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9 QIUMEI HUANG

10
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF LOS ANGELES

13 QIUMEI HUANG, an individual;

14 Plaintiff,

15 vs.

16 PLANNED PARENTHOOD; ANDREA
17 PRICE, PA; MEGAN FORCUM, RNP;
18 STACEY WONG, PA; and DOES 1-100,

19 Defendants.

) Case No. **26STCV12634**

) **COMPLAINT FOR:**

) **1. PROFESSIONAL NEGLIGENCE**

) **REQUEST FOR TRIAL BY JURY**

1 Plaintiff QIUMEI HUANG (“Ms. Huang”) hereby complains and alleges as follows:

2 **THE PARTIES**

3 1. At all times herein mentioned, Ms. Huang was an individual residing in the
4 county of Los Angeles, California.

5 2. Plaintiff is informed and believes and based thereon alleges, that Planned
6 Parenthood is a medical facility licensed to provide medical care in the State of California and
7 doing business in the County of Los Angeles, California.

8 3. Plaintiff is informed and believes and based thereon alleges that Andrea Price, PA
9 is a physician’s assistant licensed to practice medicine in the State of California and doing
10 business in the County of Los Angeles, California.

11 4. Plaintiff is informed and believes and based thereon alleges that Megan Forcum,
12 RNP is a nurse practitioner licensed to practice medicine in the State of California and doing
13 business in the County of Los Angeles, California.

14 5. Plaintiff is informed and believes and based thereon alleges that Stacey Wong, PA
15 is a physician’s assistant licensed to practice medicine in the State of California and doing
16 business in the County of Los Angeles, California.

17 6. The true names and capacities, whether individual, plural, corporate, partnership,
18 associate, or otherwise, of the defendants named herein as DOES 1 through 100, inclusive, are
19 unknown to Plaintiff who therefore sues such defendants by such fictitious names. Plaintiff is
20 informed and believes, and based upon such information and belief alleges, that each of the
21 defendants designated herein as DOES 1 through 100 is legally responsible in some manner for
22 the events and happenings herein referred to, and negligently, tortiously, and unlawfully,
23 proximately caused injury and damages to Plaintiff as alleged herein. Plaintiff will seek leave of
24 Court to amend this Complaint to show defendants’ true names and capacities after the same
25 have been ascertained.

26 7. Plaintiff is informed and believes and based thereon alleges, that each defendant
27 was the agent and employee of each other defendant, and in doing the things hereinafter alleged,
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1 acted within the scope and course of such agency and employment, and that each defendant has
2 ratified and approved the acts of each other defendant.

3 8. The events giving rise to the causes of action alleged herein occurred in the State
4 of California, County of Los Angeles, as that is where Plaintiff resides, where defendants do
5 business, and where the relevant incident occurred.

6 **GENERAL ALLEGATIONS**

7 9. By way of background, on or about July 14, 2025, Ms. Huang presented to
8 Planned Parenthood for an elective termination of her pregnancy. On that date, her EGD was
9 estimated to be 5 weeks and 3 days. She was seen and evaluated by Andrea Price, PA, who
10 performed a medical abortion for the plaintiff by administering Mifepristone in the clinic, with
11 additional dosages to be taken as an outpatient. At that visit, an ultrasound was performed which
12 showed an empty uterus, prompting Ms. Price to conclude that Ms. Huang had a pregnancy of
13 unknown location. Ms. Huang was told that she would have close bHCG monitoring, and that
14 she should return to the clinic in 7-14 days for a follow up visit.

15 10. On July 18, 2025, Ms. Huang visited Quest Diagnostics after Megan Forcum,
16 RNP ordered a follow-up bHCG test. The results of that testing showed a bHCG of 1388.
17 Although there was telephonic communication between Defendants and Ms. Huang regarding
18 the results, no follow up evaluation or treatment was performed by Defendants at that time.

19 11. On July 21, 2025, Ms. Huang visited Quest Diagnostics after Stacey Wong, PA
20 ordered another follow-up bHCG test. The results of that testing showed a bHCG of 2436. It
21 appears that no follow up was performed by Defendants at that time. It is unclear from the
22 medical records when Ms. Huang was informed of the July 21, 2025 results.

23 12. On July 22, 2025, per the medical records, Ms. Huang was again seen at Planned
24 Parenthood. At this visit, she was apparently evaluated by April Sandoval, PA, who referred Ms.
25 Huang to David Speiser, M.D. to rule out an ectopic pregnancy.

26 13. Later that day, on her own volition, and sensing that something was wrong, Ms.
27 Huang presented to Garfield Medical Center for vaginal bleeding. At that time, she was
28

1 diagnosed with an ectopic pregnancy and subsequently underwent further medical evaluation and
2 treatment, including a left salpingectomy.

3 14. Ms. Huang was ultimately discharged home, but since the time of her surgery, she
4 has continued to suffer with her condition, and will need additional medical care to correct the
5 injuries she sustained.

6 **FIRST CAUSE OF ACTION**

7 **For Professional Negligence**

8 (Against All Defendants)

9 15. Plaintiff repeats and realleges each and every allegation set forth in Paragraphs 1
10 through 14, inclusive as though fully set forth herein.

11 16. During all periods of time during which Ms. Huang was a patient of Defendants,
12 the Defendants, and each of them, agreed to perform and undertook to perform for Ms. Huang all
13 services necessary to Ms. Huang's care, which included, but was not limited to, observation,
14 examination, evaluation, diagnosis, care and treatment of Ms. Huang, and in so doing, the
15 Defendants, and each of them, established a relationship with Ms. Huang, giving rise to each
16 Defendants' duty to Ms. Huang to provide skillful management of her health condition,
17 including but not limited to observation, evaluation, examination, diagnosis, care and treatment
18 of Ms. Huang.

19 17. Defendants and each of them breached their duty to Ms. Huang to provide skillful
20 management of her health condition, including but not limited to observation, examination,
21 diagnosis, care and treatment.

22 18. At all times herein mentioned, Defendants and each of them so negligently and
23 carelessly cared for, treated and rendered medical services upon the person and body of Ms.
24 Huang and so negligently and carelessly operated, managed, controlled and conducted their
25 services, activities and supervision in connection with Ms. Huang's care and treatment that as a
26 direct and proximate result thereof Ms. Huang was caused to and did suffer the injuries herein
27 alleged.

19. During said periods of time herein above alleged, Defendants and each of them, were negligent, careless and unskillful in their management of the health of Ms. Huang, including but not limited to the observation, examination, diagnosis, care and treatment that were or should have been provided to Ms. Huang.

20. The negligence of Defendants and each of them, includes but is not limited to the following: (1) failing to properly diagnose and treat an ectopic pregnancy, (2) failing to timely follow-up on Ms. Huang's condition after the care was provided, (3) failing to recognize or respond to increasingly worrisome laboratory studies; and (4) failing to otherwise treat her condition in an appropriate or reasonable manner.

21. As a direct and legal result of the aforesaid negligence, carelessness and unskillfulness of Defendants, and each of them, Ms. Huang suffered grave physical and emotional injuries. Plaintiff is informed and believes and therefore alleges that as a result of Defendants' negligence, Ms. Huang suffered the above-referenced injuries.

22. As a further, direct and legal result of said negligence, carelessness and unskillfulness of the Defendants, and each of them, Plaintiff is entitled to recover prejudgment interest under California Code of Civil Procedure §998 and California Civil Code §3291.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. For general damages according to proof;
2. For special damages according to proof;
3. For legal interest on judgment from the filing of this complaint to judgment;
4. For costs of suit;
5. And, for any other and further relief as the Court deems just and proper.

DATED: April 15, 2026

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By: BRADLEY I. KRAMER
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