

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MULTNOMAH

MEGAN HUNT	)	No.
	)	
Plaintiff,	)	
	)	COMPLAINT
vs.	)	
	)	( MEDICAL MALPRACTICE)
KAISER FOUNDATION HOSPITALS, a California	)	
Corporation; NORTHWEST PERMANENTE, PC,	)	
an Oregon Professional Corporation, KAISER	)	
FOUNDATION HEALTH PLAN OF THE	)	
NORTHWEST, doing business as KAISER	)	
PERMANENTE, An Oregon Corporation,	)	
and JOHN DOE DOCTOR.	)	
Defendants.	)	CLAIM NOT SUBJECT TO
	)	MANDATORY ARBITRATION
	)	Fee Authority: ORS 21.160(1 (c)
	)	\$50,000 or more and less than
	)	\$1,000,000 (\$560.00)
	)	Prayer:\$250,000

COMES NOW plaintiff and alleges as follows:

1.

At all times material herein, KAISER FOUNDATION HOSPITALS was an active foreign non-profit corporation authorized to and doing business in the state of Oregon and operating Kaiser facilities in and around the Portland Metropolitan area. At all material times herein, defendant, NORTHWEST PERMANENTE, PC., was an active Oregon professional corporation with a principle place of business in Multnomah County, County, Oregon.

2.

At all times material herein, Defendant KAISER FOUNDATION HEALTH PLAN OF THE NORTHWEST, doing business as KAISER PERMANENTE, was an active Oregon

1 Corporation.

2 3.

3 AT ALL TIMES MATERIAL HEREIN, defendant, JOHN DOE DOCTOR was an agent  
4 employee of defendant NORTHWEST PERMANENTE, PC.

5 4.

6 AT ALL TIMES MATERIAL HEREIN, Plaintiff was a member of defendant, KAISER  
7 FOUNDATION HEALTH PLAN OF THE NORTHWEST. Hereinafter, all defendant entities  
8 and individuals are collectively referred to as "Defendant".

9 5.

10 Defendant, John Doe Doctor was a physician licensed by the state of Oregon with a  
11 specialty in anesthesiology.

12 6.

13 At all times material herein, Defendant, John Doe Doctor, was an employee and/or agent  
14 of, either actual or apparent, of Defendant acting in the course and scope of his employment  
15 and/or agency for Defendant.

16 7.

17 On or about September 19, 2015, Plaintiff was admitted to Kaiser Permanente located at  
18 10180 SE Sunnyside Road, Clackamas, OR 97015 for the delivery of her child. On or about  
19 September 20, 2015, as part of the delivery, Defendant John Joe Doctor administered an epidural.  
20 In doing so, Defendants were negligent in one or more of the following particulars, which caused  
21 injuries to the Plaintiff as described below:

22 1. In not reasonably identifying the epidural injection site;

23 2. In attempting multiple epidural injections without having obtained adequate  
24 information as to the cause of prior epidural injection failures;

25 3. In attempting an epidural injection without adequate saline solution;

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1 4. In inadequately advising plaintiff of the risks of the epidural injection;

2 5. In injecting air into the spinal canal.

3 6. In piercing the dural.

4 8.

5 As a result of the forgoing negligence of Defendants, Plaintiff suffered pneumocephalus,  
6 subcutaneous emphysema, headache, vomiting and other related symptoms.

7 9.

8 As a further result of foregoing, Plaintiff, after discharge following the delivery of her  
9 child, was readmitted the following day for symptoms related to the symptoms caused by  
10 Defendants' negligence.

11 10.

12 As a further result of foregoing, Plaintiff suffered significant pain, emotional distress, and  
13 interference with her normal and usual activities, including bonding with her just born child, all  
14 to her non- economic damages in the sum of \$250,000 and such further sums as may be shown at  
15 the time of trial.

16 11.

17 In addition, Plaintiff suffered economic damages by reason of delayed recovery from  
18 delivery, all in a sum to be determined at trial.

1 WHEREFORE, plaintiff prays for judgment against Defendants follows:

- 2 (a) For non-economic damages in the sum of \$250,000, and economic damages as  
3 may be shown at the time of trial;
- 4 (b) For costs and disbursements incurred herein; and
- 5 (c) Such further relief as the court deems just and equitable.
- 6
- 7

8 DATED this: September 20, 2017

9 DANIEL C. LORENZ  
10 Attorney at Law

11 /s/ Daniel Lorenz

12 \_\_\_\_\_  
13 Daniel C. Lorenz  
14 Attorney for Plaintiff  
15 Bar No. 78287