

1 STEVEN YORK, ESQ. SBN 239622
LAW OFFICES OF STEVEN YORK
2 1010 Second Ave., Ste. 1830
San Diego, CA 92101
3 Telephone: (619) 233-1033
Facsimile: (619) 684-3594

4 Attorney for Plaintiff HANAN PIROMARI
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN DIEGO – CENTRAL DIVISION
10

11 HANAN PIROMARI, an individual,

12 Plaintiff,

13 v.

14 THOMAS MORAN, MD; PLANNED
15 PARENTHOOD, and DOES 1 to 20,
inclusive,

16 Defendants.
17

Case No.: 37-2018-00006458-CU-MM-CTL

COMPLAINT FOR DAMAGES:

1. MEDICAL NEGLIGENCE

18 **PARTIES AND JURISDICTION**
19

- 20 1. Plaintiff HANAN PIROMARI (hereinafter “Plaintiff”) is an individual over the age of
21 eighteen and a resident of San Diego County, California.
22 2. Plaintiff is informed and believes and based thereon alleges that Defendant THOMAS
23 MORAN, M.D. and DOES 1 through 10, were or are professionals licensed by the State
24 of California to practice medicine in and were practicing medicine in said State and held
25 themselves out to possess the degree of skill, learning, ability and expertise possessed by
26 physicians, surgeons and medical professionals of like specialties in the County of San
27 Diego, State of California.

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3. Plaintiff is informed and believes that PLANNED PARENTHOOD and DOES 1 through 20 are, and at all relevant times herein mentioned were, professional entities duly organized and existing under and by virtue of the laws of the State of California and authorized to do business and doing business in the County of San Diego, State of California, and were providing medical services to the public including Plaintiff.
4. At all times mentioned, Defendants and each of them, were health care providers, including but not limited to, physicians, surgeons, physician's assistants, registered nurses, medical assistants, nurse's assistants, pharmacists, laboratory workers and other patient care providers, and were at all times agents, servants or employees of all other Defendants and were acting within the course and scope of said employment, agency and authority for each other, with the knowledge and consent of their co-Defendants.
5. The true and correct names and/or capacities of Defendants DOES 1 through 20, and each of them, are unknown to Plaintiff and they are being sued as fictitious names. Plaintiff is informed and believes and based thereon, alleges that each of the Defendants designed herein as a DOE is legally responsible in some manner for the events and happenings herein referred to and thereby directly and legally caused injury and damage to Plaintiff as herein alleged. Plaintiff will ask leave of the Court to amend this complaint to set forth their true names and/or capacities once names are ascertained. In the alternative, although the names of certain persons or entities are known to Plaintiff whether or not those persons or entities are culpable is not yet known to Plaintiff and, therefore, Plaintiff requests leave of Court to amend this complaint when discovery has been completed so as to include same as party-Defendants who may be properly joined herein.
6. The aforementioned fictitious Defendants, together with the named Defendants, are responsible for the hereinafter negligence, which is the legal cause or substantial factor in causing the injuries sustained by Plaintiff.

- 1 7. Plaintiff is informed and believes and based thereon, alleges that each of Defendants was
2 the agent and employee of the remaining Defendants, and in doing the things herein
3 alleged, was acting within the course of such agency and employment.
- 4 8. On or about December 21, 2017 Plaintiff sent Defendants THOMAS MORAN, M.D. and
5 PLANNED PARENTHOOD, a Notice of Intent to Commence Action Against Health
6 Care Provider pursuant to California Code of Civil Procedure Section 364.

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8 **CAUSE OF ACTION**

9 **MEDICAL NEGLIGENCE**

10 **(As Against All Defendants)**

- 11 9. PLAINTIFF hereby incorporates by reference paragraphs 1 through 8 hereinabove, as
12 those said paragraphs were set forth in full at this point.
- 13 10. On or around February 17, 2017, Plaintiff was under the care and treatment of
14 Defendants THOMAS MORAN, M.D.; PLANNED PARENTHOOD and DOES 1
15 through 20, inclusive, and each of them.
- 16 11. On or around February 17, 2017, Defendants THOMAS MORAN, M.D.; PLANNED
17 PARENTHOOD and DOES 1 through 20, inclusive, and each of them, negligently
18 treated Plaintiff in the course of terminating her pregnancy causing injury which led to
19 severe complications including hospitalization and ongoing care.
- 20 12. As a result of Defendants' professional negligence Plaintiff was admitted to the
21 Emergency Department at UCSD Hospital on or around February 17, 2017.
- 22 13. Defendant THOMAS MORAN, M.D.; PLANNED PARENTHOOD and DOES 1
23 through 20, inclusive, represented to Plaintiff that they would, at all times, exercise and
24 use skill, prudence, learning, knowledge, and expertise in the care and treatment of
25 Plaintiff, in accordance with the standard of care of competent, prudent and reputable
26 physician's assistants, physicians and surgeons, including but not limited to emergency

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care practitioners and health care practitioners in the same or similar locality and under the same or similar circumstances as herein alleged.

14. As a direct and legal result of the professional negligence of Defendant THOMAS MORAN, M.D.; PLANNED PARENTHOOD and DOES 1 through 20, inclusive, and each of them, Plaintiff was injured in her health, strength and activity, and sustained serious injury to her person. As a result of such injuries, Plaintiff has suffered general damages within the jurisdictional limitations of this Court all in amount to be shown according to proof at the time of trial.

15. By reason of the foregoing, Plaintiff has been required to employ the services of hospitals, physicians, surgeons, nurses and other professional medical services, and Plaintiff has been compelled to incur expenses for medicines, diagnostic images and other medical services. Plaintiff is informed and believes and thereon alleges that future services of said nature will be required by Plaintiff all to the damage of Plaintiff in a presently unascertained amount within the jurisdictional limits of this Court.

16. Before February 17, 2017, Plaintiff neither knew nor could have reasonably discovered the professional negligence of Defendant THOMAS MORAN, M.D.; PLANNED PARENTHOOD and DOES 1 through 20, inclusive, and each of them, or that the care they provided to Plaintiff was below the standard of care.

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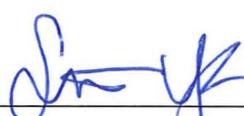
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PRAYER FOR RELIEF

WHEREFORE PLAINTIFF prays for judgment against Defendants, and each of them, on all causes of action as follows:

1. For general damages according to proof;
2. Sums incurred and to be incurred for services of hospitals, physicians, surgeons, nurses and other professional service, and other professional medical supplies and services;
3. For pre-judgment and post-judgment interest as allowed by law;
4. For costs of suit incurred herein; and
5. For such other and further relief as this Court may deem just and proper.

Dated: February 6, 2018

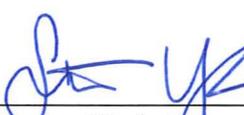
By: 

Steven York, Esq.
Attorney for Plaintiff,
HANAN PIROMARI

JURY DEMAND

PLAINTIFF hereby demands a trial by jury on all issues so triable.

Dated: February 6, 2018

By: 

Steven York, Esq.
Attorney for Plaintiff,
HANAN PIROMARI