

1 training facility, home stadium and during away games, from team doctors and trainers, including
2 trainer Billy Brooks, who failed to provide a prescription when one was necessary or adequate
3 directions for the medications' use, including adequate warnings of uses that have potentially
4 dangerous health consequences. The medications were provided to him for the sole purpose of
5 enabling him to practice and play through pain. Mr. Sadowski lives with constant pain in his back,
6 hips, wrists, knees, ankles and shoulders. He still needs to take daily painkillers to get through the
7 day and to sleep. He can no longer run and, when he walks, he feels as if his joints lack sufficient
8 lubrication. He cannot lift his daughter nor have her sit on his lap without excruciating pain. His
9 weight is increasing due to his inability to exercise. Mr. Sadowski directly attributes the foregoing
10 current injuries he suffers to the injuries he suffered in the NFL that were masked by the
11 Medications, or the Medications themselves, provided to him by the Clubs for whom he played.
12 While playing for the Atlanta Falcons from 1975 to 1985, putative class member Steve Bartkowski
13 received anti-inflammatory drugs, including Butazolidin, which he consumed, from team trainer
14 Jerry Rhea, who provided no warnings or mention of side effects and for the sole purpose of
15 enabling him to practice and play through pain. Mr. Bartkowski now suffers from chronic joint pain
16 that he directly attributes to the Medications, or the Medications themselves, he received while
17 playing in the NFL.
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20 248. **Baltimore Ravens**: As reported in ESPN Magazine on November 14, 2016, prior to
21 their January 3, 2015 playoff win against the Pittsburgh Steelers, Ravens' team doctor Andrew
22 Tucker cleared putative class member Eugene Monroe to play, even though he had been suffering
23 from a nagging high ankle sprain and could "barely ... walk, much less run, much less push off."
24 Mr. Monroe sought a second opinion from his own doctor, who advised him not to suit up (and he
25 didn't). In the next game, a loss to the New England Patriots, "Baltimore's coaches played [Monroe]
26 on special teams and not at left tackle. 'It felt like punishment,' [Monroe] says. Baltimore lost."
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1 The article also details how, while playing for the Ravens from 2013 to 2015, Mr. Monroe “stood in
2 line for injections of the anti-inflammatory Toradol, and the rest of the time he took the pills that
3 team doctors and surgeons prescribed for him. A 10-year prescription for the anti-inflammatory
4 Celebrex; another for the gastric distress the Celebrex caused; another for Ambien, when he was too
5 jacked up or in too much pain to sleep; another for the migraines caused by his concussions; and
6 then the prescriptions for the pain, Vicodin and Oxycontin, when he was either trying to forestall
7 surgery or trying to recover from it. His intake wasn’t out of the ordinary. It was typical, and so was
8 the fact that it got him high.” Ultimately, Mr. Monroe was cut by the Ravens because, he thinks, he
9 advocated for use of marijuana as opposed to opioids for dealing with pain in the NFL. Regardless,
10 Mr. Monroe penned an article titled “Leaving the Game I Love” in which he stated that he was “only
11 29 and [that he] still ha[s] the physical ability to play at a very high level, so [he knows his] decision
12 to retire may be puzzling to some. But I am thinking of my family first right now – and my health
13 and my future.” He went on in that article to state that “[m]ore steps need to be taken to curb the
14 overuse of opioids in NFL locker rooms.”

17 In another article that Mr. Monroc pnned on May 23, 2016, “Getting off the T Train,” he
18 described “a small office sectioned off from the training room in M&T Bank Stadium that we use”
19 for the “T Train” – Toradol injections, which according to Mr. Monroe “is nothing more than a
20 bunch of really large guys waiting to pull their pants down to get shot in the butt with Toradol, a
21 powerful painkiller that will help them make it through the game and its aftermath.” In that article,
22 in which he advocates for medical marijuana research on pain in the NFL, Mr. Monroe poses the
23 following question: “How can a league so casual about the use of addictive opioids take such a hard
24 line on a drug that might provide a safer alternative?” He also tells the story of a former University
25 of Virginia teammate who “had gotten addicted to pain pills [in the NFL] and essentially vanished
26 [and] left his home for the streets and is now addicted to heroin.”

1 While playing for the Baltimore Ravens in 1999 and 2000, Charles Evans, represented in this
2 matter by his ex-wife, Etopia Evans, received pills from team trainers, including Bill Tessorf, and
3 Toradol injections from doctors, who upon information and belief were Claude Moorman and/or
4 Andrew Tucker, at the Ravens' training facility, home stadium and during away games. At her
5 deposition, Ms. Evans testified that, while he played for the Ravens, Mr. Evans would take Motrin
6 and Percocet, which were given to him in "a little yellowish envelope" that had no writing on it. She
7 further testified that, while she could not "put a number on it," Mr. Evans took "a lot of pills" while
8 with the Ravens and that he took more pills in Baltimore than he had in Minneapolis. Ms. Evans
9 testified that Mr. Evans did anything and everything he could to stay on the field and was worried
10 every "single day" he played in the NFL about being cut and "losing his spot to guys from major
11 universities because he knew that he came from a small black college that no one had ever heard of,
12 and if he came off the field the guy from Ohio State or everybody who backed him up came from a
13 big school [and if they came in], it [would] be hard for [Mr. Evans] to get back into the rotation"
14 and, as a result, Mr. Evans avoided surgery and instead took pain pills and Toradol injections, which
15 were readily provided to him.
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18 After retiring from the Baltimore Ravens in 2001, Mr. Evans served as a sideline reporter for
19 the team through the time of his death in 2008 at the age of 41 from heart failure. Ms. Evans
20 testified that, while serving as a sideline reporter, Mr. Evans would go to Ravens' team trainer Bill
21 Tessorf at the Ravens training facility in Owings Mills, Maryland to obtain pain pills and anti-
22 inflammatory drugs, including Percocet, Vicodin, Motrin and Advil. Ms. Evans further testified that
23 Mr. Evans would tell her that he was going to obtain those medications from Mr. Tessorf, did in
24 fact obtain those medications from Mr. Tessorf, and that he consumed them. She further testified
25 that she never saw him with a "prescription-like" bottle containing any of the medications he
26 received from Mr. Tessorf, which caused her to "know" that Mr. Evans did not receive a
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1 prescription for those medications (such as Percocet and Vicodin) that required one. She further
2 testified that Mr. Evans saw Ravens doctors after he finished playing for knee, ankle, and neck
3 injuries and that the ankle and neck injuries originally occurred in Minnesota.

4 After he retired, Mr. Evans was addicted to painkillers. He became a person Mrs. Evans no
5 longer recognized – constantly in pain and searching for relief. Eventually, Mrs. Evans and their
6 child moved back to her home in Baton Rouge because daily life with Mr. Evans had become too
7 difficult, thereafter seeing him on family vacations and frequent visits. Ms. Evans testified at her
8 deposition that, after his retirement, Mr. Evans was in pain in all the areas where he had suffered
9 major injuries while playing, such as his wrist, knees, ankles and triceps. A limp that had started
10 while he played for the Vikings became progressively worse. She further testified that he began to
11 progressively lose his hearing in his right ear while playing for the Vikings, that by the time he got to
12 the Ravens, he was completely deaf in his right ear, and that he told no one (other than her) about it
13 because of “job security.” She further testified that, in 2008, the year he died, he “was just aching all
14 over” and that he attributed that pain to the time he played in the NFL.

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17 In 2008, eight years after retiring from professional football, Mr. Evans died of heart failure
18 due to an enlarged heart. His family had no history of heart problems and his parents were alive as
19 of the filing of this action. Mr. Evans died alone in a jail cell – he had been incarcerated two days
20 before his death for failure to pay support for a child from college. He had spent his money on
21 painkillers instead. Ms. Evans directly attributes Mr. Evans’ addiction, pain, and death to the
22 injuries he suffered in the NFL that were masked by the Medications, or the Medications themselves,
23 provided to him by the Clubs for whom he played.

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25 While playing for the Baltimore Ravens from 1998 – 2001, putative class member Brad
26 Jackson received Toradol, Indocin, Percocet, Vicodin, Prednisone steroid packs, and other anti-
27 inflammatory drugs, which he consumed, as well as injections of cortisone and other anti-
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1 inflammatory drugs, from Dr. Andrew Tucker and trainers Bill Tessorf and Marc Smith, who
2 provided no warnings or mention of side effects and for the sole purpose of enabling him to practice
3 and play through pain. Mr. Jackson now suffers from chronic joint pain, which he believes is
4 directly attributable to the injuries he suffered in the NFL that were masked by the Medications, or
5 the Medications themselves, provided to him by the Clubs for whom he played.
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7 249. **Buffalo Bills**: While playing for the Buffalo Bills during the 2006 pre-season, named
8 Plaintiff Eric King injured his back and was given narcotics by team doctors and forced back into the
9 game before his back healed. During the next game, he hurt his back again. He was given
10 controlled substances after that injury. The pills he received from the doctors were pills in small
11 vials and envelopes, sometimes with no writing on them. In addition, during the 2005 season, Mr.
12 King received and consumed pain-numbing and anti-inflammatory medications, including but not
13 limited to Percocet, Toradol, and muscle relaxants, at the Bills' training facility, home stadium and
14 during away games, all of which he received from Bills team doctors or trainers, including but not
15 limited to trainer Shone Gipson, who failed to provide a prescription when one was necessary;
16 identify the medication by its established name; provide adequate directions for the medications'
17 use, including adequate warnings of uses that have potentially dangerous health consequences; or
18 provide the recommended or usual dosage for the medications.
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20 Bud Carpenter, the Bills' long-time trainer, corroborated certain of the foregoing allegations
21 at his deposition when he admitted under oath that he witnessed team doctors give players injections
22 of prescription medications without telling them what the drug was they were receiving or its side
23 effects, or for that matter, provide any related warnings and was not aware of anyone providing any
24 warnings related to Toradol prior to 2010. He further testified that doctors provided prescription
25 medications at places other than where they were allowed to do so in violation of federal and state
26 laws. He could not identify a single instance in which a player received any warning about a
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