

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
JENNIFER MEESE,

Plaintiff,

-against-

PLANNED PARENTHOOD OF NEW YORK
CITY - BH, PARK MADISON LABORATORIES,
INC., HELENE GROSS, N.P. and
JOHN KORZIS, M.D.

Defendants.
-----X

SUMMONS

Index Number:
Date Purchased:

Plaintiff designates Kings
County as the place of trial.

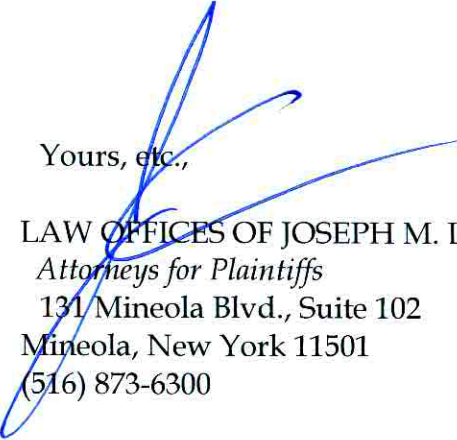
The basis of venue is
Plaintiff's residence located at
279 82nd Street Apt 2D,
Brooklyn, New York

TO THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's attorneys LAW OFFICES OF JOSEPH M. LICHTENSTEIN, P.C. within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if the summons is not personally delivered to you within the State of New York); and in the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Mineola, New York
September 26th, 2012

Yours, etc.,


LAW OFFICES OF JOSEPH M. LICHTENSTEIN, P.C.
Attorneys for Plaintiffs
131 Mineola Blvd., Suite 102
Mineola, New York 11501
(516) 873-6300

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
JENNIFER MEESE,

Plaintiff,

-against-

VERIFIED
COMPLAINT

Index Number:

Date Filed:

PLANNED PARENTHOOD OF NEW YORK
CITY - BH, PARK MADISON LABORATORIES, INC.,
HELENE GROSS, N.P., and JOHN KORZIS, M.D.

Defendants.
-----X

Plaintiff, by her attorneys, THE LAW OFFICES OF JOSEPH M. LICHTENSTEIN, P.C.
complaining of the defendants, alleges upon information and belief as follows:

AS AND FOR A FIRST CAUSE OF ACTION

1. That at all times stated herein, plaintiff JENNIFER MEESE was and is a resident of the County of Brooklyn, State of New York.
2. That at all times mentioned, the defendant, PLANNED PARENTHOOD OF NEW YORK CITY-BH, was and is a medical institution with facilities located at 44 Court Street, Brooklyn, NY 11201-4405.
3. That at all times hereinafter mentioned, the defendant, PLANNED PARENTHOOD OF NEW YORK CITY-BH, held itself out as a facility qualified, equipped and staffed to treat persons with ailments and, more particularly, with the type of ailment such as suffered by the plaintiff.
4. That at all times stated herein, the defendant, PARK MADISON LABORATORIES, INC. owned, operated and managed a laboratory facility in New York located at 133 East 73rd Street, New York, NY 10021-3556.

5. That at all times stated herein, the defendant, PARK MADISON LABORATORIES, INC., held itself out as capable and competent in pathological analysis.

6. That at all times stated herein, defendant, HELENE GROSS, N.P., was a nurse practitioner duly licensed in the State of New York and employed by PLANNED PARENTHOOD OF NYC-BH, as a Nurse Practitioner.

7. That at all times hereinafter mention, the defendant, HELENE GROSS, N.P., was a nurse practitioner holding himself/herself out to the general public as being competent in the care and treatment of patients and able to treat patients in general, and, more particularly with the type of ailment such as that suffered by the plaintiff, in accordance with the acceptable standards of medical practice.

8. That at all times hereinafter mentioned, the defendant, JOHN KORZIS, M.D., was and is a physician duly licensed to practice medicine in the State of New York, and employed by PARK MADISON LABORATORIES, INC., as a pathologist.

9. That at all times hereinafter mentioned, the defendant, JOHN KORZIS, M.D., was a physician/pathologist holding himself out to the general public as qualified to diagnose persons with ailments, and more particularly, with the type of ailment such as that suffered by the plaintiff.

10. That the defendants, their agents, servants and/or employees undertook and agreed to render medical care to the plaintiff JENNIFER MEESE, on or about January 7th, 2011 continuing through January 20th, 2012 and for other times prior and subsequent thereto

11. The defendant, its agents, servants, partners, residents and/or employees were negligent in the care rendered for and on behalf of the plaintiff in that the medical care and treatment was rendered in an improper, negligent, and careless manner, in that said defendants,

their agents, servants and/or employees failed, neglected and omitted to exercise, use and employ the skill, care and diligence commonly and ordinarily possessed by and required by physicians, hospitals, medical institutions, nurse practitioners, and laboratories; that said defendants were further careless and negligent in failing, neglecting, and omitting to take, use and employ reasonable and proper steps and procedures and practices for health, welfare and safety of the plaintiff; that said defendants were further negligent and committed medical malpractice in that said defendants departed from accepted standards of medical care, and in particular that the defendants failed to timely diagnose the plaintiff. The defendants, their agents, servants, and employees were otherwise careless, reckless and negligent under the circumstances then and there existing. The defendants, their agents, servants, partners, residents, and/or employees were negligent in the care rendered for and on behalf of the plaintiff. In addition to the foregoing, plaintiff reserves the right to rely on the doctrine *res ipsa loquitor*.

12. As a result of the foregoing, the plaintiff was rendered sick and disabled, suffered injuries, pain and mental anguish, was compelled to seek medical care, was forced to undergo additional medical procedures/treatment, incurred expenses and was permanently injured at disabled.

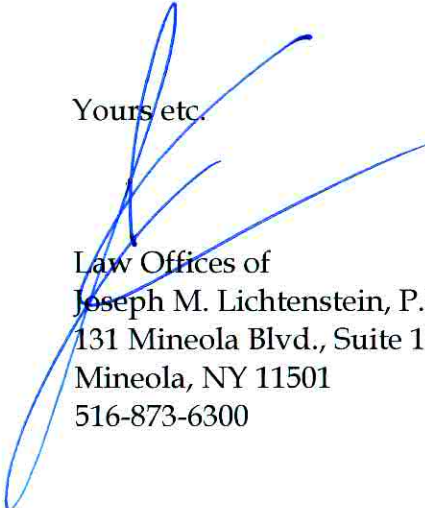
13. That the foregoing occurrence was caused solely and wholly as a result of the negligence of the defendants, their agents, servants and employees without any negligence on the part of the plaintiff contributing thereto.

14. That the plaintiff has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against the defendants, in an amount which exceeds the jurisdictional limits of all other lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Mineola, New York
September 26th, 2012

Yours etc.



Law Offices of
Joseph M. Lichtenstein, P.C.
131 Mineola Blvd., Suite 102
Mineola, NY 11501
516-873-6300

ATTORNEY'S CERTIFICATION

Pursuant to Section 130-1.1-a of the Rules of the Chief Administrator (22 NYCRR) the within **SUMMONS & COMPLAINT TO CPLR 3101(d)** is certified to the best of the undersigned knowledge, information and belief, formed after an inquiry reasonable under the circumstances. The presentations of the papers or the contentions therein are not frivolous as defined in subsection (c) of section 130-1.1.

Dated: Mineola, New York
September 26th, 2012




Joseph L. Ciaccio

ATTORNEY'S VERIFICATION

Joseph L. Ciaccio, an attorney duly admitted to practice law before the Courts of the State of New York, affirms the truth of the following under penalties of perjury; I am attorney of record for **JENNIFER MEESE** and know the contents thereof; the same is true to my own knowledge except as to those matters said to be upon information and belief and as to those matters I believe them to be true.

This affirmation is submitted by the undersigned because the plaintiff is not in the county where I maintain my office.

Dated: Mineola, New York
September 26th, 2012



JOSEPH L. CIACCIO

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X CERTIFICATE OF MERIT
JENNIFER MEESE,

Plaintiff,

-against-

PLANNED PARENTHOOD OF NYC-BH,
PARK MADISON LABORATORIES, INC.,
HELENE GROSS, NP, JOHN KORZIS, M.D.

Defendants.

-----X

JOSEPH L. CIACCIO, the attorney for the plaintiff in the above action, declares that a physician licensed to practice in the State of New York, who is knowledgeable of the relevant issues, was consulted.

On the basis of this consultation, the attorney has concluded that there is a reasonable basis for commencement of this action.

Dated: Mineola, New York
September 26th, 2012



JOSEPH L. CIACCIO