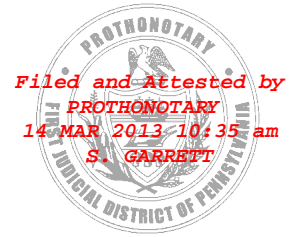


**SHELLER, P.C.**

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*Attorneys for Plaintiff(s)*

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<b>IN RE: RISPERDAL® LITIGATION</b>	:	<b>PHILADELPHIA COUNTY</b>
<b>March Term 2010, No. 296</b>	:	<b>COURT OF COMMON PLEAS</b>
-----	:	<b>TRIAL DIVISION</b>
	:	
WC, et al.,	:	
	:	<b>MARCH TERM, 2013</b>
Plaintiff(s),	:	
	:	<b>No. _____</b>
v.	:	
	:	
Janssen Pharmaceuticals, Inc., Johnson & Johnson	:	
Company, Johnson & Johnson Pharmaceutical	:	
Research and Development, L.L.C., Excerpta	:	
Medica, Inc., and Elsevier Inc.,	:	
	:	
Defendants.	:	

----- X  
**NOTICE TO PLEAD**

**NOTICE** You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney

**AVISO** Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las paginas siguientes, tiene veinte (20) dias a partir de recibir esta demanda notificacion para entablar personalmente o por un abogado una

and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. **PHILADELPHIA COUNTY BAR ASSOCIATION** LAWYER REFERRAL AND INFORMATION SERVICE 1101 MARKET STREET, 11<sup>TH</sup> FLOOR PHILADELPHIA, PENNSYLVANIA 19107 TELEPHONE: (215) 238-1701

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

comparencia escrita y tambien para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted sin previo aviso para conseguir el deniro demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiendad u otros derechos importantes para usted.

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO) VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO.

**ASOCIACION DE LICENCIADOR DE PHILADELPHIA** VICIO DE REFERENCIA DE INFORMACION LEGAL 1101 MARKET STREET, 11<sup>TH</sup> FLOOR PHILADELPHIA, PENNSYLVANIA 19107 TELEFONO: (215) 238-1701

SI USTED NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO, ESTA OFICINA PUEDE PROPORCION INFORMACION COBRE AGENCIAS QUE OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOSE REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN HONORARIO.

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**IN RE: RISPERDAL® LITIGATION** : **PHILADELPHIA COUNTY**  
**March Term 2010, No. 296** : **COURT OF COMMON PLEAS**  
----- : **TRIAL DIVISION**  
WC, et al., :  
:  
Plaintiff(s), : **MARCH TERM, 2013**  
:  
v. : **No. \_\_\_\_\_**  
:  
Janssen Pharmaceuticals, Inc., Johnson & Johnson :  
Company, Janssen Pharmaceutical Research and :  
Development, L.L.C., Excerpta Medica, Inc., and :  
Elsevier Inc., :  
:  
Defendants. :  
:  
----- X

**ABBREVIATED INDIVIDUAL COMPLAINT FOR  
RISPERDAL LITIGATION AND ADOPTION BY REFERENCE**

1. Plaintiff(s) incorporate by reference Plaintiffs’ Amended Master Long Form Complaint in *In Re: Risperdal Litigation* in the Philadelphia County Court of Common Pleas, filed as of September 3, 2010, under Docket Number March Term 2010, No. 296, and currently pending before the Honorable Arnold L. New.

2. Plaintiff(s) selects and indicates by checking off the appropriate spaces, those products and claims that are specific to his or her case. Where certain claims require, pursuant to Pennsylvania law, specific pleading or case specific facts and individual information, Plaintiff(s) shall add and include them herein.

3. Plaintiff WC (hereinafter referred to as “Plaintiff”)<sup>1</sup> is an individual who resides at 90 Sharpe Street, Kingston in the state of Pennsylvania.

4. Plaintiff claims the following antipsychotic medications caused his or her injury:

RISPERDAL     X      
RISPERDAL CONSTA \_\_\_\_\_  
INVEGA \_\_\_\_\_  
INVEGA SUSTENNA \_\_\_\_\_

5. Plaintiff claims to have suffered the following injury(ies) as a result of ingesting Risperdal, Risperdal Consta and/or Invega:

<b>Injury</b>	<b>Risperdal and/or Risperdal Consta</b>	<b>Invega and/or Invega Sustenna</b>
Gynecomastia	X	

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<sup>1</sup> In answering the following questions, the term “Plaintiff” refers to the party who alleges that they were injured, including a decedent who is represented by an administrator or a minor who is represented by a parent or guardian.

Galactorrhea		
Pituitary Tumors		
Microadenomas of the Pituitary Gland		
Breast Cancer		
Osteoporosis		
Decreased Bone Mineral Density		
Metabolic Syndrome		
Dyslipidemia		
Hypertension		
Diabetes Mellitus		
Diabetic Ketoacidosis (DKA)		
Hyperosmolar coma		
Hyperglycemia		
Glucose Dysregulation		
Insulin Insufficiency		
Insulin Resistance		
Pancreatitis		
Tardive Dyskinesia (TD)		
Extrapyramidal Symptoms		
Involuntary Movement Disorders		
Dyskinesia		

Dystonia		
Akathisia		
Parkinsonism		
Neuroleptic Malignant Syndrome (NMS)		
Other: Weight Gain	X	

6. Plaintiff purchased and/or otherwise obtained Risperdal and/or Risperdal Consta, which Plaintiff ingested from approximately 1999 through 2010.

7. Plaintiff purchased and/or otherwise obtained Invega and/or Invega Sustenna, which Plaintiff ingested from \_\_\_\_\_ to \_\_\_\_\_.

8. Plaintiff claims damages as a result of:

  X   Personal Injury to himself, herself or the person represented

  X   Economic Loss

9. Plaintiff's spouse, \_\_\_\_\_ (hereinafter referred to as "Spouse"), is an adult individual residing at \_\_\_\_\_ in the State of \_\_\_\_\_, and claims damages as a result of:

       Loss of Consortium, date of marriage: \_\_\_\_\_.

10. Plaintiff's parent and/or guardian, Michelle Cirba (hereinafter referred to as "Guardian"), is an adult individual residing at 90 Sharpe Street, Kingston in the state of Pennsylvania and claims damages as a result of medical expenses incurred and/or to be incurred in an effort to treat Plaintiff's injuries.

11. The following claims asserted in the Amended Master Complaint and the allegations with regard thereto in the Amended Master Complaint are herein adopted by reference:

- Count I: Negligence
- Count II: Negligence – Design Defect
- Count III: Fraud
- Count IV: Strict Product Liability – Failure to Warn
- Count V: Strict Product Liability – Design Defect
- Count VI: Breach of Express Warranty
- Count VII: Breach of Implied Warranty
- Count VIII: Violation of Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. § 201-1 *et seq.*
- Count IX: Unfair and Deceptive Trade Practices
- Count X: Conspiracy
- Count XI: Punitive Damages
- Count XII: Medical Expenses Incurred by Parent
- Count XIII: Loss of Consortium

Plaintiff(s) asserts the following additional theories of recovery against Defendants: \_\_\_\_\_

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\*Attach additional pages.

Respectfully submitted,

**SHELLER, P.C.**

Dated: March 14, 2013

By: /s/ Brian J. McCormick, Jr.  
Stephen A. Sheller, Esquire  
Jamie L. Sheller, Esquire  
Brian J. McCormick, Jr., Esquire

Attorneys for Plaintiff

**DEMAND FOR JURY TRIAL**

Demand is hereby made for trial by jury.

/s/ Brian J. McCormick, Jr.  
Stephen A. Sheller, Esquire  
Jamie L. Sheller, Esquire  
Brian J. McCormick, Jr., Esquire  
Plaintiff's counsel

Dated: March 14, 2013



## VERIFICATION

I, Brian J. McCormick, Jr., attorney for Plaintiff(s), verify that the statements of fact contained in the foregoing Short-Form Complaint are true and correct to the best of my knowledge, information and belief. I understand that statements herein are made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsifications to authorities.

Date: March 14, 2013

/s/ Brian J. McCormick, Jr.  
BRIAN J. MCCORMICK, JR.