332(a)(1) Brief description of cause:

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE DOCKET NUMBER

DATE 01/23/2019 SIGNATURE OF ATTORNEY OF RECORD /s/John D. Sileo

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Company, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Bayer Corporation
Through their agent for service of process
Corporation Service Company
501 Louisiana Ave.
Baton Rouge, LA 70802

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo
Casey W. Mol
320 N. Carrollton Ave. Suite 101
New Orleans, LA 70119
jack@johnsileolaw.com/casey@johnsileolaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Company, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Bayer Healthcare Pharmaceuticals, Inc. Through their agent for service of process Corporation Service Company 501 Louisiana Ave. Baton Rouge, LA 70802

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo Casey W. Mol 320 N. Carrollton Ave. Suite 101 New Orleans, LA 70119 jack@johnsileolaw.com/casey@johnsileolaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

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UNITED STATES DISTRICT COURT

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Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Co., Inc.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Bracco Diagnostics
259 Prospect Plains Road
Building H
Monroe Township, NJ 08831

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo
Casey W. Moll
320 N. Carrollton Ave. Suite 101
New Orleans, LA 70119
504-486-4343
jack@johnsileolaw.com

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UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Company, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) GE Healthcare Bio Sciences Corp. Through their agent for service of process CT Corporation System 3867 Plaza Tower Drive Baton Rouge, La 70816

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo Casey W. Mol 320 N. Carrollton Ave. Suite 101 New Orleans, LA 70119 jack@johnsileolaw.com/casey@johnsileolaw.com

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UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Company, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) GE Healthcare, Inc. Through their agent for service of process CT Corporation System 3867 Plaza Tower Drive Baton Rouge, La 70816

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo Casey W. Mol 320 N. Carrollton Ave. Suite 101 New Orleans, LA 70119 jack@johnsileolaw.com/casey@johnsileolaw.com

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UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Co., Inc.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) General Electric Co. Through their agent for service of process CT Corporation System 3867 Plaza Tower Drive Baton Rouge, LA 70816

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo Casey W. Moll 320 N. Carrollton Ave. Suite 101 New Orleans, LA 70119 504-486-4343 jack@johnsileolaw.com

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UNITED STATES DISTRICT COURT

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Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Co., Inc.

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Mallinckrodt Inc.
675 McDonnell Boulevard
PO Box 5840
St. Louis MO 63042

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo
Casey W. Moll
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New Orleans, LA 70119
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UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Company, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Tyco Healthcare
Through their agent for service of process
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, LA 70802

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo
Casey W. Mol
320 N. Carrollton Ave. Suite 101
New Orleans, LA 70119
jack@johnsileolaw.com/casey@johnsileolaw.com

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CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

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was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

Bobby Jo Robichaux and Mark Robichaux

Plaintiff(s)

v.

General Electric Company, et al

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Tyco Healthcare, LTD
Through their agent for service of process
Corporation Service Company
501 Louisiana Avenue
Baton Rouge, LA 70802

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

John D. Sileo
Casey W. Mol
320 N. Carrollton Ave. Suite 101
New Orleans, LA 70119
jack@johnsileolaw.com/casey@johnsileolaw.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

I returned the summons unexecuted because _____ ; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: