

STATE OF MISSOURI )  
 )  
CITY OF ST. LOUIS )

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

MAUREEN PEAL )  
 )  
Plaintiff, )  
v. )  
 )  
PLANNED PARENTHOOD, )  
DR. JUSTIN DEIDRICH, and )  
REPRODUCTIVE HEALTH )  
SERVICES OF PLANNED )  
PARENTHOOD OF THE ST. )  
LOUIS REGION, )  
Serve at 4251 FOREST PARK )  
1<sup>ST</sup> FLOOR, ST. LOUIS, MO )  
63108, )  
 )  
Defendants. )

Cause No.: 1922-CC00612  
Div No.: 1  
MEDICAL MALPRACTICE  
JURY TRIAL REQUESTED

**FIRST AMENDED PETITION**

Comes now the Plaintiff and for her First Amended Petition against the Defendants states and alleges as follows:

1. That at all times hereinafter mentioned, Plaintiff was a citizen and resident of the state of Missouri.
2. That at all times hereinafter mentioned, Defendant Reproductive Health Services of Planned Parenthood of the St. Louis Region was a corporation duly organized and existing by virtue of the laws of the State of Missouri, acting by and through its duly authorized agents, servants, employees and representatives including Defendant Dr. Justin Deidrich (hereinafter referred to as "Defendant Deidrich").

3. That at all times hereinafter mentioned, Defendant Reproductive Health Services of Planned Parenthood of the St. Louis Region (hereinafter referred to as "Defendant Planned Parenthood") operated a facility at 4251 Forest Park Avenue, St. Louis, Missouri where abortions were performed.

4. That on or about May 26, 2018 Plaintiff was determined to be approximately 10 weeks, 2 days of gestation and underwent a therapeutic abortion by suction curettage under local anesthesia by Defendant Deidrich.

5. That the operative summary report by the nurse stated that villi were seen, some fetal parts seen and that the products of conception were sent to pathology.

6. That in records received from Defendant Planned Parenthood, no pathology report was present to confirm that the therapeutic abortion was successfully completed.

7. That on June 29, 2018 Plaintiff was again seen at the aforesaid Defendant Planned Parenthood's facility by Defendant Deidrich and on ultrasound it was found that Plaintiff was still pregnant with a 15 week one day fetus. Plaintiff subsequently had another therapeutic abortion procedure which was a D&E on June 30, 2018 by Defendant Deidrich under ultrasound guidance.

8. Plaintiff's post operative course was complicated by readmission to Barnes Hospital on July 2, 2018 where she was diagnosed with sepsis secondary to endometritis/an infected uterus and she was treated with antibiotics and subsequently a third D&C.

9. That Plaintiff's damages, expenses and injuries from the supplemental abortions were directly and proximately caused and contributed to be caused by the

carelessness, negligence and deviation from appropriate standards of care by

Defendant Deidrich in the following respects, to-wit:

- a. If no specimens were, in fact, sent to pathology from the May 26, 2018 therapeutic abortion, then this would be a deviation from standard of care;
- b. Alternatively, if products of conception were, in fact, sent to pathology from the aforesaid May 26, 2018 therapeutic abortion but no villi were determined to be present, that would be a deviation from standard of care.

WHEREFORE, Plaintiff prays judgement against Defendants in such sum as will fairly and justly compensate Plaintiff for any and all damages Plaintiff has sustained and is reasonably certain to sustain in the future, in an amount in excess of \$50,000.00, together with her costs herein expended.



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A copy of the foregoing was forwarded this 13th day of June, 2019 to: Mark Feldhaus, Attorney for Defendant Planned Parenthood, 714 Locust Street, St. Louis, MO 63101; [mfeldhaus@lashlybaer.com](mailto:mfeldhaus@lashlybaer.com).

