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Attorneys for Plaintiffs
ALEXANDRIA CROWDER

SUPERIOR COURT – STATE OF CALIFORNIA
COUNTY OF FRESNO (UNLIMITED JURISDICTION)

ALEXANDRIA CROWDER,

Plaintiff,

vs.

FAMILY FIRST HEALTH CENTER,
PLANNED PARENTHOOD MAR MONTE,
INC., JOHN ZWEIFLER, MD, and DOES
1 through 20, inclusive,

Defendants.

No.

COMPLAINT FOR DAMAGES

- Professional Negligence

JURY TRIAL REQUESTED

Plaintiff ALEXANDRIA CROWDER ("Plaintiff"), by and through her attorneys of record, alleges:

GENERAL ALLEGATIONS

- At all times herein mentioned, Defendant FAMILY FIRST HEALTH CENTER (hereinafter "FFHC") was a business entity unknown providing healthcare services at 6095 North First Street, Fresno, CA 93710.
- At all times herein mentioned Defendant PLANNED PARENTHOOD MAR MONTE, INC., (hereinafter "PPMMI") was a California corporation providing healthcare services in Fresno and throughout California.
- At all times herein mentioned Defendant JOHN ZWEIFLER, MD as a medical doctor providing healthcare services at FFHC.

Complaint for Damages
Crowder v. Family First Health Center, et al.

- 1 4. Plaintiff does not know the true names of defendants DOES 1 through 20,
2 inclusive, and therefore sues them by those fictitious names. Plaintiff will amend
3 this complaint to allege their true names and capacities when ascertained.
- 4 5. Plaintiff is informed and believes, and thereon alleges, that each of the
5 defendants herein was, at all times relevant to this action, the agent, employee,
6 representing partner, co-conspirator, or joint venturer of the remaining
7 defendants and was acting within the course and scope of that relationship.
8 Plaintiff is further informed and believes, and thereon alleges, that each of the
9 defendants herein gave consent to, ratified, and authorized the acts alleged
10 herein to each of the remaining defendants.
- 11 6. On or about January 29, 2016, Plaintiff underwent a skin biopsy of her right
12 ankle at Defendant FAMILY FIRST HEALTH CENTER, a subsidiary of Defendant
13 PLANNED PARENTHOOD MAR MONTE, INC.
- 14 7. Plaintiff is informed and believes, and thereon alleges, that PPMI had policies
15 and procedures to train, direct and monitor FFHC in properly providing medical
16 treatment and other healthcare services.
- 17 8. At FFHC, Defendant JOHN ZWEIFLER, MD performed the skin biopsy on Plaintiff
18 on that date.
- 19 9. Shortly thereafter, Defendants provided Plaintiff with follow up treatment and
20 antibiotics. Defendants told her any discomfort would resolve within a month or
21 two.
- 22 10. By May 16, 2016, Plaintiff had developed a severe infection in the area of the
23 biopsy and went to the emergency room at St. Agnes hospital.
- 24 11. At that time Plaintiff discovered she had developed a severe infection due to the
25 negligent skin biopsy.
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1 12. Plaintiff suffered from the effects of a severe ongoing infection of the skin biopsy
2 sight and extensive treatment due to the negligence of Defendants, and each of
3 them.

4 13. FFHC, PPMI, Dr. Zweifler and their employees, Defendants, and each of them
5 were negligent in their treatment of Plaintiff, including without limitation, by
6 performing the skin biopsy of her right ankle in a negligent manner and providing
7 negligent follow up care.

8 14. As a direct and proximate result of the professional negligence of Defendants,
9 and each of them, Plaintiff has suffered severe pain and suffering, severe
10 emotional distress, loss of physical and mental stamina and acuity, and
11 employability.
12

13 **FIRST CAUSE OF ACTION**
14 **[For Professional Negligence Against All Defendants]**

15 15. Plaintiff incorporates by reference each of the preceding allegations.

16 16. Defendants, and each of them, were negligent in the examination, diagnosis,
17 care, and treatment of Plaintiff from on or about January of 2016 through on or
18 about February of 2016.

19 17. Defendants, and each of them, provided medical treatment in the form of a skin
20 biopsy on her right ankle and follow up care.

21 18. In connection with the performance of the medical services described above,
22 Defendants, and each of them, owed Plaintiff a duty to possess and exercise, in
23 both diagnosis and treatment, that reasonable skill and care ordinarily possessed
24 and exercised by other hospitals, physicians, nurses and treatment centers and
25 their staff in the same or similar locality.
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1 19. Defendants, and each of them, breached their duty of care, and negligently
2 failed to possess and exercise that reasonable care and skill ordinarily exercised
3 by other hospitals, physicians, nurses and treatment centers and their staff in the
4 same or similar locality, in that, among other things, Defendants, and each of
5 them, performed the skin biopsy of her right ankle and provided follow up care in
6 a negligent manner such that Plaintiff developed a severe infection.

7 20. Further, Defendants, and each of them, negligently failed to discover their
8 negligence and provide appropriate care to relieve the infection.
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10 21. As a direct and proximate result of the negligence of Defendants, and each of
11 them, Plaintiff was hurt and injured in her health, strength, and activity,
12 sustaining injury to her nervous system and person, severe pain and suffering,
13 severe emotional distress, loss of physical and mental stamina and acuity, and
14 employability, all of which injuries have caused, and continue to cause, her great
15 mental, physical, emotional distress, pain and suffering, loss of enjoyment of life,
16 loss of the ability to earn income. She has had to incur, and will incur in the
17 future, additional psychological treatment and medical expenses. As a result of
18 these injuries, Plaintiff has suffered general damages in an amount within the
19 jurisdiction of the Superior Court.

20 WHEREFORE, Plaintiff prays for relief as set forth below.
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22 **REQUEST FOR A JURY TRIAL**

23 22. Plaintiff requests a trial by jury.
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PRAYER

WHEREFORE, Plaintiff prays judgment against Defendants, and each of them,
as follows:

1. For compensatory damages for Plaintiff's losses in an amount to be proven at trial, but in any event in excess of \$25,000;
2. For medical and related expenses according to proof;
3. For loss of earnings and employability according to proof;
4. For interest at the legal rate on the foregoing sum pursuant to Civil Code §3336 of the Civil Code;
5. For costs of suit herein incurred;
6. For such other and further relief as the court may deem proper.

Dated: March 2, 2017

ZIEF, DIMENT & GLICKMAN

By: 

Jordan A. Sussman
Attorneys for Plaintiffs
ALEXANDRIA CROWDER