IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

MANUEL BELMONTE, individually	§	
and as next friend of LILIANA	§	
BELMONTE, and on behalf of the Estate	§	
of CRISTINA BELMONTE; CECELIA	§	
BELMONTE ; and SOPHIA	§	
BELMONTE	§	
	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. 3:19-cv-1867
	§	
MEDSTAR MOBILE HEALTHCARE,	§	
UT SOUTHWESTERN MEDICAL	§	
CENTER, UNIVERSITY OF	§	
ALABAMA AT BIRMINGHAM,	§	
UNITED STATES DEPARTMENT OF	§	
HEALTH AND HUMAN SERVICES	§	
CENTER FOR DISEASE CONTROL	§	
AND PREVENTION, and PLANNED	§	
PARENTHOOD SOUTHWEST FORT	§	
WORTH	§	
	§	
Defendants.	§	

PLAINTIFF'S ORIGINAL COMPLAINT <u>AND JURY DEMAND</u>

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Now comes Plaintiffs, Manuel Belmonte, individually, as next friend of Sophia Belmonte, and on behalf of the Estate of Cristina Belmonte; Cecelia Belmonte; and Sophia Belmonte ("Plaintiffs"), and files this, their Plaintiff's Original Complaint and Jury Demand complaining of and about Defendants MedStar Mobile Healthcare, UT Southwestern Medical Center, University of Alabama at Birmingham, United States Department of Health and Human Services Center for Disease Control and Prevention, and Planned Parenthood Southwest Fort Worth ("Defendants"), and for causes of action would respectfully show unto the Court the following:

I. PARTIES

- Plaintiff Manuel Belmonte is the widow of Decedent and an individual resident of Tarrant County, Texas.
- 2. Plaintiff Liliana Belmonte is a daughter of Decedent and an individual resident of Tarrant County, Texas, and is a minor child, date of birth May 20, 2003. Plaintiff Manuel Belmonte, Liliana Belmonte's father brings this suit on her behalf, as next friend.
- Plaintiff Sophia Belmonte is a daughter of Decedent and an individual resident of Tarrant County, Texas.
- Plaintiff Cecelia Belmonte is a daughter of Decedent and an individual resident of Tarrant County, Texas.
- 5. Upon information and belief, Defendant MedStar Mobile Health ("MedStar") is an entity that regularly conducts business in the State of Texas, but has no registered agent for service of process. MedStar may be served with process by delivery of summons to the Texas Secretary of State, James E. Rudder Building, 1019 Brazos, Room 105, Austin, Texas 78701.
- 6. Upon information and belief, Defendant UT Southwestern Medical Center ("UT Southwestern") is a nonprofit organization that regularly conduct business in the state of Texas. UT Southwestern may be served with process by delivery of summons to its registered agent for service of process, the President of UT Southwestern, Dr. Donald K. Poldosky, 5323 Harry Hines Boulevard, Dallas, Texas 75390.
- 7. Upon information and belief, Defendant University of Alabama at Birmingham ("University of Alabama") is a nonprofit organization with no registered agent in Texas for service of process. University of Alabama may be served with process by delivery of summons to the

Texas Secretary of State, James E. Rudder Building, 1019 Brazos, Room 105, Austin, Texas 78701.

- 8. Upon information and belief, Defendant United States Department of Health and Human Services Center for Disease Control and Prevention ("CDC") may be served with process by delivery of summons to the Texas Secretary of State, James E. Rudder Building, 1019 Brazos, Room 105, Austin, Texas 78701.
- 9. Upon information and belief, Defendant Planned Parenthood Southwest Fort Worth ("Planned Parenthood") is a nonprofit organization that regularly conduct business in the State of Texas. Planned Parenthood may be served with process by delivery of summons to its registered agent for service of process, Kenneth Lambrecht, 7424 Greenville Avenue, Suite 206, Dallas, Texas 75231.

II. JURISDICTION AND VENUE

- 10. Venue is proper in the Northern District of Texas because Defendant UTSW is principally located in Dallas County, Texas and because all or a substantial amount of the events giving rise to Plaintiffs' claims occurred in Tarrant County, Texas.
- 11. This Court has jurisdiction under 28 U.S.C.A. § 1442 because at least one Defendant, CDC, is a federal entity. Additionally, this Court has federal question jurisdiction under 18 U.S.C.A. § 1983 and 21 C.F.R. § 50.20.

III. FACTS

12. On August 8, 2017, Decedent, Cristina Belmonte, was at her place of employment at a location of Defendant Planned Parenthood, where she experienced intermittent chest pain. When paramedics and employees of MedStar first arrived at Planned Parenthood, Decedent stated that

her chest pain was not severe. However, her condition quickly deteriorated, and she went into cardiac arrest immediately after being loaded onto a stretcher.

- 13. Plaintiff Manuel Belmonte arrived on the scene at Planned Parenthood and attempted to enter the room where his wife, the Decedent, was being treated by Defendant MedStar first responders. Even though the employees of Defendant Planned Parenthood knew Plaintiff Manuel Belmonte was the spouse of Decedent, the employees prohibited him from entering the room where Decedent was being treated. In addition, the MedStar first responders did not consult with Plaintiff Manuel Belmonte about the treatment Decedent was to receive, despite the fact that Plaintiff Manuel Belmonte was on-site and easily accessible for consultation.
- 14. After treating Decedent for an unreasonably extended period of time at Planned Parenthood, Defendant MedStar's first responders transported Decedent to Harris Methodist Hospital Southwest in Fort Worth, Texas where she subsequently passed away within an hour of arrival.
- 15. Several weeks following the passing of Decedent, Plaintiff Manuel Belmonte received a letter from UT Southwestern informing him that Decedent was involuntarily placed into a federal study that consisted of conducting alternative cardiac arrest treatments on qualifying patients. However, Decedent never gave consent to be placed into this study as she was unconscious shortly after Defendant MedStar first responders arrived, nor did the first responders receive consent from her husband, Plaintiff Manuel Belmonte, because he was never consulted.
- 16. Plaintiff Manuel Belmonte then requested all documentation to which he was rightfully entitled regarding how Decedent was selected to be involuntarily placed into the federal study and what the study entailed. UT Southwestern responded by stating the information Plaintiff Manuel

Belmonte sought need not be disclosed to him according to an opinion received from the Texas Attorney General, and the requested records were not provided to him.

- 17. The University of Alabama and the CDC are the sponsors of the study in which Decedent was involuntarily enrolled and were apparently responsible, at least in part, for the protocols and policies of the study.
- Defendants, their agents, servants, and employees negligently caused and negligently permitted nonconsensual and inadequate treatment to be administered upon Decedent and negligently failed to warn Decedent or Plaintiff Manuel Belmonte of the risks associated with the treatment; prevented Plaintiff Manuel Belmonte from refusing the treatment being studied; and prevented Plaintiff Manuel Belmonte from taking the Decedent, his wife, to the nearby hospital emergency room, despite the fact that Defendants, their agents, servant, and employees knew, or in the exercise of ordinary care, should have known of the risks involved with the treatment and that there was a likelihood Decedent could be injured or pass away, which is exactly what happened to Decedent.
- 19. Defendants, their agents, servants, and employees failed to obtain or even seek consent from Decedent or Plaintiff Manuel Belmonte, Decedent's husband, and indeed, prevented Plaintiff Manuel Belmonte from being involved in the treatment decision and the decision not to take Decedent immediately to the nearby hospital emergency room.
- 20. As a direct result of the aforementioned occurrence, Decedent lost her life, despite the fact that standardized and/or prompt emergency treatment methods in an emergency room could have prevented her untimely death. Additionally, Plaintiffs have suffered loss of consortium with Decedent and have experienced severe mental anguish, sorrow, and grief, and will, in reasonable probability, continue to do so in the future by reason of the nature of Decedent's passing.

- 21. Furthermore, the treatment actions taken by MedStar and UT Southwestern

 Constitute medical battery as they did not seek or receive consent from Decedent, nor did they conduct a reasonably diligent inquiry to find Plaintiff Manuel Belmonte, who had decision-making capacity and was nearby and could have been consulted with because he was on-site with first responders.
- 22. Because Defendants failed to disclose that Decedent Cristina Belmonte was involuntarily placed in a study until weeks after her death and burial, Plaintiffs had no reason to suspect that the treatment provided to her was subject to question and were denied the opportunity to refuse such treatment, to take her immediately to the nearest emergency room, or to have an autopsy performed.

IV. CAUSES OF ACTION AGAINST DEFENDANTS

Negligence

- 23. Plaintiffs repeat and reallege paragraphs 1 through 22 as if fully set forth herein.
- 24. Defendants owed Decedent a duty to exercise ordinary care in the administration of her emergency medical care.
- 25. Defendants breached their duty to Decedent by failing to adhere to the standardized medical procedures that are administered in the event a patient enters cardiac arrest by failing to obtain or seek consent, and by delaying her transport to an appropriate medical facility.
- 26. Decedent lost her life as a direct and/or proximate result of Defendants' negligence in diverting from the standardized medical procedure that reasonably should have been administered.
- 27. Plaintiffs have sustained severe emotional distress, grief, sorrow, and loss of consortium as a direct and/or proximate result of Defendants' negligence.

Gross Negligence

- 28. Plaintiffs repeat and reallege paragraphs 1 through 27 as if fully set forth herein.
- 29. Defendants were grossly negligent because the actors knew, or should have known, that their actions of deviating from standardized medical treatment, failing to obtain consent, and delaying Decedent's transport to an appropriate medical facility involved an extreme degree of risk to Decedent's life, yet despite these risks, the Defendants proceeded to act with a conscious disregard for the safety and welfare of Decedent.
- 30. Decedent lost her life as a direct and/or proximate result of Defendants' gross negligence.
- 31. Plaintiffs sustained severe emotional distress, grief, sorrow, and loss of consortium as a direct and/or proximate result of Defendants' negligence.

Battery

- 32. Plaintiffs repeat and reallege paragraphs 1 through 31 as if fully set forth herein.
- 33. Defendants' actions of involuntarily placing Decedent into a medical study under color of state and/or federal law, and preforming medical care that deviated from standardized medical procedure constituted medical battery since they did not seek or receive consent from Decedent, or else from Plaintiff Manuel Belmonte, her husband, who was available for consultation.
- 34. Furthermore, because Decedent was physically unable to give consent due to her medical condition, Defendants were required to conduct a reasonably diligent inquiry to find an adult surrogate who could consent to medical treatment on behalf of Decedent, and Plaintiff Manuel Belmonte was in the building, nearby and available, but was never consulted.
- 35. Despite the fact that Plaintiff Manuel Belmonte was on-site before first responders transported Decedent to the hospital, Defendants did not allow Plaintiff Manuel Belmonte to give

consent to enter Decedent into the medical study, in violation of 21 C.F.R. § 50.20, or to take Decedent immediately to the nearby hospital emergency room himself.

False Imprisonment

- 36. Plaintiffs repeat and reallege paragraphs 1 through 35 as if fully set forth herein.
- 37. Defendant Planned Parenthood restricted Plaintiff Manuel Belmonte from being with his wife, Decedent, while she was being treated by Defendant MedStar, thereby preventing him from consulting on the offered treatment and ultimately preventing Plaintiff Manuel Belmonte from refusing participation in the study and from taking her immediately to the nearby hospital emergency room himself, or otherwise from demanding that Defendant Medstar do so.
- 38. This was an intentional tort committed by Defendants Planned Parenthood and MedStar.

Conspiracy

- 39. Plaintiffs repeat and reallege paragraphs 1 through 38 as if fully set forth herein.
- 40. Defendants conspired to deny Decedent and/or Plaintiff Manuel Belmonte, Decedent's legal representative, the right to refuse consent to participate in the study which killed Decedent.

Violation of Open Records Act

- 41. Plaintiffs repeat and reallege paragraphs 1 through 40 as if fully set forth herein.
- 42. Plaintiff Manuel Belmonte, husband of Decedent, has a special right of access to confidential information and information regarding the study Decedent was involuntarily entered into prior to her death.
- 43. An agency, like UTSW, may not deny access to information to the Decedent's representative, to whom the information relates, on the grounds that the information is considered confidential.

44. However, despite Plaintiff Manuel Belmonte's reasonable requests to UTSW for the information regarding the study that Decedent was involuntarily entered into, Defendant UTSW refuse to disclose this information in violation of the Open Records Act.

VI. WRONGFUL DEATH AND SURVIVAL STATUTE

- 45. In addition to the counts above, Defendants are liable to the estate of Cristina Belmonte, and to Manuel Belmonte, Plaintiff's husband and next of friend of Decedent under the Texas Wrongful Death Act, section 71.001 *et seq.* of the Texas Civil Practice and Remedies Code for their negligence and wrongful acts and omissions as fully set forth herein above. Plaintiff Manuel Belmonte is the surviving wrongful death statutory beneficiary entitled to bring this action pursuant to Tex. Civ. Prac. & Rem. Code Section 71.004. His name and relationship to Cristina Belmonte, Deceased, is as follows: Manuel Belmonte, surviving husband of Cristina Belmonte. Manuel Belmonte brings this wrongful death action in his individual capacity and as next of friend of Decedent for the personal injury damages that Cristina Belmonte suffered prior to her death under Texas Civil Practices and Remedies Code Section 71.021.
- 46. Cristina Belmonte's life was cut short as a result of the actions of the Defendants, who contributed directly to the deterioration of her health and life expectancy. During her lifetime, Cristina Belmonte was industrious and energetic and a good wife, mother, and caretaker of the family. She performed numerous and usual asks in and about the family residence, brought in income for the family, and gave advice, counsel, comfort, care, and protection to her family. At her death, Cristina Belmonte possessed assets which, in all reasonable probability, she could have continued to accumulate for the remainder of her natural life.

- 47. As a direct result of Defendants' negligence and wrongful acts and omissions, as more fully set forth herein above, Decedent suffered severe pain, emotional distress, and mental anguish.
- 48. Additionally, Plaintiff has incurred the following damages: pecuniary loss sustained in the past, and that in reasonable probability will be sustained in the future, for the loss of the care, maintenance, support, services, advice, counsel, and reasonable contributions of a [ecuniary value, excluding loss of inheritance, that Plaintiffs, in reasonable probability would have received from the Decedent had she lived;
 - a. Loss of companionship and society sustained in the past, and that in reasonable probability will be sustained in the future, for the loss of the positive benefits flowing from the love, comfort, companionship, and society that Plaintiffs, in reasonable probability, would have received from Decedent had she lived;
 - Mental anguish in the past, and that in reasonable probability will be sustained in the future, for the emotional pain, torment, and suffering experienced by Plaintiffs because of the death of the Decedent; and
 - c. Loss of inheritances, including the loss of the present value of the assets that
 Decedent, in reasonable probability, would have added to her estate and left to
 Plaintiffs upon Decedent's natural death.

VI. SECTION 1983 CLAIMS

49. The battery and false imprisonment committed on Decedent by Defendants under color of state and/or federal law deprived Decedent of her constitutional right to life and liberty, free of battery and unreasonable restraint, and was carried out pursuant to a policy and/or protocol of

involuntary treatment without consent, under color of state and/or federal law with deliberate indifference to the rights of Decedent.

VII. DAMAGES

- 50. Plaintiffs repeat and reallege paragraphs 1 through 49 as if fully set forth herein.
- As a result of Defendants' commission of medical battery, gross negligence, conspiracy, and false impression in addition to violating the Open Records Act, and other harmful conduct set forth hereinabove, Decedent lost her life. Plaintiffs have sustained extraordinary emotional pain, grief, sorrow, and mental anguish, as well as a loss of consortium. Plaintiffs have brought this suit against Defendants for the damages they and the deceased have suffered as a result of Defendants' conduct under the Texas Wrongful Death Statute. Plaintiff Manuel Belmonte also brings claims on behalf of the estate and heirs of Cristina Belmonte recoverable under the Texas Survival Statute.
- 52. The damages sought herein are within the jurisdictional limits of the Court and Plaintiffs seek monetary relief over \$1,000,000 plus a judgement for all other relief to which Plaintiffs are entitled. The amount of the monetary relief actually awarded, however, will ultimately be determined by the trier of fact.

VIII. REQUEST FOR LEGAL HOLD

Defendants are requested to hold and to take steps necessary to preserve all evidence relevant to this case during the pendency of this litigation, including but not limited to all documents, records, reports, X-ray films, films, photographs, emails, letters, text messages, video, audio, property, and any other form of communication or other evidence related to Decedent and/or Decedent's injuries.

IX. JURY DEMAND

54. Plaintiffs demand a jury trial and tender the appropriate fee with this Complaint.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that Defendants appear and answer herein, and that upon final hearing, they have judgement against Defendants for damages, together with pre- and post-judgment interest at the highest legal rates, costs of court, and all such other and further relief, general and special, legal equitable, to which they may show themselves justly entitled.

Respectfully submitted,

/s/ D. Bradley Kizzia

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ATTORNEYS FOR PLAINTIFFS

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

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