

IN THE DISTRICT COURT WITHIN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

ALYSON KING,

Plaintiff,

vs.

STEVEN C. ANAGNOST, M.D., and
THE ORTHOPAEDIC CENTER,

Defendants.

DISTRICT COURT
FILED

OCT 30 2009

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLAHOMA - TULSA COUNTY

) Case No.:

CJ 2009 08358

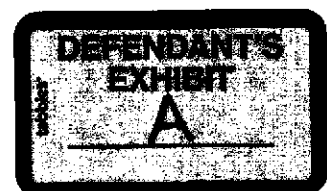
Rebecca Brett Nightingale

) JURY TRIAL DEMANDED
) ATTORNEY LIEN CLAIMED
)
)

PETITION

COMES NOW the Plaintiff, Alyson King, and for her Petition states:

1. Alyson King is and was a resident of Tulsa, Tulsa County, Oklahoma, at the time of the incident from which this action arises.
2. Defendant Steven C. Anagnost, M.D. ("Anagnost"), is a licensed practicing medical doctor who practices in Tulsa, Tulsa County, Oklahoma. Anagnost can be served at his place of business at 802 S. Jackson, Suite 130, Tulsa, Oklahoma 74127.
3. Defendant The Orthopaedic Center is an Oklahoma corporation which does business in Tulsa, Tulsa County, Oklahoma. The Orthopaedic Center can be served through its agent of service: R. Blake Atkins, 1406 Terrace Drive, Tulsa, Oklahoma 74104-4626. It employed Defendant Anagnost and was responsible for his negligence.
4. Plaintiff Alyson King had suffered with back problems and had undergone two (2) microdiscectomies with Dr. David Malone.



5. She then underwent a fusion at L5-S1 with Defendant Anagnost. He then performed a second surgery to remove all of the hardware.

6. Plaintiff was feeling better and was in physical therapy and doing well until she fell at work on February 5, 2007. Dr. Anagnost determined that the fall had caused her to throw out her L4-L5 disk.

7. At that time, Plaintiff opted to have another fusion and returned to Dr. Anagnost for the surgery. That surgery was performed on March 28, 2007.

8. Following that surgery Plaintiff became very ill and was vomiting. On May 11, 2007 Dr. Anagnost operated again and did another revision. When she woke up following that surgery, she had no feeling at all in her left foot or in parts of her left leg.

9. Subsequently Dr. Anagnost performed another surgery to remove all of the hardware from the second fusion.

10. Plaintiff continued to suffer pain in her back and left leg and foot. She was using a cane to ambulate because of her foot drop, the loss of feeling in her foot and leg problems.

11. Plaintiff began seeing Dr. Karl Detwiler due to continued pain. Dr. Detwiler thought she might have a bone spur. When Dr. Detwiler and Dr. Hawkins performed surgery on her on May 21, 2008, they discovered that she was not fused at L4-L5 or L5-S1. This surgery took approximately six hours and included extensive work with Plaintiff's nerves and fusions at L4-L5 and L5-S1.

12. Plaintiff was still having pain and Dr. Detwiler recommended that she have a Spinal Cord Stimulator surgically implanted. This procedure was performed on September 15, 2009. This has given her some relief from the back pain, but she still has significant

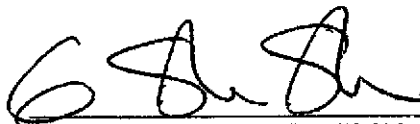
problems and pain with her foot and leg. She continues to use a cane due to her foot drop and the loss of feeling in her foot and leg. She has been permanently injured.

13. Defendants were negligent and acted in reckless disregard of Plaintiff's rights.

WHEREFORE, Plaintiff seeks actual damages in an amount in excess of \$10,000; punitive or exemplary damages in an amount in excess of \$10,000, costs, attorneys' fees and such other relief the Court deems just.

Respectfully submitted,

SNEED LANG HERROLD



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