

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

_____)	
Glenn Ford,)	
)	
Plaintiff,)	Civil Action No.
)	
v.)	
)	
Warden Burl Cain, Warden Ross Maggio,)	
Warden John Whitley, Warden Peabody,)	COMPLAINT
Warden Robert Hilton Butler,)	AND JURY DEMAND
Warden Frank C. Blackburn,)	
Warden Darrel Vannoy, Prison Official Does 1-10,)	
Doctor Cassidy, Doctor Macmurdo, Doctor Collins,)	
Doctor Demars, Doctor Sparks, Doe Doctors 1-10,)	
and ABC Insurance Companies 1 – 10,)	
)	
Defendants.)	
_____)	

COMPLAINT

Plaintiff Glenn Ford, by and through his attorneys, alleges the following against the above-listed Defendants:

I. INTRODUCTION

1. In 1984, Glenn Ford was convicted of a murder he did not commit.

2. Plaintiff Glenn Ford spent 29 years, 3 months, and 5 days in solitary confinement on death row for a crime he did not commit. He was confined to a single cell, and spent twenty-three hours a day in that cell.

3. In 1998, while he was incarcerated at the Louisiana State Penitentiary at Angola (“Angola”), a tendon popped in Ford’s left knee and his joint swelled up substantially. Defendants gave Ford no medical treatment besides Tylenol and a bandage.

4. In approximately 2001, Ford experienced severe stomach pain at Angola, and was told he had a “nervous stomach” and ignored. Only when his skin turned ash brown and he lost substantial weight over the next three months did Defendants give him any medical care – which by that point required surgical removal of his entire gallbladder.

5. Even after that experience, the next time Ford began to experience persistent flu-like symptoms and unexplained weight fluctuation towards the end of his period of incarceration, he was ignored again – Defendants told him he has “a thyroid problem” but gave him no treatment for a thyroid condition. It turned out to be a serious, untreated stomach infection.

6. In approximately 2011, Defendants discovered indicators of cancer in Ford’s blood, but ignored the warning signs and provided him no cancer treatment. They refused his attempts to see an oncologist, even after Defendants recommended that he see an oncologist.

7. Defendants used a policy at Angola of disciplining inmates when they complain about medical symptoms, are taken to the hospital, and the doctor says there is nothing wrong with them (which is usually what happens). In this event, they are taken to a punishment room called “the dungeon.” Inmates are also assessed a fee each time they go on a medical call out.

8. On March 10, 2014, Glenn Ford was exonerated on the basis of secret, still not publicly revealed information, nearly thirty years after he was arrested. He was the longest-serving death row inmate in the United States.

9. Ford was released from Angola the next day; within months he was diagnosed with Stage Three lung cancer. At the time of the filing of this Complaint, Ford's cancer has progressed to Stage Four.

10. As a direct result of Defendants' intentional, bad faith, willful, wanton, reckless, and/or deliberately indifferent acts and omissions, Glenn Ford sustained injuries and damages including pain and suffering, severe mental anguish, emotional distress, inadequate medical care, humiliation, indignities and embarrassment, degradation, and others.

11. This civil action seeks money damages and other relief for these extraordinary injuries and losses suffered by Glenn Ford at the hands of Defendants.

II. PARTIES

12. Plaintiff Glenn Ford ("Ford") is currently an adult resident of New Orleans, Louisiana. During the period of his incarceration, Mr. Ford was an inmate at the Louisiana State Penitentiary at Angola, in unincorporated West Feliciana Parish, east central Louisiana.

13. Defendant Wardens Burl Cain, Ross Maggio, John Whitley, Peabody, Robert Hilton Butler, Frank C. Blackburn, Vannoy, and Prison Official Does 1-10 were, at relevant times herein, wardens, assistant wardens, or officials of the Louisiana State Penitentiary at Angola where Ford was incarcerated and provided inadequate medical diagnosis and treatment. They are being sued in their individual capacities as final policy and decisionmakers, supervisors of subordinates, and persons in charge of hiring and contracting.

14. Defendant Doctors Cassidy, Macmurdo, Collins, Demars, Sparks, and Doe Doctors 1-10 were, at relevant times herein, doctors or alleged doctors who provided inadequate medical diagnosis and treatment to Ford. They are being sued in their individual capacities.

15. Defendants ABC Insurance Companies 1 – 10 are as yet unknown insurance companies, who, upon information and belief, have issued and currently have in effect one or more policies of insurance covering one or more of the Defendants named herein.

16. At all relevant times herein, all Defendants were “persons” for purposes of 42 U.S.C. Section 1983 and acted under color of law to deprive plaintiff Ford of his constitutional rights, as set forth more fully below. Their constitutional violations and other acts were the proximate cause of the injuries and consequent damages sustained by Ford.

17. To the extent that any of the Defendants described above is deceased, this lawsuit is an action against their estate.

III. JURISDICTION AND VENUE

18. This is a civil rights action brought under the laws of the United States, including 42 U.S.C. § 1983 et seq. Jurisdiction is conferred on this Court pursuant to 28 U.S.C. §§ 1331 (federal question) and 1343 (civil rights). Supplemental jurisdiction of the Court over the claims arising under state law is invoked pursuant to 28 U.S.C. § 1367 (supplemental jurisdiction).

19. Venue in the Middle District of Louisiana is proper under 28 U.S.C. § 1391(b) because many of the parties reside, or, at the time the events took place, resided in this judicial district, and a substantial part of the events giving rise to the claims asserted herein occurred here as well.

IV. FACTUAL ALLEGATIONS

The Investigation of the Murder of Isadore Rozeman

20. On the afternoon of November 5, 1983, Isadore Rozeman was found dead in his jewelry and watch repair shop in Shreveport, Louisiana. He was shot once in the back of the head with a .38 caliber bullet. There were no eyewitnesses to the crime, but it appeared that items had been stolen from the display cases.

21. Ford's name was first raised by Mr. Rozeman's neighbors, who told Shreveport police that Mr. Ford did yard work for Mr. Rozeman and that they recalled seeing him the day of the murder. After an initial interview, Mr. Ford agreed to be fingerprinted, photographed and tested for gunshot residue. He also consented to a search of his room. A detective described Mr. Ford as being "very cooperative." Ford helped the police identify and locate the actual killers, Jake and Henry Robinson.

22. On February 9, 1984, Shreveport detectives interviewed one of the actual killers' girlfriend. According to the detectives, she implicated Ford in the murder.

23. Mr. Ford was charged later that day with the murder of Mr. Rozeman.

24. On March 21, 1984, an indictment was returned against Ford, the Robinson brothers, and a fourth man named George Starks.

25. In contrast to Mr. Ford's cooperation in the investigation, when the police attempted to arrest Jake Robinson, it led to a high-speed car chase. Henry Robinson fled the state and was ultimately arrested in San Diego, California.

The Trial of Glenn Ford

26. Despite the fact that the Robinson brothers were known drug dealers, were wanted for numerous other crimes, and had a reputation for violence, it was Ford who the District Attorneys prosecuted as the gunman in the murder of Isadore Rozeman.

27. Mr. Ford's trial began on November 26, 1984, and was based entirely on circumstantial evidence. (*State v. Ford*, 489 So.2d 1250, 1268 (La. 1986) (Calogero, J., dissenting) ("This defendant's conviction rests entirely on circumstantial evidence").

28. Mr. Ford's arrest for murder may have been precipitated by the alleged statement of Robinson's girlfriend, but soon after she was placed on the stand, her credibility unraveled. She was questioned about numerous inconsistencies contained in her statements to police. In response, she said that her entire statement was a lie and insisted that the detectives had fabricated some of her responses.

29. Nevertheless, the District Attorneys were able to convict Ford on the basis of circumstantial evidence, fabricated evidence, and various forms of prosecutorial misconduct, including surprising the defense with a changed time-of-death that eviscerated Ford's (true) alibi.

30. At the conclusion of the penalty phase, the jury deliberated for two and one-half hours before returning its recommendation for a death sentence. After a Motion for New Trial was denied, Mr. Ford was sentenced to death on February 26, 1985.

31. For reasons that have never been revealed, the State dropped the charges against Henry Robinson, Jake Robinson, and Lorenzo Starks after Ford was convicted. The Robinson brothers remained free and are suspected of killing four additional people after the murder of Mr. Rozeman.

32. While in prison, Ford suffered from a number of objectively serious medical issues that were treated with deliberate indifference by Defendants, including a ruined knee, a gallbladder infection, a serious stomach infection, and finally, terminal cancer.

The Exoneration and Release of Glenn Ford

33. On March 10, 2014, the State filed a Motion to Vacate the Conviction and the Sentence of Glen Ford, explaining that “credible evidence” had become known to First Assistant District Attorney Dale G. Cox and Assistant District Attorney Catherine Estopinal in late 2013 which “support[ed] a finding that Ford was neither present at, nor a participant in, the robbery and murder of Isadore Rozeman.” In the motion, the State claimed that “if the information had been within the knowledge of the State [during the investigation], Ford might not even have been arrested or indicted for this offense.”

34. The Motion to Vacate did not explain what the “credible evidence” is, nor did it provide any substantiation of the date of its discovery.

35. The same day, Judge Ramona Emanuel signed an order granting the State’s Motion to Vacate the Conviction and the Sentence of Glen Ford and ordered him to be “unconditionally released from the custody of the Louisiana Department of Corrections.”

36. On March 11, 2014, Glenn Ford walked out of prison. He was, until that day, the longest-serving death row inmate in the United States. He had spent 29 years, 3 months, and 5 days in solitary confinement on death row for a crime he did not commit.

37. On June 10, 2014, the State dropped all charges against Ford.

38. Although Ford is out of prison, he is not free. Due to his diagnosed terminal lung cancer, Ford says that he “still feels like he is under the death penalty.”

V. **LEGAL CLAIMS**

Count 1
**(Claim for Inadequate Medical Treatment Under 42 U.S.C. § 1983
Against All Defendants)**

39. Plaintiff realleges all of the above as though fully set forth herein.

Ford's Ignored and Untreated Lung Cancer

40. Towards the end of his incarceration at Angola, in approximately 2011, a test revealed a cancer-indicating marker in Ford's blood.

41. Defendants promised Ford that they would schedule an appointment with an oncologist.

42. Over many months, Ford requested to see the oncologist, but was told that there was a 500 person waiting list.

43. Glenn told Warden Vannoy about the situation with the oncologist.

44. Over a period of nine months at that time, Ford dropped from 234 pounds to 204 pounds. He reported this to Defendants.

45. He reported to Defendants often felt nauseated after eating even a small amount of food and had to stop eating. He felt a burning in his stomach for days afterwards.

46. Ford requested Ensure from Defendants to supplement his diet because he was worried about his weight loss. Defendants denied the request.

47. At no time during his incarceration at Angola did Defendants provide Ford with chemotherapy, radiation treatment, or any other cancer treatment.

48. Defendants never scheduled the promised appointment with an oncologist for Ford, nor did they ever allow Ford to see an oncologist while he was incarcerated.

49. Shortly after his release in 2014, Ford took a medical exam that revealed the presence of Stage Three lung cancer. At the time of the filing of this complaint, Ford's cancer has progressed to Stage Four and is terminal.

50. Had the cancer been treated by Defendants while Ford was at Angola, it may have been able to be forced back into remission or otherwise managed.

Ford's Misdiagnosed and Untreated Stomach Infection

51. Towards the end of his incarceration at Angola, Ford began to experience persistent flu-like symptoms and unexplained weight fluctuations.

52. Ford was told by Defendants it was merely a thyroid problem, but Defendants did not provide treatment for a thyroid condition.

53. Once out of prison, Ford was diagnosed with a serious, untreated stomach infection.

Ford's Ignored and Untreated Knee Injury

54. In 1998 a tendon popped in Ford's left knee and his joint swelled up substantially.

55. The Defendants' medical aid was simply to give Ford an ace bandage and Tylenol, and drain the fluid.

56. Defendants told Ford that he would need to get "therapy" for the injury, but never provided him with the therapy or even told him what it was.

57. No Defendant took any steps to fix the underlying problem of the popped tendon.

58. After being released from prison, Ford has discovered that due to the long neglect of Defendants, it will take substantial surgery to improve the condition of his knee.

Ford's Misdiagnosed Gallbladder Infection

59. In approximately 2001, Ford complained to Defendants about severe stomach pain.

60. Ford tried to see prison doctors about his stomach pain approximately fifteen to sixteen times over several months. The pain rose until the point that it was “a steady, ongoing feeling where [Ford] couldn't eat, couldn't do anything but hurt.”

61. Defendants told Ford that he had a “nervous stomach” and gave him aspirin and Pepto Bismol, despite Ford's extreme pain, including pain all across his back.

62. Defendants ran no tests on Ford for his stomach pain. Defendants' practice or policy at Angola was that if a prisoner was not bleeding and had no broken bones, they would not run tests.

63. During that time, Ford turned ash brown and lost substantial weight.

64. Finally realizing the seriousness of Ford's condition, Defendants rushed Ford to surgery and had to remove his whole gallbladder

65. In each of these instances, Defendants exhibited deliberate indifference to the serious medical needs of Ford. Each condition presented an excessive risk to Ford's health.

66. In each of these instances, prison officials and doctors failed to investigate enough to make an informed judgment and in some cases, failed to provide adequate treatment for diagnosed conditions. In all the cases, the knowing delay in treatment caused serious consequences, and damages as described above and below. Each instance violated Ford's rights under the Eighth Amendment to the United States Constitution.

67. Each of the medical conditions described above exposed Ford to a substantial risk of serious harm, and Defendants displayed deliberate indifference to that risk.

68. Each of the medical conditions described above was so serious that the failure to treat it constituted unnecessary and wanton infliction of pain

69. For each of the medical conditions described above, Defendants were aware of facts from which the inference could be drawn that a substantial risk of serious harm existed; and for each Defendant's actually drew that inference.

70. As a direct and proximate result of the Defendants' actions and deliberate indifference, Ford suffered the grievous injuries and damages set forth above and below.

Count 2
(Claim for State-Created Hazard Under 42 U.S.C. § 1983
Against All Defendants)

71. Plaintiff realleges all of the above as though fully set forth herein.

72. During his stay at Angola, Defendants exposed Ford to fiberglass and asbestos-containing dust from insulation in his cell and other parts of the prison.

73. Defendants exposed Ford to mold contamination so serious that in 1987 that a lawsuit forced the prison officials to move the death row population to a different part of Angola. Two years later, Ford and the other death row inmates were returned to the facility that was the subject of the lawsuit.

74. During the nearly thirty years Ford spent at Angola, every week Defendants would flood the death row cell block with human sewage. Prisoners including Ford would have to get it out of their cell using a broom.

75. During his stay at Angola, Defendants repeatedly exposed Ford to second-hand tobacco smoke. He was forced into this exposure by Defendants as a result of prison rules allowing tobacco smoking, close proximity of Ford's cell to other prisoners, and extremely poor ventilation. For much of his incarceration at Angola, Ford was in Cell 4 on death row, a cell that

sat in a “dead space” with almost no ventilation whatsoever. The level of second-hand tobacco smoke Ford was exposed to under these ventilation circumstances constituted an unreasonable risk of serious damage to his future health.

76. During his stay at Angola, Defendants forced Ford into exposure to smoke and ash from the prison’s trash incinerator.

77. During his stay at Angola, Defendants forced Ford to inhale pepper spray approximately twenty times. None of the approximately twenty times related to any security situation involving Ford.

78. All of the above are state-created hazards that caused or contributed to the beginning or exacerbation of the lung cancer and stomach infection that Ford discovered after his release from prison.

79. As a direct and proximate result of the Defendant’s actions, Ford suffered the grievous injuries and damages set forth above and below.

Count 3

**(Claim for Unconstitutional Conditions of Confinement Under 42 U.S.C. § 1983
Against Defendant Wardens Burl Cain, Ross Maggio, John Whitley, Peabody, Robert
Hilton Butler, Frank C. Blackburn, Vannoy, and Prison Official Does 1-10)**

80. Plaintiff realleges all of the above as though set forth herein.

81. The conditions of Ford’s confinement at Angola violated his Eighth Amendment right to be protected from cruel and unusual punishment.

82. Those conditions included the flooding of his cell with human sewage, his exposure to asbestos, fiberglass, mold, smoke, and ash, and lack of ventilation.

83. These conditions resulted in an extreme deprivation of the minimal measure of life's necessities.

84. These conditions were so grave that it violates contemporary standards of decency to expose anyone unwillingly to such a risk.

85. Defendants were aware of these conditions but acted with deliberate indifference by not curing the conditions despite repeated requests and complaints by Ford and other prisoners.

86. As a direct and proximate result of the Defendants' actions, Ford suffered the grievous injuries and damages set forth above and below.

Count 4
**(Claim for Violation of Right to Equal Protection Under 42 U.S.C. § 1983
Against All Defendants)**

87. Plaintiff realleges all of the above as though fully set forth herein.

88. During his incarceration at Angola, Ford was under the control of Defendants, powerful governmental actors – the prison, its wardens and other officials, and the doctors that treated prisoners there.

89. At Angola, death row inmates were singled out for the particular and deliberate withholding of necessary treatment for serious medical conditions.

90. This withholding of treatment was an irrational difference in treatment with no legitimate governmental purpose.

91. As result, Defendant's acts violated Ford's Fourteenth Amendment right to equal treatment under the law, and such acts were the proximate cause of his injuries as described above and below.

Count 5
**(Claim for Violations of Other Federal Law, Federal Regulations, State Regulations, and
Prison Rules Against All Defendants)**

92. Plaintiff realleges all of the above as though fully set forth herein.

93. Ford's treatment and lack of treatment at Angola violated federal law, federal correctional regulations, state correctional regulations, and prison rules.

94. As result, Defendant's acts violated Ford's constitutional rights, and such acts were the proximate cause of his injuries as described above and below.

Count 6

(Claim for Engaging in Violations of Due Process that Shock the Conscience in Violation of the Fourteenth Amendment Under 42 U.S.C. § 1983 Against All Defendants)

95. Plaintiff realleges all of the above as though fully set forth herein.

96. The withholding of adequate medical care for Ford's serious physical conditions establishes a basis for finding arbitrary and conscience-shocking conduct on the behalf of defendants that contravened fundamental canons of decency and fairness and violated Ford's substantive due process rights under the Fourteenth Amendment.

97. Defendants' actions were in violation of clearly established constitutional law.

98. As result, Defendants' acts violated Ford's Fourteenth Amendment constitutional rights, and such acts were the proximate cause of his injuries as described above and below.

Count 7

**(Claim for Failure to Intervene Under 42 U.S.C. § 1983
Against All Defendants)**

99. Plaintiff realleges all of the above as though fully set forth herein.

100. By their conduct and under color of law, during the constitutional violations described herein, Defendants stood by and failed to intervene to prevent other Defendants and others yet unknown from violating Mr. Ford's constitutional rights. Defendants failed to intervene even though they had the opportunity to intervene.

101. The misconduct described in this Count was objectively unreasonable and was undertaken intentionally, with malice and willful indifference to Plaintiffs' clearly established constitutional rights.

102. As a direct and proximate result of Defendants' actions, Mr. Ford suffered the grievous injuries and damages set forth above and below.

Count 8
(Claim For Civil Conspiracy Under 42 U.S.C. § 1985
Against All Defendants)

103. Plaintiff realleges all of the above as though fully set forth herein.

104. Defendants and others yet unknown agreed among themselves and other individuals to act in concert to not to provide Ford with necessary medical treatment, and other violations of rights as described above and below.

105. The actions of Defendants and the yet-unknown co-conspirators were motivated, in whole or in part, by a disliking or hateful discriminatory attitude toward certain classes of which Glenn Ford was a member of, including the class of death row inmates and the class of African-American persons.

106. Defendants and co-conspirators knew that Ford was a member of these classes.

107. As a direct and proximate result of Defendants' conspiracy and actions in furtherance of that conspiracy, Ford suffered the other grievous injuries and damages set forth above and below.

108. Defendants for the conspiracy to deny Plaintiff his constitutional rights.

Count 9
(Claim For Intentional Infliction of Emotional Distress Under Louisiana Law
Against All Defendants)

109. Plaintiff realleges all of the above as though fully set forth herein.

110. The above-described actions by Defendants constitute extreme and outrageous conduct that caused Ford severe emotional distress.

111. The acts described above exceed all possible bounds of decency, and should be regarded as atrocious and utterly intolerable in a civilized community.

112. Defendants either desired to inflict severe emotional distress on Ford or knew that severe emotional distress would be certain or substantially certain to result.

113. If what was done to Mr. Ford was done to defendants, there is little doubt that they would be filing this very same lawsuit.

Count 10
(Claim For Article 2315 Negligence Against All Defendants)

114. Plaintiff realleges all of the above as though fully set forth herein.

115. Defendants' actions described above caused Ford's harms as described above and below.

116. Due to their professional roles at Angola, Defendants owed duties to avoid these harms to Ford.

117. These duties were breached by Defendants' acts and omissions, including their failure to provide Ford with adequate medical care and a safe environment, and in their negligent hiring, training, and supervision of their subordinates.

118. The risks and harms that Defendants caused were within the scope of protection afforded by the duties they owed to Ford.

119. As a result of Defendants actions and omissions, Ford sustained actual damages.

120. It was foreseeable, that as a result of the individual Defendants' negligence, Mr. Ford would suffer the physical, emotional and pecuniary damages as described above and below.

Count 11

(Claim For Medical Malpractice Against Defendants Defendant Doctors Cassidy, Macmurdo, Collins, Demars, Sparks, and Doe Doctors 1-10)

121. Plaintiff realleges all of the above as though fully set forth herein.

122. Defendants breached the standard of care in their treatment and lack of treatment of Ford's medical conditions.

123. In particular, Defendants lacked the necessary degree of knowledge or skill (that degree of care ordinarily exercised by physicians or specialists licensed to practice in the state of Louisiana and actively practicing in a similar community and under similar circumstances) or failed to use reasonable care and diligence, along with his best judgment in the application of that skill

124. As a proximate result of this lack of knowledge or skill or the failure to exercise this degree of care, Ford suffered injuries that would not otherwise have been incurred.

125. These acts and omissions by Defendants proximately and directly caused Mr. Ford to suffer the physical, emotional and pecuniary damages as described above and below.

Count 12

**(Claim For Violations of the Louisiana Constitution
Against All Defendants)**

126. Plaintiff realleges all of the above as though fully set forth herein.

127. The Louisiana State Constitution, like the United States Constitution, guarantees a person's right to equal protection of the law, to due process of law, to be free from discrimination, to be free from cruel, excessive or unusual punishment and to additional unenumerated rights. See La. Cost. Art. I, §§ 2, 3, 5, 12, 20, 22, and 24 of the Louisiana State Constitution.

128. By reason of the same intentional, malicious, reckless and deliberate conduct that violated Mr. Ford's rights under the United States Constitution, Defendants' conduct violated the rights guaranteed plaintiffs under Article I, §§ 2, 3, 5, 12, 20, 22, and 24 of the Louisiana State Constitution.

129. These violations by Defendants of the Louisiana State Constitution proximately and directly caused Mr. Ford to suffer the physical, emotional and pecuniary damages as described above and below.

Count 13
(Direct Action Pursuant to Louisiana Revised Statute § 22:655
Against Defendant ABC Insurance Companies 1-10)

130. Plaintiff realleges all of the above as though fully set forth herein.

131. Defendant ABC Insurance Companies 1-10, upon information and belief, have issued and/or currently have in effect one or more policies of insurance covering one or more of the Defendants named herein. For valuable consideration received, these policies obligated Defendant ABC Insurance Companies 1-10, jointly and/or severally, to pay on behalf of their insured Defendant(s) any sums the insured Defendant(s) may become obligated to pay to Plaintiff or to indemnify their insured Defendant(s) for any sums the insured Defendant(s) may become obligated to pay Plaintiff.

132. By reason of their illegal and unconstitutional acts, Defendants are liable to Plaintiff for all damages and injuries Plaintiff has suffered as a result. Upon information and belief, Defendant ABC Insurance Companies 1-10 are contractually obligated to pay these sums on behalf of the insured Defendant(s).

133. Upon information and belief, Defendant ABC Insurance Companies 1-10 are liable to Plaintiff for any and all damages incurred by reason of the insured Defendant(s)' acts,

up to their policy limits, notwithstanding the fact that the insured Defendant(s) may themselves be able to assert claims of privilege or immunity from liability.

134. Pursuant to Louisiana Revised Statute § 22:655(B), Plaintiff brings a direct action against Defendant ABC Insurance Companies 1-10 to recover any and all sums they are obligated to pay Plaintiff on behalf of their insureds or to indemnify their insureds.

VI. DAMAGES

135. The above-described acts were shocking, and were performed by Defendants deliberately, with reckless disregard for the truth, and with malice.

136. The actions of Defendants, jointly and severally, constituted torts including that of intentional infliction of emotional distress.

137. The actions of Defendants, jointly and severally, deprived Plaintiff of his constitutional and civil rights guaranteed under United States and Louisiana Constitutions.

138. Defendants' unlawful acts and omissions caused Glenn Ford the following injuries and damages, which were foreseeable to Defendants at the time of their acts and omissions:

- a. physical injuries;
- b. pain and suffering;
- c. severe mental anguish;
- d. emotional distress;
- e. severe psychological damage;
- f. loss of professional opportunity;
- g. loss of income;
- h. infliction of physical illness;

- i. inadequate medical care;
- j. humiliation, indignities and embarrassment;
- k. degradation;
- l. medical expenses; and
- m. reduced mobility as a result of his medical conditions.

139. For all of these, Glenn Ford is entitled monetary relief.

140. Plaintiff Glenn Ford has Stage Four lung cancer and may not have long to live.

His entire adult life has been taken away from him, for a crime did not commit. On top of that, while in the care of the state his serious medical conditions were ignored and left untreated.

Plaintiff has suffered damages and injuries for which he is entitled to compensatory damages in an amount to be determined at trial.

141. Defendants' acts were intentional, malicious, deliberate, reckless, wanton, and/or cruel, such as to justify an award of punitive damages to Plaintiff.

142. Plaintiff furthermore suffered other injuries as set forth in other paragraphs of this Complaint.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Glenn Ford requests the following relief:

A. An award of compensatory damages to Plaintiff Glen Ford and against Defendants, jointly and severally, in an amount to be determined at trial;

B. An award of punitive damages to Plaintiff Glen Ford and against Defendants, jointly and severally, in an amount to be determined at trial;

C. An award of costs and attorneys' fees pursuant to 42 U.S.C. § 1988 or any other applicable law;

- D. For pre-judgment and post-judgment interest; and
- E. Any other relief to which Plaintiff is entitled.

VIII. JURY TRIAL DEMAND

Plaintiff Glenn Ford hereby demands trial by jury of all issues properly triable to a jury.

Respectfully submitted,

March 9, 2015

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March 9, 2015

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(Pending *pro hac vice* admission to the
United States District Court for the Middle
District of Louisiana.)