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CIVIL BUSINESS OFFICE 10  
CENTRAL DIVISION

2007 NOV 21 P 12: 36

CLERK - SUPERIOR COURT  
SAN DIEGO COUNTY, CA.

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8 SUPERIOR COURT OF CALIFORNIA  
9 COUNTY OF SAN DIEGO - UNLIMITED JURISDICTION

10 RANIA FAKHOURY, an individual;

11 Plaintiff,

12 vs.

13 PLANNED PARENTHOOD OF SAN DIEGO  
14 AND RIVERSIDE COUNTIES, a corporation;  
15 and DOES 1-20, inclusive,

16 Defendants.  
17

) Case No. 37-2007-00073262-CU-MM-CTL

) FIRST AMENDED COMPLAINT FOR  
PERSONAL INJURY

) (MEDICAL MALPRACTICE)

18  
19 COMPLAINT

20 GENERAL ALLEGATIONS

21 1. The true names and capacities of the defendants, DOES 1 through 20, whether individual,  
22 corporate, associate or otherwise, are unknown to Plaintiff at the time of filing this Complaint and  
23 Plaintiff, therefore, sues said defendants by such fictitious names and will ask leave of court to amend  
24 this Complaint to show their true names or capacities when the same have been ascertained. Plaintiff is  
25 informed and believes, and therefore alleges, that each of the DOE defendants is, in some manner,  
26 responsible for the events and happenings herein set forth and proximately caused injury and damages to  
27 the Plaintiff as herein alleged.

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1           9.     As a direct and proximate result of the negligence, carelessness, recklessness, wantonness  
2 and unlawfulness of defendants, and each of them, and the resulting incident, as aforesaid, Plaintiff,  
3 sustained severe and serious injury to her person, all to Plaintiff's damage in a sum within the  
4 jurisdiction of this Court and to be shown according to proof.

5           10.    By reason of the foregoing, Plaintiff has been required to employ the services of  
6 hospitals, physicians, surgeons, nurses and other professional services, and Plaintiff has been compelled  
7 to incur expenses for medicines, x-rays, and other medical supplies and services. Plaintiff is informed  
8 and believes, and thereon alleges, that further services of said nature will be required by Plaintiff in an  
9 amount to be shown according to proof.

10  
11           **WHEREFORE**, Plaintiff, Rania Fakhoury, prays for judgment against the defendants, and each  
12 of them as follows:

- 13           a.     General damages in the sum according to proof;  
14           b.     Economic damages, including but not limited to sums incurred and to be incurred  
15 for services of hospitals, physicians, surgeons, nurses and other medical supplies and services;  
16           c.     Lost earnings, both past and future, in an amount to be determined at trial;  
17           d.     For interest provided by law including, but not limited to, *California Civil Code*  
18           e.     Costs of suit and for such other and further relief as the court deems proper.

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20  
21 Dated: November 19, 2007



22           DARRELL PALMER  
23           Attorney for Plaintiffs