

MICHAEL K. JEANES
Clerk of the Superior Court
By Farah Azadeh, Deputy
Date 01/30/2017 Time 16:07:07

Description	Amount
CASE# CV2017-002664	
CIVIL NEW COMPLAINT	319.00
TOTAL AMOUNT	319.00

Receipt# 25711591

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7 *Attorneys for Plaintiff*

8 IN THE SUPERIOR COURT OF ARIZONA
9 IN AND FOR THE COUNTY OF MARICOPA COUNTY

10 ASHANTI WATERS, individually,

11 Plaintiff,

12 v.

13 PLANNED PARENTHOOD OF ARIZONA,
14 INC., an Arizona non-profit organization;
15 PLANNED PARENTHOOD FEDERATION
16 OF AMERICA, INC.; a non-profit
17 organization; JOHN and JANE DOES I-X;
18 ABC CORPORATIONS; and XYZ
19 PARTNERSHIPS,

20 Defendants.

Case No. **CV2017-002664**

COMPLAINT

21 Plaintiff Ashanti Waters ("Ms. Waters") alleges as follows:

22 **PARTIES, JURISDICTION, AND VENUE**

- 23 1. Plaintiff Ashanti Waters is an Arizona citizen living in Maricopa County,
24 Arizona.
- 25 2. On information and belief, Defendant Planned Parenthood Federation of
26 America, Inc. is a non-profit organization which owns and operates Defendant Planned
Parenthood of Arizona, Inc. (collectively "Defendants"), an Arizona non-profit
organization located at 5771 W. Eugie Ave., Glendale, AZ 85304.
3. Defendants John and Jane Doe I-X are unknown fictitious parties who will be
named should their identities and liability to Plaintiff become known.

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- e. Failing to properly use the relevant medical equipment;
- f. Failing to properly perform the procedure;
- g. Failing to properly care for Plaintiff after the procedure.

27. As a direct result of Defendants' negligence, Ms. Waters has suffered serious pain, suffering and mental anguish.

28. Ms. Waters has incurred special damages as a result of Defendants' negligence.

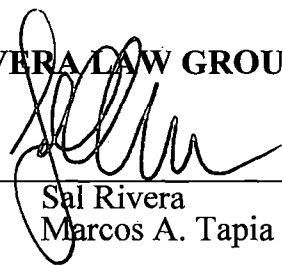
29. Ms. Waters has experienced loss of consortium because of Defendants' negligence.

30. The injuries, harm, and damages were incurred by Ms. Waters as a result of Defendants' use of medical equipment in a negligent and reckless manner.

DAMAGES

WHEREFORE, Plaintiff demands judgment against Defendants for the damages to be proven upon the trial, for all costs and expenses incurred herein, and for other and further relief as the Court deems just and appropriate.

DATED January 30, 2017.

RIVERA LAW GROUP, P.C.
By 

Sal Rivera
Marcos A. Tapia