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Civil Action No. *SD*

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

08 1060

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ZBIGNIEW MARCINCZYK and BOZENA BLUCHOWSKA,

Plaintiffs,

-against-

GENERAL ELECTRIC COMPANY; GE HEALTHCARE
a/k/a GENERAL ELECTRIC COMPANY
d/b/a GE HEALTHCARE; GE HEALTHCARE, INC. d/b/a
GE HEALTHCARE MEDICAL DIAGNOSTICS;
GE HEALTHCARE, AS and NOVATION, LLC,
Defendants.

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COMPLAINT AND JURY DEMAND

Plaintiffs, ZBIGNIEW MARCINCZYK and BOZENA BLUCHOWSKA, by and through their attorneys, DION & GOLDBERGER, for their Complaint against Defendants, states, alleges and avers as follows:

PARTIES, VENUE and JURISDICTION

1. Plaintiffs Zbigniew Marcinczyk and Bozena Bluchowska reside at 2027 Beyer Avenue, Apt. 1F, Philadelphia, Pennsylvania 19115.
2. Defendant General Electric Company is a New York corporation with its principal place of business at 3135 Easton Turnpike, Fairfield, Connecticut 06431. Defendant General Electric Company is a resident and citizen of both New York and Connecticut. Defendant General Electric Company is the parent company of Defendants GE Healthcare, GE Healthcare, Inc., and GE Healthcare AS.

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3. At all times relevant, Defendant General Electric Company was engaged in the business of designing, licensing, manufacturing, distributing, selling, marketing, and/or, introducing into interstate commerce, either directly or indirectly through third parties or related entities, the diagnostic agent Omniscan.

4. Defendant GE Healthcare, headquartered in the United Kingdom, is a unit of General Electric Company, and is also known as General Electric Company d/b/a GE Healthcare, and is also doing business as GE Healthcare Medical Diagnostics, which is headquartered in Princeton, New Jersey.

5. At all times relevant, Defendant GE Healthcare, a/k/a General Electric Company d/b/a GE Healthcare, was engaged in the business of designing, licensing, manufacturing, distributing, selling, marketing, and/or introducing into interstate commerce, either directly or indirectly through third parties or related entities, the diagnostic agent Omniscan.

6. Defendant GE Healthcare, Inc. is a Delaware corporation with its principal place of business at 101 Carnegie Center, Princeton, New Jersey. Defendant GE Healthcare, Inc. is a resident and citizen of both Delaware and New Jersey. Defendant GE Healthcare, Inc. is a subsidiary of General Electric Company.

7. At all times relevant, Defendant GE Healthcare, Inc. was engaged in the business of designing, licensing, manufacturing, distributing, selling, marketing, and/or, introducing into interstate commerce, either directly or indirectly through third parties or related entities, the diagnostic agent Omniscan.

8. Defendant GE Healthcare AS is a Norwegian corporation with its principal place of business in Norway. Defendant GE Healthcare AS is a subsidiary of General Electric Company.

9. At all times relevant, Defendant GE Healthcare AS was engaged in the business of designing, licensing, manufacturing, distributing, selling, marketing, and/or introducing into interstate commerce, either directly or indirectly through third parties or related entities, the drug Omniscan.

10. Defendant Novation, LLC is a Delaware corporation with its principal place of business at 127 East John Carpenter Freeway, Suite 1400, Irving, Texas. Defendant Novation, LLC is a resident and citizen of both Delaware and Texas. Defendant Novation, LLC is a subsidiary of VHA Inc.

11. At all times relevant, Defendant Novation, LLC was engaged in the business of labeling, licensing, distributing, selling, and marketing, either directly or indirectly through agents or third parties, the prescription drug Omniscan. This includes but is not limited to Defendant Novation, LLC's marketing of Omniscan under its private label called NOVAPLUS.

12. Defendants General Electric Company, GE Healthcare, GE Healthcare, Inc., GE Healthcare, AS and Novation, LLC will be collectively referred to in this Complaint as the "GE Defendants."

13. At all times relevant, the GE Defendants were engaged in the business of designing, licensing, manufacturing, distributing, selling, marketing, and/or introducing into interstate commerce, either directly or indirectly through third parties or related entities, the diagnostic agent Omniscan.

14. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. 1332. The amount in controversy exceeds seventy-five thousand dollars (\$75,000) exclusive of interest and costs.

15. The Court has personal jurisdiction over the Defendants by virtue of the Defendants' transacting business in or directed at Pennsylvania and its citizens and by commission of tortious acts that caused injury in Pennsylvania and by purposefully availing themselves of the benefits and privileges of Pennsylvania law by regular, continuous and systematic contacts with Pennsylvania.

16. Venue is proper in this district pursuant to 28 U.S.C. 1391.

GENERAL ALLEGATIONS

17. Omniscan is an injectable paramagnetic contrast agent used for magnetic resonance imaging and arteriography. It contains the metal gadolinium, which is highly toxic in its free state. Omniscan, the chemical name of which is gadolinium diethylenetriamine pentaacetic acid bismethylamide (gadodiamide),

is represented by the GE Defendants to be safely and effectively indicated for intravenous administration to facilitate the visualization of lesions with abnormal vascularity.

18. Representatives of University of Pennsylvania Hospital and Holy Redeemer Hospital, where Plaintiff was injected with gadolinium based contrast agent(s), have confirmed Omniscan was the used contrast agent(s) that was injected into Plaintiff.

19. At all times relevant hereto, the Defendants knew, or should have known, that in its free state, gadolinium is highly toxic, harmful, and dangerous to humans and causes severe physical injury, and Defendants knew, or should have known, of the need to prevent the gadolinium contained in their products from becoming free in the body of humans injected with Omniscan, through the use of, among other things, proper design, testing and manufacturing.

20. The linear chemical composition of Omniscan makes it easier for the toxic gadolinium to become free in the bodies of persons injected with this contrast agent.

21. At all relevant times, Defendants knew, or should have known, that there were safer, alternative designs for paramagnetic contrast agents, including non linear designs, that would prevent or minimize the risk of gadolinium becoming free in the bodies of humans and knew, or should have known, that there were safer, alternative designs for imaging systems, like those used by other leading MRI systems manufacturers, that do not use gadolinium based contrast agents, which would provide a safer imaging alternative for the public, including Plaintiff.

22. At all times relevant hereto, the GE Defendants knew, or should have known, that their respective product, Omniscan, was not reasonably fit, suitable or safe for its intended purpose and, specifically, that they were defective and unsafe for use in patients with renal insufficiency such as Plaintiff, and knew, or should have known, that the gadolinium contained in their products is highly toxic to humans, and knew, or should have known, about the significant health risk of administering

Omniscan, to patients with renal insufficiency, including, but not limited to, the risk of toxic gadolinium being released into the bodies of those patients, causing severe physical injury.

23. Zbigniew Marcinczyk was administered Omniscan, on or about September 2005 and December 2005.

24. After being administered Omniscan, gadolinium was released into his body, and the Plaintiff developed Nephrogenic Systemic Fibrosis (NSF), also known as Nephrogenic Fibrosing Dcmopathy (NFD).

25. NSF/NFD develops only in patients with renal insufficiency, such as the Plaintiff, who have been given an injection of a gadolinium based contrast agent such as Omniscan.

26. NSF/NFD is predominantly characterized by discoloration, thickening, tightening, and swelling of the skin within days or weeks after receiving an Omniscan injection. These fibrotic and edematous changes produce muscular weakness and inhibit flexion and extension of joints, resulting in contractures. NSF/NFD often progresses to painful inhibition of the ability to use the arms, legs, hands, feet, and other joints. The skin changes that begin as darkened patches or plaques progress to a "woody" texture and are accompanied by burning, itching, or severe pain in the areas of involvement. NSF/NFD also progresses to a fibrotic or scarring condition of other body organs such as the lungs, heart, liver, and musculature, and that can inhibit their ability to function properly and may lead to death. NSF/NFD is a progressive disease as to which there is no known cure.

27. The Plaintiff has suffered from severe, debilitating and worsening fibrotic changes to his body as a result of contracting NSF/NFD. This has permanently disfigured, impaired, physically impaired and disabled Plaintiff.

28. As a direct and proximate result of being administered Omniscan, the Plaintiff suffered serious, progressive, painful, permanent, incurable, and ultimately fatal injuries.

29. As a direct and proximate result of the Plaintiff being administered Omniscan, the Plaintiff

suffered economic damages, losses and expenses and non-economic damages, losses and expenses including, but not limited to, pain and suffering, impairment of his quality of life and emotional distress. These losses are permanent in nature.

FIRST CAUSE OF ACTION
Strict Products Liability
Defective Manufacturing

30. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

31. The GE Defendants are the manufacturers, designers, distributors, sellers, or suppliers of Omniscan.

32. The Omniscan, diagnostic agents manufactured, designed, sold, distributed, supplied and/or placed in the stream of commerce by Defendants were defective in their manufacture and construction when they left the hands of Defendants in that they deviated from product specifications, posing a serious risk of injury and death.

33. As a direct and proximate result of the Plaintiff being administered Omniscan, as manufactured, designed, sold, supplied and introduced into the stream of commerce by Defendants, Plaintiff suffered economic damages, losses and expenses and non-economic damages and losses, including, but not limited to, pain and suffering, impairment of his quality of life and emotional distress.

SECOND CAUSE OF ACTION
Strict Products Liability
Design Defect

34. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

35. The GE Defendants are the manufacturers, designers, distributors, sellers, or suppliers of Omniscan.

36. The Omniscan, diagnostic agents manufactured and supplied by Defendants were defective in design or formulation in that, when they left the hands of the Defendants, the foreseeable risks of the

products exceeded the benefits associated with their design or formulation, or it was more dangerous than an ordinary consumer would expect.

37. The foreseeable risks associated with the design or formulation of Omniscan, include, but are not limited to, the fact that the design or formulation of Omniscan, are more dangerous than a reasonably prudent consumer would expect when used in an intended or reasonably foreseeable manner.

38. Defendants knew, or should have known, that there were safer, alternative designs for paramagnetic contrast agents, including non linear designs, that would prevent or minimize the risk of gadolinium becoming free in the bodies of humans and knew or should have known that there were safer, alternative designs for imaging systems, like those used by other leading MRI systems manufacturers, that do not use gadolinium based contrast agents, which would provide a safer imaging alternative for the public, including Plaintiff.

39. As a direct and proximate result of the Plaintiff being administered Omniscan, as manufactured, designed, sold, supplied and introduced into the stream of commerce by Defendants, Plaintiff suffered economic damages and losses and non-economic damages and losses, including, but not limited to, pain and suffering, impairment of his quality of life and emotional distress.

THIRD CAUSE OF ACTION
Strict Products Liability
Defect Due to Inadequate Warning

40. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

41. The Omniscan, manufactured and supplied by the GE Defendants, respectively, were defective due to inadequate warning or instruction because Defendants knew, or should have known, that their products created significant, risks of serious bodily harm and death to consumers, and they failed to adequately warn persons who were administered these products and/or their health care providers of such risks.

42. The Omniscan diagnostic agents manufactured and supplied by Defendants were defective due to inadequate post-marketing warning or instruction because, after Defendants knew, or should have known, of the risk of serious bodily harm and death from the administration of Omniscan, defendants failed to provide an adequate warning to users of these products and/or their health care providers, knowing the products could cause serious injury and death.

43. As a direct and proximate result of the Plaintiff being administered Omniscan, as manufactured, designed, sold, supplied and introduced into the stream of commerce by the defendants, Plaintiff suffered economic damages and losses and non-economic damages and losses, including, but not limited to, grief, loss of companionship, pain and suffering, impairment of his quality of life and emotional distress.

FOURTH CAUSE OF ACTION
Strict Products Liability
Defect Due to Nonconformance with Representations

44. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

45. The GE Defendants are the manufacturers, designers, distributors, sellers or suppliers of Omniscan, and made representations regarding the character or quality of Omniscan, including representations that the Omniscan, diagnostic agents were safe.

46. The Omniscan, diagnostic agents manufactured and supplied by Defendants were defective in that, when they left the hands of Defendants, they did not conform to representations made by Defendants concerning their products.

47. Plaintiff, and/or, Plaintiff's health care providers justifiably relied upon Defendants' representations regarding the Omniscan diagnostic agents at the time those products were administered to him.

48. As a direct and proximate result of the Plaintiff being administered Omniscan, as manufactured, designed, sold, supplied and introduced into the stream of commerce by Defendants, Plaintiff suffered

economic damages and losses and non-economic damages and losses, including, but not limited to, grief, loss of companionship, pain and suffering, impairment of his quality of life and emotional distress.

FIFTH CAUSE OF ACTION
Strict Products Liability
Defect Due to Failure to Adequately Test

49. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

50. Defendants advised consumers and the medical community that Omniscan, was safe for use. Defendants failed to adequately test Omniscan, with respect to their use by consumers with renal insufficiency.

51. Had Defendants adequately tested the safety of Omniscan, for use by consumers with renal insufficiency and disclosed those results to the medical community or the public, the Plaintiff would not have been administered Omniscan.

52. As a direct and proximate result of Plaintiff being administered Omniscan, as manufactured, designed, sold, supplied and introduced into the stream of commerce by Defendants, Plaintiff suffered economic damages and losses and non-economic damages and losses, including, but not limited to, disfigurement, permanent impairment, pain and suffering, impairment of quality of life and emotional distress.

SIXTH CAUSE OF ACTION
Strict Liability in Tort

53. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

- (a) Defendants used and controlled toxic gadolinium for injection in humans.
- (b) Gadolinium is highly toxic, inherently dangerous, and ultra-hazardous to humans.
- (c) Defendants allowed and directed that toxic gadolinium be used and injected in humans.

54. As a direct and proximate result of Defendants' use and control of toxic gadolinium, toxic

gadolinium was injected and released into the body of the Plaintiff and, as a result, he suffered serious physical injury, harm, damages and economic loss. As a result thereof, Plaintiff has suffered, and will suffer in the future, economic damages and losses and non-economic damages and losses, including, but not limited to, disfigurement, physical impairment, pain and suffering, impairment of his quality of life and emotional distress.

55. Defendants are strictly liable for Plaintiff's injuries, damages and losses.

SEVENTH CAUSE OF ACTION
Negligence - Highest Possible Duty of Care

56. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

57. Because gadolinium is highly toxic and inherently dangerous and ultra-hazardous to humans, Defendants had a duty to exercise the highest possible degree of care in the design, manufacture, sale and/or distribution of Omniscan diagnostic agents into the stream of commerce, including the duty to assure that their products did not pose a significantly increased risk of bodily harm and adverse events.

58. Defendants failed to exercise the highest possible degree of care in the design, formulation, manufacture, sale, testing, quality assurance, quality control, labeling, marketing, and distribution into interstate commerce of Omniscan, in that Defendants knew, or should have known, that their products were inherently dangerous and ultra-hazardous to humans and caused such significant bodily harm or death and was not safe for administration to consumers.

59. Defendants also failed to exercise the highest possible degree of care in the labeling of Omniscan and failed to issue to consumers and/or their health care providers adequate warnings of the risk of serious bodily injury or death due to the use of Omniscan.

60. Despite the fact that Defendants knew or should have known that Omniscan posed a serious risk of bodily harm to consumers and was inherently dangerous and ultra-hazardous to humans and particularly

those with renal insufficiency, Defendants continued to manufacture and market Omniscan, for administration to magnetic resonance imaging and arteriography patients with renal insufficiency.

61. Defendants know, or should have known, that consumers such as the Plaintiff would foreseeably suffer injury as a result of Defendants' failure to exercise the highest possible degree of care as described above.

62. As a direct and proximate result of Defendants' negligence, Plaintiff suffered economic damages and losses and non-economic damages and losses, including, but not limited to, pain and suffering, disfigurement, impairment of his quality of life and emotional distress.

EIGHTH CAUSE OF ACTION

Negligence

63. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

64. Defendants had a duty to exercise reasonable care in the design, manufacture, sale and/or distribution of Omniscan, into the stream of commerce, including a duty to assure that their product did not pose a significantly increased risk of bodily harm and adverse events.

65. Defendants failed to exercise reasonable care in the design, formulation, manufacture, sale, testing, quality assurance, quality control, labeling, marketing, and distribution into interstate commerce of Omniscan, in that Defendants knew, or should have known, that the product caused such significant bodily harm or death and was not safe for administration to consumers.

66. Defendants also failed to exercise ordinary care in the labeling of Omniscan and failed to issue to consumers and/or their health care providers adequate warnings of the risk of serious bodily injury or death due to the use of Omniscan.

67. Despite the fact that Defendants knew, or should have known, that Omniscan posed a serious risk of bodily harm to consumers, Defendants continued to manufacture and market Omniscan for administration to magnetic resonance imaging and arteriography patients with renal insufficiency.

68. Defendants knew, or should have known, that consumers such as the Plaintiff would foreseeably suffer injury as a result of Defendants' failure to exercise ordinary care as described above.

69. As a direct and proximate result of Defendants' negligence, Plaintiff suffered economic damages and losses and non-economic damages and losses, including, but not limited to, disfigurement, physical impairment, pain and suffering, impairment of his quality of life and emotional distress.

NINTH CAUSE OF ACTION
Breach of Express Warranty

70. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

71. The GE Defendants expressly warranted that their products, Omniscan respectively, were safe and effective paramagnetic contrast agents for magnetic resonance imaging.

72. The Omniscan manufactured and sold by Defendants did not conform to these express representations because they caused serious injury when administered in recommended dosages.

73. As a direct and proximate result of Defendants' breach of warranty, Plaintiff suffered economic damages and losses and non-economic damages and losses, including, but not limited to, disfigurement, physical impairment, pain and suffering, impairment of his quality of life and emotional distress.

TENTH CAUSE OF ACTION

Breach of Implied Warranty

74. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

75. At the time Defendants designed, manufactured, marketed, sold, and distributed Omniscan, Defendants knew of the use for which Omniscan was intended and impliedly warranted their respective products to be of merchantable quality and safe for such use.

76. Plaintiff reasonably relied upon the skill and judgment of Defendants as to whether Omniscan was

of merchantable quality and safe for their intended use and upon Defendants' implied warranty as to such matters.

77. Contrary to such implied warranty, the Omniscan diagnostic agents were not of merchantable quality or safe for their intended use because these products were unreasonably dangerous as described herein.

78. As a direct and proximate result of Defendants' breach of warranty, Plaintiff suffered economic damages and losses and non-economic damages and losses, including, but not limited to, disfigurement, physical impairment, pain and suffering, impairment of his quality of life and emotional distress.

ELEVENTH CAUSE OF ACTION
Fraudulent Misrepresentation

79. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

80. The GE Defendants knowingly and intentionally made material and false and misleading representations to the Plaintiff and Plaintiff's physicians and to the public that their products, Omniscan was safe for use and that Defendants' labeling, marketing and promotion fully described all known risks of those products. Specifically, the Defendants concealed or knowingly failed to advise consumers concerning the risk that highly toxic gadolinium would be released into the bodies of persons with renal insufficiency who were administered the product when they knew or should have known of that fact.

81. Defendants' representations were in fact false, as Omniscan, is not safe for use, and their labeling, marketing and promotion did not fully describe all known risks of those products, including the risk that highly toxic gadolinium would be released into the bodies of persons with renal insufficiency who were administered the product.

82. Defendants had actual knowledge based upon studies, published reports and clinical experience that their product, Omniscan, created an unreasonable risk of serious bodily injury and death to consumers, or

should have known such information.

83. Defendants knowingly and intentionally omitted this information in their products' labeling, marketing and promotion and, instead, labeled, promoted and marketed their products as safe for use in order to avoid monetary losses and in order to sustain profits in their sales to consumers.

84. When Defendants made these representations that Omniscan was safe for use, they knowingly and intentionally concealed and withheld from the Plaintiff, Plaintiff's physician and the public, the true facts that Omniscan diagnostic agents are not safe for use in consumers with renal insufficiency.

85. Defendants had a duty to disclose to the Plaintiff, Plaintiff's physicians and the public that Omniscan was not safe for use in patients with renal insufficiency in that they cause NSF/NFD because they had superior knowledge of these facts that were material to Plaintiff and Plaintiff's physician's decision to use Omniscan. Plaintiff and Plaintiff's physician reasonably and justifiably relied on the Defendants' concealment of the true facts and reasonably and justifiably relied upon Defendants' representations to Plaintiff or Plaintiff's health care providers that the Omniscan diagnostic agents were safe for human consumption and/or use and that Defendants' labeling, marketing and promotion fully described all known risks of the product.

86. Had Plaintiff and Plaintiff's physician known of Defendants' concealment of the true facts that Omniscan was not safe for human use, the Plaintiff would not have been administered Omniscan.

87. As a direct and proximate result of Defendants' misrepresentations and concealment, Plaintiff was administered Omniscan, and as a result, Plaintiff suffered economic damages and losses and non-economic damages and losses, including, but not limited to, pain and suffering, disfigurement, impairment of his quality of life and emotional distress.

**TWELFTH CAUSE OF ACTION
Negligent Misrepresentation**

88. Plaintiff hereby incorporates by reference, as if fully set forth herein, each and every allegation set forth in the preceding paragraphs and further alleges as follows:

89. Defendants, in the course of their business profession, supplied Plaintiff and Plaintiff's physician with false information for guidance in their decision to use Omniscan.

90. The false information supplied by Defendants to Plaintiff and Plaintiff's physician was that Omniscan, was safe and would not adversely affect Plaintiff's health, and in particular, the Defendants failed to advise the Plaintiff and Plaintiff's physician of the risk that highly toxic gadolinium would be released into the bodies of persons with renal insufficiency who were administered the product.

91. In supplying the false information, Defendants failed to exercise reasonable care or competence in obtaining or communicating information to Plaintiff and Plaintiff's physician.

92. The false information obtained and communicated by Defendants to Plaintiff and Plaintiff's physician was material, and Plaintiff and Plaintiff's physician justifiably relied in good faith on the information given to them.

93. As a result of the negligent misrepresentations of Defendants, Plaintiff suffered injuries, damages and losses as alleged herein.

THIRTEENTH CAUSE OF ACTION
Loss of Consortium

94. Plaintiff, BOZENA BLUCHOWSKA alleges and readopts paragraphs 1-29 as though fully set forth herein and alternatively and/or concurrently states:

95. As a further direct and proximate cause of the above-described negligence of all of the Defendants, Plaintiff, BOZENA BLUCHOWSKA, has suffered and will continue to suffer for the indefinite future, the loss of her husband's society, services, consortium and support.

WHEREFORE, Plaintiffs pray for relief as follows:

Compensatory damages in excess of the jurisdictional amount, including, but not limited to, pain, suffering, emotional distress, loss of enjoyment of life, emotional distress, disfigurement, physical impairment and other non-economic damages in an amount to be determined at trial of this action; Expenses, income, and other economic damages in an amount to be determined at trial of this action; pre-and post-judgment interest; Attorneys' fees, expenses, and costs of this action as allowed by law; and such other and further relief as this Court deems necessary, just and proper.

JURY DEMAND

Plaintiffs hereby demands a trial by jury on all issues so triable.

Respectfully submitted this 29th day of February, 2008.

Dion & Goldberger,

By: Benson L. Goldberger

Benson Goldberger

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Viti, Gina

From: Rosenthal, Fred
Sent: Tuesday, March 04, 2008 12:57 PM
To: Viti, Gina
Subject: FW: Activity in Case 2:08-cv-01060-SD MARCINCZYK et al v. GENERAL ELECTRIC C...

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From: Massimo, Audra
Sent: Tuesday, March 04, 2008 12:16 PM
To: Rosenthal, Fred
Subject: FW: Activity in Case 2:08-cv-01060-SD MARCINCZYK et al v. GENERAL ELECTRIC C...

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From: BGOLDBERGERLAW@aol.com [mailto:BGOLDBERGERLAW@aol.com]
Sent: Tuesday, March 04, 2008 12:12 PM
To: Massimo, Audra
Subject: Fwd: Activity in Case 2:08-cv-01060-SD MARCINCZYK et al v. GENERAL ELECTRIC C...

From: ecf_paed@paed.uscourts.gov
To: paedmail@paed.uscourts.gov
Sent: 3/3/2008 2:18:45 P.M. Eastern Standard Time
Subj: Activity in Case 2:08-cv-01060-SD MARCINCZYK et al v. GENERAL ELECTRIC COMPANY et al Complaint

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United States District Court

Eastern District of Pennsylvania

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Case Number: 2:08-cv-1060
Filer: ZBIGNIEW MARCINCZYK
BOZENA BLUCHOWSKA

Document Number: 1

Docket Text:

COMPLAINT against all defendants (Filing fee \$ 350 receipt number 946443.), filed by ZBIGNIEW MARCINCZYK, BOZENA BLUCHOWSKA.(ks,)

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BENSON I. GOLDBERGER bgoldbergerlaw@aol.com, benwoowaha@aol.com

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