## CIV-180802-CIV-DS1819989-CASEEN-083702



## Scanned Document Coversheet

System Code:

CIV

Case Number:

DS1819989

Case Type:

CIV

Action Code:

CASEEN

Action Date:

08/02/18

Action Time:

8:37

Action Seq:

0002

Printed by:

DMOND

THIS COVERSHEET IS FOR COURT PURPOSES ONLY, AND THIS IS NOT A PART OF THE OFFICIAL RECORD.
YOU WILL NOT BE CHARGED FOR THIS PAGE

Complaint and Party information entered



PLD-PI-001

· · · · · · · · · · · · · · · · · · ·	1 CD-1 1-001
ATTORNEY OF PARTY WITHOUT ATTORNEY (Name, State Bar number, and address)	FOR COURT USE ONLY
Sandra II. Castro, Esq. SBN 207475 Law Offices of Sandra II. Castro, Inc.	
3200 Inland Empire Blvd. Suite 265	
Ontario, CA 91764	•
TELEPHONE NO. 9099892700 FAX NO. (Optional): 9099892733	FILED
E-MAIL ADDRESS (Optional) kathleon (a) lawscrvices on line.com	SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN BERNARDINO
ATTORNEY FOR (Name). Plaintiff - Josefina Velazquez	SAN BERNARDINO DISTRICT
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Bernardino	AUG 0 2 2018
STREET ADDRESS: 247 W. Third St.	A00 <b>02</b> 2010
MAII ING ADDRESS.	L. «
GINY AND ZIP GODE. San Bernardino, CA 92415	BY NOVAMENTAL DEBUTE
BRANGII NAME. San Bernardino Superior Court - Civil	DAISY MONDRAGON, DEPUTY
PLAINTIFF: Josefina Velazquez	
DEFENDANT: Kaiser Permanente International, Kaiser Permanente	
High Desert/Victorville Medical Offices, and	<b>₹</b> ₹
DOES 1 TO 25	
COMPLAINT—Personal Injury, Property Damage, Wrongful Death	9
MENDED (Number): Type (check all that apply):	·
MOTOR VEHICLE OTHER (specify):	
Property Damage Wrongful Death	
Personal Injury Other Damages (specify):	
Jurisdiction (check all that apply):	CASE NUMBER.
ACTION IS A LIMITED CIVIL CASE	
Amount demanded does not exceed \$10,000 exceed \$25,000	
ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)	CIV DS1819989
ACTION IS RECLASSIFIED by this amended complaint	ria na in i
from limited to unlimited	100
from unilmited to limited	140203-0049 \$435-10
Plaintiff (name or names): Josefina Velazeucz	
alleges causes of action against defendant (name or names):	
Kaiser Permanente International, Kaiser Permanente High Desert/Victor	ville Medical Offices, Does 1 to 25
2. This pleading, including attachments and exhibits, consists of the following number of policy	ages Five (5)
3. Each plaintiff named above is a competent adult	
a. except plaintiff (nan)):	
(1) a corporation qualified to do business in California	
(2) an unincorporated entity (doscribe):	
(3) a public entity (describe):	
(4) a minor an adult  (a) for whom a guardian or conservator of the estate or a guardian	
(a) for whom a guardian or conservator of the estate or conservator of the estate or conservator of the estate or conservator or conservator or conservator of the estate or conservator or co	Idian po mom nas ocem appointed
(5) other (specify):	
b. except plaintiff (name):	
(1) a corporation qualified to do business in California	
(2) an unincorporated entity (describs):	
(3) a public entity (describe):	
(4) a minor an adult	
(a) for whom a guardian or conservator of the estate or a gua	rdian ad litem has been appointed
(b) other (specify):	
(5) other (specify):	
A control of the cont	to the most 2
Information about additional plaintiffs who are not competent adults is shown in At	(achment 3. Page 1 of 3

DI	DI	AA.

SHORT TITLE:	CASE NUMBER:
Velazquez V. Kaiser Permanente International, et al.	
4. Plaintiff (name): is doing business under the fictitious name (specify):	· V P
and has complied with the fictitious business name laws.  5. Each defendant named above is a natural person	Kulser Permanente High Desert Mictorville Medical Offices
a.   except defendant (name): Kaiser Permanente Int. c.   except defendant (1) a business organization, form unknown (1)   a corporation (2) a corporation (2) a corporation	
(4) a public entity (describe):	olic entity (Jescribe):
(5) other (specify): (5) other	(specily);
	<b>5</b> ~
b. sxcept defendant (name): d. except defendant	
	siness organization, form unknown
	poration nincorporated entity (describe):
(4) a public entity (describe):	olic entity (describe):
(5) other (specify): (5) other	(specify):
Information about additional defendants who are not natural persons is contained in	n Attachment 5.
6. The true names of defendants sued as Does are unknown to plaintiff.	
a. Doe defendants (specify Doc numbers): 1 to 10 were named defendants and acted within the scope of that agency or employment.	the agents or employees of other
b. Doe defendants (specify Doe numbers): 11 to 25 are p plaintiff.	ersons whose capacities are unknown to
7. Defendants who are pined under Code of Civil Procedure section 382 are (names	<del>;):</del>
8. This court is the proper court because  a. at least one defendant now resides in its jurisdictional area.	
<ul> <li>a at least one detendant now resides in its jurisdictional area.</li> <li>b the principal place of business of a defendant corporation or unincorporated as</li> </ul>	ssociation is in its jurisdictional area.
<ul> <li>c.  injury to person or damage to personal property occurred in its jurisdictional and.  other (specify):</li> </ul>	
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):	

	PLD-PI-001
SHORT TITLE:	CASE NUMBER:
Velazquez V. Kaiser Permanente International, et al.	
<ul> <li>10. The following causes of action are attached and the statements above apply to each causes of action attached):</li> <li>a Motor Vehicle</li> <li>b General Negligence</li> <li>c Intentional Tort</li> <li>d Products Liability</li> <li>e Premises Liability</li> <li>f Other (specify):</li> </ul>	n (each complaint must have one or more
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):	
All other remedies deemed just by this court	
12 The damages claimed for wrongful death and the relationships of plaintiff to the a listed in Attachment 12. b as follows:	e deceased are
13. The relief sought in this complaint is within the jurisdiction of this court.	
14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equita a. (1) compensatory damages (2) punitive damages  The amount of damages is (in cases for personal injury or wrongful death, you mean of the amount of the amount of: \$	
15. The paragraphs of this complaint alleged on information and belief are as follows:	ws (specify paragraph numbers):
paragraphic in the complete and action action and action action and action action action action and action	
Date: 08/01/2018 Sandra H. Castro, Esq.	anden Japa
	SIGNATURE OF PLAINTIFE OR ATTORNEY)

			PLD-PI-001(4
HORT TITLE: /clazquez V. Kaiser Pe	ermanente International, et al.	CASE NUMBER	
(number) ATTACHMENT TO	CAUSE OF ACTION—  Complaint Cross Complain	•	Page 4
Prem.L-1. Plaintiff <i>(nan</i> alleges the	of action form for each cause of action.)  ne): Josefina Velazquez.  e acts of defendants were the legal (proximate)  08/12/2016 plainti	) cause of damages to plaintiff. ff was injured on the following pre	mises in the following
Ms. Vela instructe wheels, a instructe not limit	escription of premises and circumstances of in azquez arrived at the Kaiser location a ed by a Kaiser employee to have a seat rolled out from under her as Ms. Velas ed. Ms. Velazquez fell to the concrete p ted to her head and right side of her bo d in the Emergency Room within Kais	nd checked in for her appoint on a particular chair. The claquez was in the process of a ground, sustaining several in dy. Ms. Volazquez was then	hair, which had laking a scat as njuries including but I taken to be
op K O	ount One—Negligence The defendants who perated the described premises were (names). Kaiser Permanente International, Kaise Offices  Does I to 25		
or (n K O	ount Two—Willful Failure to Warn [Civil Code maliciously failed to guard or warn against a chames):  Laiser Permanente International, Kaiser Poffices  Does 1 to 25	dangerous condition, use, structure	e, or activity were
Prem.L-4. Co	ount three Dangerous Condition of Public of Which a dangerous condition existed were (no area Permanente International, Kaise) offices    V Does 1 to 25	c Property The defendants who of ames): r Permanente High Descrt/V	ictorville Medical
		es of the defendant public entity. Indants who were the agents and	•
b Tr	Does to  ne defendants who are liable to plaintiffs for oth described in attachment Prem.L-5,b	er reasons and the reasons for th	neir liability are

	PLD-PI-001(2
SHORT TITLE: Velazquez V. Kaiser Permanente International, et	al.
2 (two) CAUSE OF ACTIO	ON—General Negligence Page 5
ATTACHMENT TO Complaint Cross - Comp	plaint
(Use a separate cause of action form for each cause of action	n.)
GN-1. Plaintiff (name): Josefina Velazquez	
alleges that defendant (name): Kaiser Permane Desepイ / Vi(	ente International, Kaiser Permanente High Hosville Medical Offices
Does 1 to 25	
was the legal (proximate) cause of damages to plaint negligently caused the damage to plaintiff on (date): August 12, 2016 at (place): 14011 Park Ave, Victorville, CA	tiff. By the following auts of omissions to act, defendant
(description of reasons for liablilty):	
Ms. Velazquez arrived at the Kaiser loc	ation and checked in for her appointment. She

Ms. Velazquez arrived at the Kaiser location and checked in for her appointment. She was instructed by a Kaiser employee to have a seat on a particular chair. The chair, which had wheels, rolled out from under her as Ms. Velasquez was in the process of taking a seat as instructed. Ms. Velazquez fell to the concrete ground, sustaining several injuries including but not limited to her head and right side of her body. Ms. Velazquez was then taken to be evaluated in the Emergency Room within Kaiser Permanente immediately following ker fall.