

IN THE CIRCUIT COURT OF ST. LOUIS CITY
STATE OF MISSOURI

BRITTANY N. JONES,)
)
 Plaintiff,)
)
 v.)
)
 PLANNED PARENTHOOD OF THE)
 ST. LOUIS REGION AND)
 SOUTHWEST MISSOURI)
)
 Serve at:)
)
 4251 Forest Park Ave.)
 St. Louis, MO 63108)
)
 and)
)
 DR. ROBERT CRIST, M.D.)
)
 Serve at POE:)
)
 4251 Forest Park Ave.)
 St. Louis, MO 63108)
)
 Defendants.)

Case No.:

Division No.:

DAMAGES EXCEED \$25,000

JURY TRIAL DEMANDED

PETITION

COMES NOW Plaintiff, Brittany N. Jones, and for her Petition against Defendant Robert Crist, M.D., state as follows:

PARTIES AND JURISDICTION

1. Plaintiff Brittany N. Jones ("Brittany") is a resident and citizen of St. Clair County, Illinois.
2. Defendant Planned Parenthood of the St. Louis Region an Southwest Missouri is a corporation providing medical services in the City of St. Louis.

3. Defendant Robert Crist, M.D. ("Dr. Crist") is a physician licensed to practice medicine in the State of Missouri, board certified in urology, and practicing medicine in St. Louis County, Missouri.

4. At all times relevant to the allegations in this Petition, Dr. Crist held himself out to the public, in general, and to Brittany, in particular, as being a specialist in obstetrics and gynecology, and possessing the same or higher level of skill and training as other members of his profession, and that Dr. Crist was able to render care, treatment, and advice to Brittany for the conditions for which Brittany sought care, treatment, and advice from Dr. Crist for.

5. Venue is proper in this Court pursuant to RSMo. § 508.010 in that Brittany was first injured as a result of the following negligent acts or omissions of Defendants in St. Louis City, Missouri.

6. On January 5, 2015, Brittany visited Planned Parenthood for purposes of scheduling an abortion.

7. After initial tests were performed, an abortion was scheduled for January 9, 2015.

8. Dr. Crist was an employee of Planned Parenthood, and the physician who purportedly performed the abortion.

9. After the procedure was completed, the tissue extracted from Brittany's body was sent to a pathology lab for testing.

10. The pathology lab report indicated that there was no fetal tissue present.

11. Dr. Crist never informed Brittany that the abortion was not fully performed and that no fetal tissue was removed from Brittany's body.

12. As a result of Dr. Crist's failure to adequately perform an abortion of Brittany's fetus, on February 28, 2015, a fetus came out of Brittany's body while she was at her apartment, alone, along with a significant amount of blood.

13. As a result of Dr. Crist's negligence, Brittany unnecessarily suffered the following damage:

- a. Past pain, suffering, and inconvenience;
- b. Future pain, suffering, and inconvenience;
- c. Past medical bills;
- d. Future medical bills;
- e. Lost wages; and
- f. Other damages as will be borne out in discovery.

WHEREFORE, Plaintiff Brittany N. Jones respectfully requests that she be awarded compensatory damages against Defendants Planned Parenthood of the St. Louis Region and Southwest Missouri and Dr. Robert Crist, M.D. in an amount that is fair, reasonable, and just for all of the foregoing damages, but in an amount in excess of Twenty-Five Thousand Dollars, for her costs expended herein, and for all such other relief as the Court deems just and fair under the circumstances.

RESPECTFULLY SUBMITTED,

THE GOGEL LAW FIRM,

/s/ Jeremy A. Gogel

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