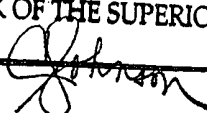




PLD-PI-001

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>YAHWEH,ELOHIM,YAHSHUA</b> <b>BARBARA MASON</b> <b>POST OFFICE BOX 285</b> <b>OAKLAND CALIFORNIA 94604-0285</b> TELEPHONE NO: <b>HOMELESS Unable</b> FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): <b>PLAINTIFF</b>	<b>FOR COURT USE ONLY</b>          <b>FILED</b> <b>ALAMEDA COUNTY</b>  <b>MAY 30 2014</b>  CLERK OF THE SUPERIOR COURT By  Deputy
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Alameda</b> STREET ADDRESS: <b>1225 Fallon Street</b> MAILING ADDRESS: <b>1225 Fallon Street</b> CITY AND ZIP CODE: <b>Oakland, 94612</b> BRANCH NAME: <b>René C. Davidson Courthouse</b>	
PLAINTIFF: <b>BARBARA MASON</b>  DEFENDANT: <b>SECURITAS SECURITY, Et Al</b>	
<input checked="" type="checkbox"/> DOES 1 TO <u>TEN - 10</u> <b>COMPLAINT—Personal Injury, Property Damage, Wrongful Death</b> <input type="checkbox"/> <b>AMENDED (Number):</b> Type (check all that apply): <input type="checkbox"/> <b>MOTOR VEHICLE</b> <input checked="" type="checkbox"/> <b>OTHER (specify):</b> <input type="checkbox"/> <b>Property Damage</b> <input type="checkbox"/> <b>Wrongful Death</b> <input checked="" type="checkbox"/> <b>Personal Injury</b> <input checked="" type="checkbox"/> <b>Other Damages (specify):</b> <b>GBI</b>	
<b>Jurisdiction (check all that apply):</b> <input type="checkbox"/> <b>ACTION IS A LIMITED CIVIL CASE</b> Amount demanded <input type="checkbox"/> <b>does not exceed \$10,000</b> <input type="checkbox"/> <b>exceeds \$10,000, but does not exceed \$25,000</b> <input checked="" type="checkbox"/> <b>ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)</b> <input type="checkbox"/> <b>ACTION IS RECLASSIFIED by this amended complaint</b> <input type="checkbox"/> <b>from limited to unlimited</b> <input type="checkbox"/> <b>from unlimited to limited</b>	CASE NUMBER:  <b>RG 14727367</b>

1. Plaintiff (name or names): **BARBARA MASON**  
 alleges causes of action against defendant (name or names):  
**SECURITAS SECURITY, Et Al EMPLOYEES: OAKLAND KAISER HOSPITAL DATE; JUNE 2013**

2. This pleading, including attachments and exhibits, consists of the following number of pages: **6-8**

3. Each plaintiff named above is a competent adult
- a.  except plaintiff (name):
- (1)  a corporation qualified to do business in California
  - (2)  an unincorporated entity (describe):
  - (3)  a public entity (describe):
  - (4)  a minor     an adult
    - (a)  for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
    - (b)  other (specify):
  - (5)  other (specify):
- b.  except plaintiff (name):
- (1)  a corporation qualified to do business in California
  - (2)  an unincorporated entity (describe):
  - (3)  a public entity (describe):
  - (4)  a minor     an adult
    - (a)  for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
    - (b)  other (specify):
  - (5)  other (specify):

Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

SHORT TITLE: <b>MASON vs. SECURITAS SECURITY, Et Al AND DOES 1-10</b>	CASE NUMBER:
--	--------------

4.  Plaintiff (name):  
 is doing business under the fictitious name (specify):  
  
 and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a.  **except** defendant (name):

(1)  a business organization, form unknown

(2)  a corporation

(3)  an unincorporated entity (describe):

(4)  a public entity (describe):

(5)  other (specify):

c.  **except** defendant (name):

(1)  a business organization, form unknown

(2)  a corporation

(3)  an unincorporated entity (describe):

(4)  a public entity (describe):

(5)  other (specify):
- b.  **except** defendant (name):

(1)  a business organization, form unknown

(2)  a corporation

(3)  an unincorporated entity (describe):

(4)  a public entity (describe):

(5)  other (specify):

d.  **except** defendant (name):

(1)  a business organization, form unknown

(2)  a corporation

(3)  an unincorporated entity (describe):

(4)  a public entity (describe):

(5)  other (specify):
- Information about additional defendants who are not natural persons is contained in Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.
- a.  Doe defendants (specify Doe numbers): 1 THROUGH (10) TEN were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b.  Doe defendants (specify Doe numbers): 1 THROUGH (10) TEN are persons whose capacities are unknown to plaintiff.
7.  Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a.  at least one defendant now resides in its jurisdictional area.
- b.  the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
- c.  injury to person or damage to personal property occurred in its jurisdictional area.
- d.  other (specify):
9.  Plaintiff is required to comply with a claims statute, and
- a.  has complied with applicable claims statutes, or
- b.  is excused from complying because (specify):

**DUE TO HARDSHIPS WITH NO CONTROL OF PLAINTIFF WHO IS  
 BLAMELESS AND UPRIGHT**

SHORT TITLE: <b>MASON vs. SECURITAS SECURITY, Et Al AND DOES 1-10</b>	CASE NUMBER:
--	--------------

10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):
- a.  Motor Vehicle
  - b.  General Negligence
  - c.  Intentional Tort
  - d.  Products Liability
  - e.  Premises Liability
  - f.  Other (specify):

**GREAT BODILY HARM WITH DAMAGES**

11. Plaintiff has suffered
- a.  wage loss
  - b.  loss of use of property
  - c.  hospital and medical expenses
  - d.  general damage
  - e.  property damage
  - f.  loss of earning capacity
  - g.  other damage (specify):

**GREAT BODILY HARM WITH DAMAGES**

12.  The damages claimed for wrongful death and the relationships of plaintiff to the deceased are
- a.  listed in Attachment 12.
  - b.  as follows:

**MOTHER DIED**

13. The relief sought in this complaint is within the jurisdiction of this court.

**THE SUPERIOR COURT OF THE STATE OF CALIFORNIA René C. Davidson Courthouse**

14. Plaintiff prays for judgment for costs of suit, for such relief as is fair, just, and equitable; and for
- a. (1)  compensatory damages
  - (2)  punitive damages

The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):

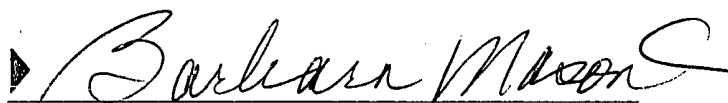
- (1)  according to proof
- (2)  in the amount of: \$ **TEN MILLION DOLLARS**

15.  The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

**ALL NOTED PARAGRAPHS**

Date: FEBRUARY 21, 2014

**BARBARA MASON**  
 \_\_\_\_\_  
 (TYPE OR PRINT NAME)

  
 \_\_\_\_\_  
 (SIGNATURE OF PLAINTIFF OR ATTORNEY)

1 BARBARA MASON  
2 POST OFFICE BOX 285  
3 OAKLAND, CALIFORNIA 94604  
4  
5  
6

7 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8  
9 IN AND FOR THE COUNTY OF ALAMEDA  
10

11 BARBARA MASON,  
12  
13 Plaintiff,

Case No: \_\_\_\_\_

14 vs.

15 SECURITAS SECURITY, and  
16 KAISER HOSPITAL

COMPLAINT FOR DAMAGES  
UNLIMITED CIVIL CASE

17 As DOES 1-10, inclusive,  
18 Defendants

19  
20  
21  
22 PLAINTIFF alleges:

23 Defendants Securitas Security and Kaiser Permanente Foundation Hospital –  
24  
25 City of Oakland, is and at all times mentioned herein was a Security Agency  
26 authorizing within the state of California, and existing under the laws of the State of  
27  
28 California.

COMPLAINT FOR DAMAGES  
UNLIMITED CIVIL CASE

1 At all times mentioned herein, defendants was an employee of Securitas  
2 Security and Kaiser Permanente Foundation Hospital in City of Oakland and in doing  
3 so committed these heinous malicious acts described hereafter and acted within the  
4 course and scope of their employment within the County of Alameda.  
5

6  
7 PLAINTIFF is ignorant as to the true names and each true capacity as it applies  
8 to each defendant and herein files this complaint as DOES 1-10, inclusive, and  
9 therefore sues each and every defendant, by true names or by fictitious names.  
10

11 PLAINTIFF have the rights to amend and will amend such complaint when  
12 informed to allege the true names and each capacity when information is ascertained.  
13

14 PLAINTIFF believes and in informed and believes to be true each and every  
15 fact presented along with details and witnesses alleges that each of these defendants  
16 are negligently and responsible for all injuries sustained and suffered by and from  
17 their malicious acts in some manner for this unnecessary occurrences herein alleged,  
18 and that all of PLAINTIFF's bodily injuries as herein subscribed and alleged to be true  
19 and factual were truly caused by and from these acts by each individual who  
20 contributed to the damages and charges suffered by PLAINTIFF due to their  
21 negligence, wrongful decisions and means to show off and make PLAINTIFF suffer.  
22  
23  
24

25 Thereby PLAINTIFF is informed and believes and thereon stated the true and  
26 factual occurrences and that at all times herein mentioned each of these defendants are  
27  
28

1 sued including herein as DOES 1-10, inclusive, who was the agent and employee of  
2 each defendants who was at all times acting within their purpose and scope of such  
3 and employed by either Securitas Security and Kaiser Permanente Foundation  
4 Hospital in the city of Oakland, California.  
5

6  
7 At all times herein mentioned, defendants and DOES 1-10, inclusive, were the  
8 agent or servant and employees of defendants or codefendants, and in doing these  
9 things hereinafter alleged were acting within the scope of their authority as such  
10 agents, servants, or employees and with their permission and consent of these  
11 defendants or co-defendants.  
12  
13

14 On or about June 20, 1013, PLAINTIFF who was in Kaiser Permanente Hospital  
15 in Oakland, California and was visiting her mother in room 922A was attacked,  
16 handcuffed, beaten down, forced to stand in attention over 4 hours waiting to be  
17 arrested without being relieve, but constantly being restrained in a forceful position un  
18 natural to the normal body posture and position, creating an hardship on the spinal  
19 alignment and pressures onto the nervous system.  
20  
21

22 At such time and place these defendants performed these tortuous acts with  
23 menace, evil, great bodily harm and injuries through their carelessly attacking  
24 PLAINTIFF, who at never shown threaten, life, the same as Trey Von Martin, and the  
25 Dunn case matter that Plaintiff is Blameless and upright and never did any actions to  
26  
27  
28

1 cause this handcuffing and treatment. Trey Von Martin who was killed along with the  
2 victim who also was Black in the Dunn case matter both in the State of Florida.  
3  
4 Proving to Blacks, that there are separate laws concerning racism is bold and justice is  
5 denied. Officers, who attacked twisted, tossed Plaintiff off the floor beneath while she  
6 was being wrestled to the floor for handcuffing a weakly 90 pound non-threaten  
7 female as a Black race and suffering extreme pains as witnesses watch with surprise  
8 while this was occurring who will testify non-threaten, unnecessary and never  
9 required or needed by fellow employees of Kaiser Hospital in the City of Oakland,  
10 California. Plaintiff remember the top security officer's statements to Plaintiff that he is  
11 teaching her a lesson in her Black history.  
12  
13  
14

15 Defendants took PLAINTIFF purse and kept it out of her sight while they stole  
16 her cash monies amounts to \$2,500.00 which was used to purchase a second hand  
17 vehicle. This money along with keys was in complete control and positions these  
18 security officer employed by Kaiser Permanente Hospital in Oakland, California  
19 location at MacArthur Blvd.  
20  
21  
22

23 Plaintiff sustained major extreme Injuries such as physical location of the: Left  
24 knee, neck, shoulder, right arm, back, spine, hip, lower back, nerves, hands\right  
25 thumb, legs, and area of her mouth. These officers attacked her without cause by  
26 wrestled Plaintiff to the floor as they twisted her body forcing an extreme painful  
27  
28

1 unnatural positions, as each forced their handcuffed tightly around her narrow wrists,  
2 each were forcefully pulling her shoulders out of alignment, causing extreme injuries  
3 to date she is still suffering extreme pains a year later in both legs, knees, shoulders,  
4 arms, nerves, back, hands and body parts. Now, Plaintiff has uncontrolled tremors  
5 and nerve attacks to present date.  
6  
7

8 These particularity facts are sufficient to established that defendants are not  
9 only liability but also responsible for incurring, causing these unnecessary unnatural  
10 injuries towards Plaintiff without merit or threats by Plaintiff who to date is blameless  
11 and in right standings for these procedures.  
12  
13

14 Again repeat Plaintiff never at any time cause, threaten or implied acts of  
15 violence immediate threats at all during this time or at any other moments during this  
16 altercation caused by these defendants. Under the color of law, these facts are  
17 established by these individuals and each one is liable to PLAINTIFF why now has the  
18 legal and lawful rights to recover all injuries in the amounts of TEN MILLION  
19 DOLLARS by officers' who willingly choose to do their wrongful acts only because  
20 Plaintiff is an AFRICAN AMERICAN.  
21  
22  
23

24 I declare under penalty of perjury under the laws of the State of California that  
25 the foregoing is true and correct.  
26

27 Dated: Thursday, May 29, 2014

By   
Plaintiff, Barbara MASON  
28



1 BARBARA DOBARD  
2 POST OFFICE BOX 285  
3 OAKLAND, CALIFORNIA 94604  
4  
5  
6



7 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8  
9 IN AND FOR THE COUNTY OF ALAMEDA  
10

11 BARBARA DOBARD,

12 Plaintiff,

13 vs.

14 KAISER HOSPITAL and SECURITAS  
15 SECURITY, and DOES 1-10,  
16

17 Defendants  
18  
19

Case No.: \_\_\_\_\_

PLAINTIFF TO OBTAIN RECORDS,  
SUMMARY REPORT, INVESTIGATION  
LOG, IR REPORTS NOS. 103 &  
104, OBTAINING RECORDS/REPORTS  
FROM LAW ENFORCEMENT  
AGENCY; SECURITAS SECURITY

20  
21 PLAINTIFF is hereby requesting from Defendants, Securitas Security Agency

22 Department records of I.R. Nos. 103 and number 104 complete details, notes and

23 comments along with summary reports by and from in the City of Oakland, Kaiser

24 Permanente Hospital in the City of Oakland, for the State of California and County of

25 Alameda  
26  
27  
28

PLAINTIFF TO OBTAIN RECORDS, SUMMARY REPORT, INVESTIGATION LOG, IR REPORTS  
NOS. 103 & 104, OBTAINING RECORDS/REPORTS FROM LAW ENFORCEMENT  
AGENCY; SECURITAS SECURITY

1 These reports, records, summary, remarks, notes, logs, identification of

2 employees involved with assault dated in and during the month of June 2013. Such

3 documents requested are hereby governed by the United States Government Code §§

4 58097 - 68097.10 of these sections.

5 For good cause and reasons these production of all records and requests hereby

6 made upon and to defendants also known as Securitas Security Agency and Kaiser

7 Permanente Hospital in the City of Oakland, County of Alameda, and State of

8 California are hereby setting forth in full details as the materiality towards these issues

9 involved in this case and with this matter.

10 This Law Enforcement Agency has these desired documents in their possession

11 and must immediately turn them over to Plaintiff since documents, reports, log,

12 summary and Investigation Reports are under their control. These factual bases are for

13 this legal law suits for this case with legal conclusion and these materials are necessary

14 for the successful prosecution against defendants for and in these proceedings.

15 I declare under penalty of perjury under the laws of the State of California that

16 the foregoing is true and correct.

17 Dated: Friday, December 13, 2013

18 Plaintiff, Barbara Dobard

1 **CLAIM INFORMATION AND CLAIM FORM**  
2  
3

---

4 **THE CLAIMANT: BARBARA MASON**

5 ACTION DATED: ..... JUNE 2013

6 FILE RECORD:.....JUNE 28, 2013

7 NOTIFICATION GIVEN TO: Victim Compensation and Government Claims  
8 Board @630 K Street, Sacramento AND Cc: State Of California Governor, State  
9 Officials & Washington  
10

11 TODAY'S ACTION NOTIFICATION DATED:.....29 May 2014

12  
13 This claim to be filed for losses Plaintiff, Barbara believed was caused by the  
14 action and inaction of this agency.  
15

16 This claim incurred: Damages to person, reimbursement for losses, benefits,  
17 salary and expenses.  
18

19 This claim for damages caused by these defendants and their agency directly  
20 involved and Plaintiff who believes and experience to date damages and suffering  
21 caused by and from these individuals who represents this agency. Plaintiff suffered  
22 monetary loss and long term bodily injuries to date, Plaintiff has no medical insurance  
23 coverage and could not afford to sustain longer damages through government  
24 process. This case should never happen and due to ego and power of employees  
25 forced this case to go to court.  
26  
27  
28

COMPLAINT FOR DAMAGES  
UNLIMITED CIVIL CASE

1 FULL NAME: Barbara MASON, Claimant

2 MAILING & CONTACT INFORMATION PLAINTIFF'S ADDRESS:

3 a. P. O. Box 285, Oakland, CA 94604;

4 DATE OF INCIDENT: JUNE 2013 Caused damages and injuries

5  
6 3. **EMPLOYEES RESPONSIBLE** FOR ALL DAMAGES INCURRED BY  
7 SECURITAS SECURITY: **HAROLD BONTON**, BLACK OVERWEIGHT BIG  
8 MAN responsible for all Injuries & Damages incurred to plaintiff who suffered  
9 extreme massive body damages; who was personally informed prior to being  
10 handcuffed that plaintiff was only visiting her mother on the 9<sup>th</sup> floor and did  
11 not cause any disturbances, or and never created any threats or performed any  
12 threaten acts to these police officers, since being Black knows that she would be  
13 a victim of harsh treatments or even killed by these police, such as the same  
14 from the case of Trey Van Martin. Plaintiff kept, still this did not work at all she  
15 was physically hurt and damages in all parts of her body a 90 pound thin bone  
16 Black female

17 4. **EMPLOYEE JOE SAP**....CORRECT spelling of last name is uncertain and he  
18 refused to supply later to plaintiff when she returned for details, she was denied  
19 by and with the support of his co-workers., Plaintiff was denied copy of the IR  
20 103 supplemental report on the date of occurrence. This employee was the one  
21 giving the orders to ruff plaintiff up and handcuff her without any cause, even  
22 the workers who witness his demands and the wrongful treatment of Plaintiff,  
23 stated "this was not necessary and there were no caused for such hardness and  
24 roughness taken against Plaintiff, who was quiet and submissive during the  
25 entire event. The same as Oscar Grant, who was sitting docile and quiet, yet  
26 police hit him in the face and killed him in the back. {Plaintiff who believed  
27 same would happen to her} only because she was Black, and voiced this to  
28 employee Joe Sap. He would have never done such at another race, but believed  
he could get away because plaintiff was Black and dump that nothing would  
ever happen to him because this country justice is against Blacks.

1 5. **EMPLOYEE KUNUKE**, there was also description of a tall very tall Asian male  
2 who was involved with this racial harassment who personally spoken with  
3 Plaintiff's mother and was physically along with verbal information and being  
4 informed that Plaintiff Barbara is her daughter, prior to Plaintiff being taken and  
5 ruffling handcuffed. Robert..... Check 5-employees involved on summary &  
6 Investigation Report Numbers 103 and 104.

7 **6. EMPLOYEE INVOLVEMENT**

8 a. **ROBERT FOSTER** contact Tele: information: (925) 324-2135, Position  
9 title Supervisor/Security, have been informed and aware of damages  
10 Plaintiff suffered on the date of incident. Who also refused to supply  
11 Plaintiff with copies of I.R. 103 report even though it involved Plaintiff  
12 personally who was being denied three times.

13 b. **PATIENT** relationship mother to Plaintiff who suffered lies told by  
14 defendants and damages suffered to personal reputation and slanderous  
15 acts of embarrassment to her reputation and character as well as her state  
16 of mind and physically pains suffered emergency acts against her  
17 without probable cause of any evidence of dangerous or threaten acts  
18 caused by Plaintiff at any time during this malicious acts taken against  
19 her.

20 c. **PLAINTIFF SUFFERED** pains for over four (4) + forced to stand in  
21 attention without any relief for a prolong time, handcuffed too tight and  
22 causing exclusion pains through hours while waiting for the Oakland  
23 Police to arrest her and transfer her to jail.

24 d. **ROOM 922B**Plaintiff's mother was admitted, from 12:15 p.m. on after  
25 Officer approach Plaintiff's mother questioning whether she had a Power  
26 of Attorney and designation of her funds information, at this time  
27 Plaintiff knew hard force would be placed upon Plaintiff. From this  
28 stated time to present to day, her mother has had a heart attack and now  
needed assistance in breathing, her health has gone negative due to the  
action of defendants.

1 7. DAMAGES: Hardship, emotional damages, pains, injuries, are continuing to  
2 date and anticipated in the future. This claim is an unlimited civil case. Total  
3 amount explanation computations for total amount undetermined yet injuries  
4 ongoing to date and expect to have in the future. Expenses expected to continue  
5 to have in the future. Body out of alignment, hip pains, right nerve  
6 uncontrollable shaking, right shoulder pains, back and upper shoulder pains,  
7 swelling behind left knee, front knee damages and pains incurred due to men  
8 twisting, pulling, throwing forcing down 90 pound female, who never threaten,  
9 caused forced who never acted in any threaten manner. Plaintiff has over  
10 twenty witnesses to testify, action taken against her was never necessary.  
11

12 8. DESCRIBE SPECIFIC: Thrown down with great force by four men, while  
13 one applied pressures against the body within unnatural way and forcing the  
14 body, bones and muscles at great massive levels to be twisted, turned against the  
15 natural and normal process for the body to retain and have control of it regular  
16 position or position without tears, pulls, or extreme forcing against natural body  
17 positions.  
18

19 9. DESCRIBE DETAILS: Plaintiff, personally informed Black Security  
20 personnel by introducing herself to him and giving him details concerning my  
21 name is Barbara and I am here visiting my mother in this room. Prior to being  
22 attacked, wrestled and handcuffed, as Plaintiff looked up at this Black man, she  
23 said to him You know the TRUTH, facts, and what is right DON'T allowed this  
24 to be done to me. This Black security man looked at Plaintiff and remarked with  
25 replied, 'IT DOE NOT MATTER.'" PLAINTIFF, being Afro-American female,  
26 knew from history, this Black man was going to support any wrongs done by  
27 these racist non-Black members. In addition for support of this unnecessary  
28

1 roughness, Plaintiff also watch as their tall ASIAN Male walked into the  
2 patient's room belonging to Plaintiff's mother and he personally asked the  
3 patient who was lying in her bed on the ninth floor, "WHO IS THIS WOMAN",  
4 the patient replied, SHE IS MY DAUGHTER. All before Plaintiff was handcuffed  
5 two of their own officers knew the facts and truth, but after their knowledge  
6 plaintiff was handcuffed and taken away and charged with trespassing on the  
7 Kaiser Foundation Hospital-Oakland. Why was this done So, Plaintiff would be  
8 taught a lesson as was personally stated to Plaintiff by and from Lead  
9 Supervisor Joe Sap....., Facts knowledge was given prior to being wrestled  
10 down to the floor and body forcible twisted, secondly, Plaintiff never resisted in  
11 any form or manner, knowing how cops are with Blacks and their injustices, lies  
12 and cover-ups, Plaintiff kept extremely calm.

14 10. AGENT IS RESPONSIBLE: Knowledge and onsite, training and orientation  
15 teaching done by agencies that are responsible for their employees' knowledge,  
16 insights, actions, which used extreme force when not required, necessary or  
17 threaten.

19 11. CLAIMANT'S CLAIM: All expenses incurred to date and future doctors and  
20 corrective visits, loss of wages and additional general damages sustained  
21 currently and continued to the future due to time heading and long termed  
22 damaged, any future medical expenses. These claims are based upon injuries,  
23 damages and/losses. This claim is made on behalf of Plaintiff who's identified as  
24 the daughter of Kaiser Permanente Hospital patient in room 912A.

26 12. The following day, Plaintiff mother was taken to ICU, Plaintiff believes patient  
27 condition worsen due to the crisis her daughter suffered by defendants.

28 13. **WITNESSES IN CASE:** Name: Valerie Farrell, RN, BSN

1 Position Title: Assistant Nurse Manager

2 Physical Location: 3<sup>rd</sup> Floor, ICU/TCU

3 Building: Kaiser Foundation Hospital, 280 W.  
4 MacArthur Blvd, #3022, Oakland, California 94611.

5 Name: Myrna A. Concepcion, RN

6 Position Title: Assistant Nurse Manager

7 Physical Location: 9th Floor,

8 Medical/Surgical/Telemetry/Stroke

9 Building: Kaiser Foundation Hospital,  
10 280 W. MacArthur Blvd, Oakland, California 94611.

11 Name: James (Jim) Hopkins, RN

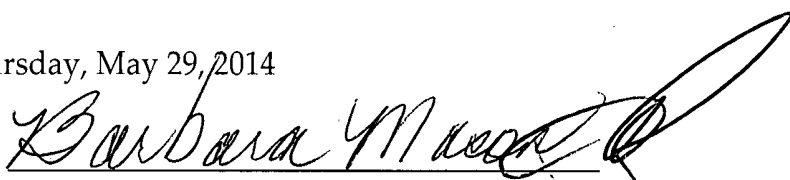
12 Position Title: Assistant Nurse Manager

13 Physical Location: Intensive Care and Transitional  
14 Care Unit

15 Building: Kaiser Foundation Hospital,  
16 280 W. MacArthur Blvd, Suite 3022  
17 Oakland, California 94611.

18  
19  
20 Cc: Victim Compensation and Government Claims Board @  
21 630 K Street, Sacramento, California

22  
23 DATED: Thursday, May 29, 2014

24   
25 Claimant, in the above described case

26 Plaintiff, Barbara MASON  
27  
28

COMPLAINT FOR DAMAGES  
UNLIMITED CIVIL CASE



SHERIFF OF ALAMEDA COUNTY TO  
SERVICE DEFENDANTS

---

CASE TITLED:

MASON VS. SECURITAS  
SECURITY AND KAISER  
HOSPITAL DOES 1-10  
INCLUSIVE