

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

2012 OCT 31 P 2:44

NANCY LITTLE
6934 State Route 45
Bristolville, Ohio 44402-9775

) Case No.
) GERALD E. FUERST
) CLERK OF COURTS
) CUYAHOGA COUNTY
) Judge

Complaint
ANNETTE G BUTLER
CV 12 794674

And

JONATHAN LITTLE
6934 State Route 45
Bristolville, Ohio 44402-9775,
Plaintiffs

Vs.

) COMPLAINT FOR MEDICAL MALPRACTICE
) WITH MOTION FOR EXTENSION OF TIME TO
) FILE AFFIDAVIT OF MERIT

LASZLO SOGOR, M.D.
c/o Planned Parenthood
2668 Elm Road NE, Building C
Cortland, Ohio 44410-9393

) JURY DEMAND ENDORSED HEREON

And

PLANNED PARENTHOOD OF GREATER OHIO, INC.)
f/k/a/ Planned Parenthood of Northeast Ohio, Inc.)
2668 Elm Road NE, Building C)
Cortland, Ohio 44410-9393)
Defendants

\$290.00 DEPOSITED
OCT 31 2012
SECURE COSTS
GERALD E. FUERST, Clerk of Courts
PER *af* DEPUTY

NOW COME plaintiffs Nancy Little and Jonathan Little, Individually and as Husband and Wife, by and through counsel, and for their Complaint against defendants state as follows:

1. At all times relevant hereto, Defendant Planned Parenthood of Greater Ohio, Inc. (formerly known as Planned Parenthood of Northeast Ohio, Inc.) (hereinafter referred to as "Planned

Parenthood”) was a corporation licensed to do business by the State of Ohio, which did own and/or operate a public medical and surgical facility called Planned Parenthood in numerous cities throughout Ohio including those in Cuyahoga County and others. Defendant Planned Parenthood held out its facilities in Cuyahoga County and other locations as a medical and surgical center providing gynecologic and other medical services by physicians and other healthcare providers to plaintiff and others.

2. Members of the public are invited to rely upon and use the facilities at the Planned Parenthood clinics in Cuyahoga County and elsewhere as patients where they receive medical, surgical, nursing and other healthcare services from officers, agents, employees and other representatives of defendant Planned Parenthood including physicians, surgeons, nurses and other healthcare providers including but not limited to defendant Laszlo Sogor, M.D. and others.
3. At all times relevant hereto, defendant Laszlo Sogor, M.D. (hereinafter referred to as “Sogor”) was a physician licensed to practice medicine in the State of Ohio, who held himself out to the public, including to plaintiff herein, as a provider of safe and effective medical and surgical care in the specialty field of gynecology, at facilities operated by defendant Planned Parenthood at locations in Cuyahoga County and elsewhere.
4. At all times relevant hereto, defendant Sogor was an officer, employee and/or agent of defendant Planned Parenthood, and delivered to plaintiff Nancy Little medical and surgical services in the specialty field of gynecology in his capacity as an officer, employee and/or agent of defendant Planned Parenthood within the scope of his employment with, agency with and/or officer of Planned Parenthood at its clinical locations including facilities in Cuyahoga County.
5. Plaintiff Nancy Little was a patient of defendant Sogor and defendant Planned Parenthood at various locations for several years, including at defendant’s clinics in Cuyahoga County. In April, 2011, defendant Sogor performed a biopsy of plaintiff’s genitalia and prescribed a certain

medication for the treatment of her then present gynecologic conditions. That biopsy and the prescription of the Triamcinolone cream were as part of medical treatment provided by defendant Sogor at a clinic owned and operated by defendant Planned Parenthood in Cuyahoga County, Ohio.

6. Plaintiff Nancy Little developed serious medical problems relating to the performance of the biopsy and the prescription of the Triamcinolone cream for which she has sought medical and surgical care and treatment by various healthcare providers in Cuyahoga County and elsewhere.
7. The medical and surgical care and treatment provided to plaintiff Nancy Little by defendant Sogor and defendant Planned Parenthood beginning with the performance of the biopsy and the prescription of the Triamcinolone cream, was substandard and below the standard of care for gynecology, and the defendants individually and/or through their respective officers, employees and/or agents were individually and/or collectively negligent in their medical care and treatment of plaintiff Nancy Little.
8. Said negligence represents the failure of defendants to conform to the appropriate standards of care for gynecology in their respective treatment of plaintiff Nancy Little. Said negligence includes, but is not limited to, the performance of an unnecessary biopsy, the prescription of an improper medication for stated purpose, the failure to properly instruct plaintiff on the correct use of the medication, the failure to obtain sufficient informed consent for the biopsy and prescription of the medication provided to plaintiff, as well as other failures which constitute negligence.
9. Defendant Planned Parenthood is vicariously liable or otherwise responsible to plaintiff Nancy Little for the negligent acts and/or omissions of officers, employees and/or agents who provided medical and surgical care to her beginning in April 2011 and thereafter, including but not limited to defendant Sogor.

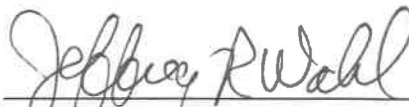
10. By reason of the negligent acts and/or omissions of defendants Sogor and Planned Parenthood, and as a direct and proximate result thereof, plaintiff Nancy Little was severely injured and harmed physically and in other respects, including but not limited to serious pain and suffering, loss of use of organs and other body systems, loss of employability, severe emotional distress, disability, continuing and ongoing medical and surgical care and treatment, past and continuing and ongoing medical and surgical expenses, medical and hospital expenses, loss of income, loss of the enjoyment of life, and others.
11. Plaintiff Nancy Little believes and avers that her injuries, damages and other symptoms are permanent in nature, and therefore, she will continue to experience pain and suffering and other losses/injuries, will incur future medical and hospital bills for care and treatment, will incur future loss of income, will have a permanent reduction in her earning capacity, will continue to suffer from the loss of enjoyment of life which she possess prior to these acts of negligence as described above, and others.

COUNT TWO

12. Plaintiffs incorporate herein by reference all of the allegations contained in paragraphs 1 through 11 of Count One of this Complaint.
13. At all times relevant hereto, plaintiff Jonathan Little was and is the lawful husband of plaintiff Nancy Little.
14. As a direct and proximate result of the negligent acts and omissions set forth in Count One, plaintiff Jonathan Little has sustained damages including loss of services, companionship, and consortium of his wife, and he will continue to lose such services, consortium and companionship on a permanent basis.

WHEREFORE, plaintiffs Nancy Little and Jonathan Little, individually and as husband and wife, demand judgment as compensatory damages against defendants jointly, severally and/or concurrently in an amount in excess of twenty-five thousand dollars (\$25,000.00) plus the costs of suit and whatever remedies the Court deems appropriate.

Respectfully submitted,

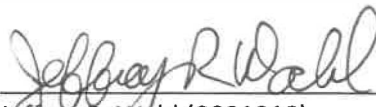


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Attorney for Plaintiffs Nancy Little and Jonathan Little

JURY DEMAND

Plaintiffs Nancy Little and Jonathan Little hereby demand a trial by jury consisting of the maximum number of jurors allowed by law as to all issues raised in this Complaint.



Jeffrey R. Wahl (0021919)
Attorney for Plaintiffs