1	Christina F. Michael, Esq. (SBN: 276645)	Electronically FILED by
2	Los Angeles Legal Advocates, APC. 1025 W. 190th Street, Suite 400	Superior Court of California, County of Los Angeles 2/10/2025 8:12 AM
3	Gardena, CA 90248 T: (310) 340-8173	David W. Slayton, Executive Officer/Clerk of Court,
4	E. <u>cmichael@lalegaladvocates.com</u>	By J. Mercer, Deputy Clerk
5	Attorney for Plaintiff,	
6	Jose Mauricio Cedeno Castillo	
7		
8	SUPERIOR COURT FOR THE STATE OF CALIFORNIA	
9	FOR LOS ANGELES COUNTY	
10		
11	JOSE MAURICIO CEDENO CASTILLO, )	CASE NO: 25LBCV00322
12	) Plaintiff, )	
13	) vs. )	COMPLAINT FOR PERSONAL
14	) PLANNED PARENTHOOD LOS ANGELES,) AND DOES 1 to 100, inclusive, )	INJURIES FOR MEDICAL MALPRACTICE
15		
16	Defendants.	
17	)	
18		
19	)	
20	COMES NOW the Plaintiff, JOSE MAURICIO CEDENO CASTILLO, and for causes of	
21	action against the Defendants, and each of them, alleges:	
22	1. The true names and capacities, whether corporate, associate, individual or	
23	otherwise, of Defendants, DOES 1 through 100, Inclusive, are unknown to Plaintiff, who	
24	therefore sues said Defendants by such fictitious names. Each of the Defendants designated	
25	herein as a DOE is negligently or otherwise legally responsible in some manner for the events	
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and happenings herein referred to and caused injuries and damages proximately thereby to the Plaintiff, as herein alleged. Plaintiff will ask leave of Court to amend this Complaint to show their names and capacities when the same have been ascertained.

2. At all times herein mentioned, Defendants, and each of them, were the agents, servants and employees, each of the other and at all times pertinent hereto were acting within the course and scope of their authority as such agents, servants, and/or employees.

3. At all times herein mentioned, Defendants and DOES 1 through 100, and each of them, were and are corporations, duly organized and existing under and by virtue of the laws of the State of California, with their principal place of business in the County of Los Angeles, State of California.

4. Defendants are medical care providers and businesses, including physicians, medical groups, professional corporations and surgery centers which were responsible for providing appropriate medical diagnosis, care and treatment for plaintiff.

## FIRST CAUSE OF ACTION FOR MEDICAL MALPRACTICE AGAINST ALL DEFENDANTS

Paragraphs 1 through 4 of the complaint are incorporated as though fully set forth.
At all times herein mentioned, Defendant, PLANNED PARENTHOOD LOS
ANGELES provided physicians licensed by the State of California with offices located at 2690
Pacific Ave Suite 260, Long Beach, CA 90806-2632, where it engaged in the business of
dispensing medical care and treatment and supervising the medical care and treatment of
patients, particularly to Plaintiff, JOSE MAURICIO CEDENO CASTILLO starting in May of
2023.

6. From at least May 2023, Plaintiff JOSE MAURICIO CEDENO CASTILLO
sought specialized medical care, treatment and diagnosis from Defendant PLANNED
PARENTHOOD LOS ANGELES from physician, employees and agents, DOE Defendants and

1 each of them.

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7. From at least May 2023, Plaintiff JOSE MAURICIO CEDENO CASTILLO sought a consultation for vasectomy from PLANNED PARENTHOOD LOS ANGELES and its agents and employees.

8. On May 20, 2023, Plaintiff JOSE MAURICIO CEDENO CASTILLO underwent a vasectomy at the offices of Defendant PLANNED PARENTHOOD LOS ANGELES, through its agent and employees and under its supervision.

9. On March 25, 2024, Plaintiff JOSE MAURICIO CEDENO CASTILLO was diagnosed with epididymo-orchitis.

10. On July 22, 2024, Plaintiff JOSE MAURICIO CEDENO CASTILLO was required to undergo a Left Epidimectomy & Right Orchiectomy as a result of his diagnosis of epididymo-orchitis.

11. Defendant PLANNED PARENTHOOD LOS ANGELES, its agents and employees so negligently failed to exercise the proper degree of knowledge and skill in examining, diagnosing, treating and caring for, Plaintiff JOSE MAURICIO CEDENO CASTILLO that he sustained severe and excruciating bilateral testicular pain, persistent and terrible physical pain, emotional pain and suffering, trauma, sickness, dread, fright, and shock. Additionally, he has incurred economic damages including, but not limited to medical expenses, loss of income, loss of future income, out of pocket expenses and non-economic damages, including excruciating physical and emotional pain, suffering, agony, stress, torment, fear, sleeplessness and devastation.

12.On November 11, 2024, Plaintiff JOSE MAURICIO CEDENO CASTILLO gaveDefendants written Notice of Intent to Commence this action. A copy of this notice is attachedWHEREFORE, Plaintiff prays judgment as to each cause of action as follows:

1. For general damages;

1	2. For economic damages, according to proof, including medical expenses,	
2	future medical expenses, loss of income, loss of future income, loss of	
3	business, out of pocket expenses;	
4	3. For interest on all economic damages from January 12, 2024 to the date of the	
5	judgment;	
6	4. For costs of suit herein incurred; and	
7	5. For such other and further relief as the court may deem just and proper.	
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9	Dated: February 10, 2025 LOS ANGELES LEGAL ADVOCATES	
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11	(Vu)	
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13	Christina F. Michael, Esq, Attorneys for	
14	Plaintiff JOSE MAURICIO CEDENO CASTILLO	
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	4	
	COMPLAINT FOR PERSONAL INJURIES	

## EXHIBIT A

## LOS ANGELES LEGAL ADVOCATES

P.O. Box 866, Hawthorne, CA 90250 - T: (310) 340-8173

November 11, 2024

<u>Sent Via U.S. Mail</u> Planned Parenthood – Long Beach Health Center 2690 Pacific Ave Ste. 370 Long Beach, CA 90806

KEVIN OLIVER 400 W. 30TH STREET LOS ANGELES, CA 90007

## NOTICE OF INTENT TO COMMENCE ACTION AGAINST HEALTH CARE PROVIDER (Code of Civil Procedure §364)

YOU ARE HEREBY NOTIFIED pursuant to the provisions of California Code of Civil Procedure §364, that **Jose Mauricio Cedeno Castillo**. intends to, and within ninety (90) days or more after the date of service of this notice will, commence a legal action against you and such other health care providers whose negligent involvement in the diagnosis, care and treatment of **Jose Mauricio Cedeno Castillo**. has not yet been determined.

The legal basis for such action will be that you and the other defendants to be named in such action were negligent in the examination, diagnosis, care and treatment of Jose Mauricio Cedeno Castillo. on or about **May 20, 2023**.

As a result of the foregoing negligence, **Jose Mauricio Cedeno Castillo** has sustained injuries, damages and losses of the types presently known:

- Medical and related expenses, and physical injuries including but not limited to radiation damage to his back, scarring, and disfigurement.
- Pain and suffering, emotional distress, and impairment of enjoyment of life.

All of the foregoing is based on facts as presently known, and there may be other and additional injuries, damages, losses and expenses still to ascertain.

This letter shall constitute compliance with the provisions of Section 364 of the California *Code of Civil Procedure*.

Very truly yours,

Christina F. Micha Esq.