

SHORT TITLE: Andersson vs. Moran	CASE NUMBER:
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4. Plaintiff (name): _____
 is doing business under the fictitious name (specify): _____
 and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. **except** defendant (name): FA Surgical Services
- (1) a business organization, form unknown
 (2) a corporation
 (3) an unincorporated entity (describe): _____
 (4) a public entity (describe): _____
 (5) other (specify): _____
- c. **except** defendant (name): _____
- (1) a business organization, form unknown
 (2) a corporation
 (3) an unincorporated entity (describe): _____
 (4) a public entity (describe): _____
 (5) other (specify): _____
- b. **except** defendant (name): _____
- (1) a business organization, form unknown
 (2) a corporation
 (3) an unincorporated entity (describe): _____
 (4) a public entity (describe): _____
 (5) other (specify): _____
- d. **except** defendant (name): _____
- (1) a business organization, form unknown
 (2) a corporation
 (3) an unincorporated entity (describe): _____
 (4) a public entity (describe): _____
 (5) other (specify): _____
- Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a. Doe defendants (specify Doe numbers): 1 to 10, inclusive were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. Doe defendants (specify Doe numbers): 1 to 10, inclusive are persons whose capacities are unknown to plaintiff.
7. Defendants who are joined under Code of Civil Procedure section 382 are (names): _____
8. This court is the proper court because
- a. at least one defendant now resides in its jurisdictional area.
 b. the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
 c. injury to person or damage to personal property occurred in its jurisdictional area.
 d. other (specify): _____
9. Plaintiff is required to comply with a claims statute, and
- a. has complied with applicable claims statutes, or
 b. is excused from complying because (specify): _____

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10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. Motor Vehicle
- b. General Negligence
- c. Intentional Tort
- d. Products Liability
- e. Premises Liability
- f. Other (*specify*):

medical malpractice/negligence

11. Plaintiff has suffered

- a. wage loss
- b. loss of use of property
- c. hospital and medical expenses
- d. general damage
- e. property damage
- f. loss of earning capacity
- g. other damage (*specify*):

12. The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. listed in Attachment 12.
- b. as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. **Plaintiff prays** for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) compensatory damages
- (2) punitive damages

The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):

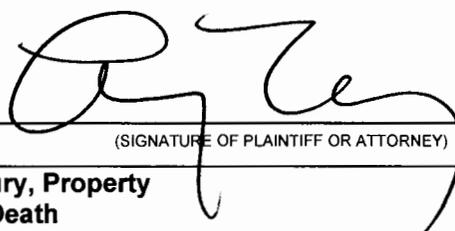
- (1) according to proof
- (2) in the amount of: \$

15. The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):

Date: June 17, 2013

Lawrence A. Moy

(TYPE OR PRINT NAME)

▶ 

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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FIRST _____ CAUSE OF ACTION—*Professional* Negligence Page 4
 (number)

ATTACHMENT TO Complaint Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): Elin Andersson

alleges that defendant (name): Thomas P. Moran, M.D.; FA Surgical Services Planned Parenthood,

Does 1 to 10, inclusive

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): March 21, 2012

at (place): defendant's office located at 2017 First Avenue, #100, San Diego, CA 92103

(description of reasons for liability):

Plaintiff was a patient of both defendant's on March 21, 2012 when she presented for an abortion. Defendants failed to properly treat Plaintiff for her abortion at defendant's facility and failed to provide proper follow up care. Plaintiff had an ectopic pregnancy which defendant failed to diagnose and treat. As a result, plaintiff's left fallopian tube ruptured 10 days after having been seen and treated by defendants at defendants facility. Plaintiff had to undergo an emergency surgery to remove her ruptured tube and had to have a blood transfusion due to the blood loss she suffered. Plaintiff alleges that defendant's actions fell below the standard of care and resulted in her injuries.