3       Hea Galia, LP       DEC 02.2         433 North Camden Drive, 4 <sup>th</sup> Floor       Beverly Hills, CA 90210       Sherri R. Carler, Execut         5       Fassimile: (480) 393-4433       By       N. VA         6       Attorneys for Plaintiffs       N. VA         7       State of Emanuele Seu, by and through its       Administrator Matthew Yu         9       SUPERIOR COURT OF THE STATE OF CALFFORNIA         10       SUPERIOR COURT OF THE STATE OF CALFFORNIA         11       COUNTY OF LOS ANGELES—WEST DESTRICT         12       NATALE SEU, an individual; MARIA         13       VITTORIA LODDO, an individual;         14       FISIA SEU, an individual; ESTATE OF         15       Administrator Matthew Yu;         16       VITTORIA LODDO, an individual;         17       VITTORIA LODDO, an individual;         18       Plaintiffs,         19       individual; THOMAS P. GRAHAM, M.D., an         10       V.         11       V.         12       NATALE SETRO, M.D., an individual;         13       MDDLEKAUFP, M.D., an individual;         14       Plantiffs,         15       Administrator Matthew Yu;         16       V.         17       V. <th>Þ</th> <th></th> <th></th>	Þ		
2       Giacomo Gallal, Bar No. 227544       Sugerior Court of Court of Court of Los A         3       Hua Galla, LIP       DEC 0.2.2         433 North Canden Drive, 4 <sup>th</sup> Floor       Berri R. Carter. Execut         9       Phone: (310) 279-5239       Sherri R. Carter. Execut         9       Facsimile: (480) 393-4433       By         6       Attorneys for Plaintiffs       N. VA         7       Natale Seu, Maria Vittoria Loddo, Efisia Seu, and Estato of Emanuele Seu, by and through its       Administrator Matthew Yu         9       SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES—WEST DISTRICT         10       SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES—WEST DISTRICT         11       UNLIMITED JURISDICTION         12       NATALE SEU, an individual; ESTATE OF EALIFORNIA COUNTY OF LOS ANGELES—WEST DISTRICT         13       VITTORIA LODDO, an individual; ESTATE OF CALIFORNIA COUNTY OF LOS ANGELES—WEST DISTRICT         14       Plaintiffs,         15       Plaintiffs,         16       V.         17       THE REGENTS OF THE UNIVERSITY         16       V.         17       THE REGENTS OF THE UNIVERSITY         19       Individual; RAISER FOUNDATION         18       REDICAL GALIFORNIA, PLENKAN, M.D., an individual;	1	Nicholas T. Hua, Bar No. 231035	FILED
4       Hua Gallai, LLP       DEC 02.2         4       Beverly Hills, CA 90210       Sherri R. Carter. Execut         9       Phone: (310) 279-5239       By         6       Attorneys for Plaintiffs       By         7       Natale Seu, Maria Vittoria Loddo, Efisia Seu, and       Estate of Emanuele Seu, by and through its         8       Administrator Matthew Yu       By       N. VA         9       SUPERIOR COURT OF THE STATE OF CALIFORNIA       COUNTY OF LOS ANGELES – WEST DISTNICT         10       SUPERIOR COURT OF THE STATE OF CALIFORNIA       COUNTY OF LOS ANGELES – WEST DISTNICT         11       UNLIMITED JURISDICTION       SC1217255         12       NATALE SEU, an individual; BSTATE OF EMANUELE SEU, by and through its       Case No.       SC1217255         13       VITTORIA LODDO, an individual; ESTATE OF EMANUELE SEU, by and through its       Case No.       COMPLAINT FOR DAMAGES AND O         14       Plaintiffs,       I. MEDICAL MALPRACTICE       2. WRONGFUL DEATH         15       Plaintiffs,       I. MEDICAL MALPRACTICE       2. WRONGFUL DEATH         16       V.       I. MEDICAL MALPRACTICE       2. WRONGFUL DEATH         17       THE REGENTS OF THE UNPVERSITY       OF CALIFORIA, a public enilog;       LAURA M. DESTRO, M.D., an individual;         18 <t< th=""><th>2</th><th>Giacomo Gallai, Bar No. 227544</th><th>Superior Court of California County of Los Angeles</th></t<>	2	Giacomo Gallai, Bar No. 227544	Superior Court of California County of Los Angeles
<ul> <li>Beverly Hills, CA 90210</li> <li>Sherri R. Carter, Execut</li> <li>Facsimile: (480) 393-4433</li> <li>Attorneys for Plaintiffs</li> <li>Natale Seu, Maria Vittoria Loddo, Efisia Seu, and Estate of Emanuele Seu, by and through its</li> <li>Administrator Matthew Yu</li> <li>SUPERIOR COURT OF THE STATE OF CALFFORMIA COUNTY OF LOS ANGELES—WEST DISTRICT</li> <li>UNLIMITED JURISDICTION</li> <li>NATALE SEU, an individual; MARIA</li> <li>VITTORIA LODDO, an individual; ESTATE OF EMANUELE SEU, by and through its</li> <li>Administrator Matthew Yu;</li> <li>Plaintiffs,</li> <li>Plaintiffs,</li> <li>V.</li> <li>THE REGENTS OF THE UNTVERSITY OF CALFFORMA, a public existy; LAURA M. DESTRO, M.D., an individual; THOMAS P. GRAHAM, M.D., an individual; THOMAS OF GRAHAM, M.D., an individual; THOMAS OF GRAHAM, M.D., an individual; THOMAS D. GRAHAM, M.D., an individual; THOMAS AND, AND, AND, AND, AND, AND, AND, AND,</li></ul>	3	Hua Gallai, LLP	DEC 02 2013
<ul> <li>Facsimile: (480) 393-4433</li> <li>Attorneys for Plaintiffs Natale Seu, Maria Vittoria Loddo, Efisia Seu, and Estate of Emanuele Seu, by and through its Administrator Matthew Yu</li> <li>SUPERIOR COURT OF THE STATE OF CALLFORNIA COUNTY OF LOS ANGELES—WEST DISTRICT UNLIMITED JURISDICTION</li> <li>NATALE SEU, an individual; MARIA UTTORIA LODDO, an individual; EFISIA SEU, an individual; ESTATE OF EMANUELE SEU, by and through its Administrator Matthew Yu;</li> <li>Plaintiffs,</li> <li>V.</li> <li>THE REGENTS OF THE UNIVERSITY OF CALLFORNIA, a public entity; LAURA M. DESTRO, M.D., an individual; TESICA E ELLERMAN, M.D., an individual; SESICA E ELLERMAN, M.D., an individual; STEVEN J. ROTTMAN, M.D., an individual; TENEN D. FARN, M.D., an individual; TENID FARN, M.D., an individual; TENID FARN, M.D., an individual; RESICA E GOUP, an entity unknown; RAMEZA. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	4	Beverly Hills, CA 90210	Sherri R. Carter, Executive Officer/Clerk
Attorneys for Plaintiffs Natale Seu, Maria Vittoria Loddo, Efisia Seu, and Estate of Emanuele Seu, by and through its Administrator Matthew Yu SUPERIOR COURT OF THE STATE OF CALLFORMIA COUNTY OF LOS ANGELES—WEST DISTRICT UNLIMITED JURISDICTION NATALE SEU, an individual; MARIA VITTORIA LODDO, an individual; EFISIA SEU, an individual; STATE OF EMANUELE SEU, by and through its Administrator Matthew Yu; Superstrate of the UNIVERSITY OF CALLFORMIA, a public entito; LAURA M. DESTRO, M.D., an individual; TROMAS P. GRAHAM, M.D., an individual; ISSICA E BLLERMAN, M.D., an individual; BSSICA E BLLERMAN, M.D., an individual; RAISER FOUNDATION HEAT THE REGENTS OF THE UNIVERSITY OF CALLFORMIA, a public entito; LAURA M. DESTRO, M.D., an individual; RAISER FOUNDATION HEAT THE ALSER FOUNDATION HEAT THE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive; Defendants. Composition KAISER FOUNDATION HEAT THE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive; Defendants.	5	Facsimile: (480) 393-4433	ByN. VALLES
<ul> <li>Natale Seu, Maria Vittoria Loddo, Efisia Seu, and Estate of Emanuele Seu, by and through its</li> <li>Administrator Matthew Yu</li> <li>SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES—WEST DISTRICT UNLIMITED JURISDICTION</li> <li>NATALE SEU, an individual; MARIA VITTORIA LODDO, an individual;</li> <li>VITTORIA LODDO, an individual; ESTATE OF EMANUELE SEU, by and through its Administrator Matthew Yu;</li> <li>Plaintiffs,</li> <li>V.</li> <li>THE REGENTS OF THE UNTYERSITY OF CALIFORNIA, a public exitor; LAURA M DESTRO, M.D., an individual; THOMAS P. GRAHAM, M.D., an individual; MOL, an individual; STEVEN J. ROTTMAN, M.D., an individual; MAISER FOUNDATION HOSPITALS, a California corporation; SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	6	Attomatic for Dist d'm	N. Verten
9       SUPERIOR COURT OF THE STATE OF CALIFORNIA COUNTY OF LOS ANGELES—WEST DISTRICT UNLIMITED JURISDICTION         11       UNLIMITED JURISDICTION         12       NATALE SEU, an individual; MARIA VITTORIA LODDO, an individual; EFISIA SEU, an individual; ESTATE OF EMANUELE SEU, by and through its Administrator Matthew Yu;       Case No.       SC121725         14       EMANUELE SEU, by and through its Administrator Matthew Yu;       Case No.       SC121725         15       Plaintiffs,       ComPLaINT FOR DAMAGES AND OR RELIEF       ComPLaINT FOR DAMAGES AND OR RELIEF         16       v.       1.       MEDICAL MALPRACTICE       2.         17       THE REGENTS OF THE UNFVERSITY OF CALIFORNIA, a public sation, LAURA M. DESTRO, M.D., an individual; TESSICA E ELLERMAN, M.D., an individual; MARIA, M.D., an individual; RISER FOUNDATION HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION HEALTH PLAN, S. CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive;       CASE MANAGEMENT CONFERE M.L. COOPMAN Date         28       Defendants.       MOX M.J.	j	Natale Seu, Maria Vittoria Loddo, Efisia Se Estate of Emanuele Seu, by and through its	u, and
11       UNLIMITED JURISDICTION         12       NATALE SEU, an individual; MARIA         13       VITTORIA LODDO, an individual;         14       EFISIA SEU, an individual; ESTATE OF         15       MANUELE SEU, by and through its         16       V.         17       THE REGENTS OF THE UNIVERSITY         16       V.         17       THE REGENTS OF THE UNIVERSITY         18       OF CALIFORNIA, a public entity.         19       Individual; THOMAS P ORAHAM, M.D., an         10       individual; HOLLY R.         MIDDLEKAUFP, M.D., an individual;       STEVEN J. ROTTMAN, M.D., an         21       STEVEN J. ROTTMAN, M.D., an         22       individual; KAISER FOUNDATION         HEALTH PLAN, INC., a California corporation;       SOUTHERN CALIFORNIA         23       Conporation; KAISER FOUNDATION         HEAT TH PLAN, INC., a california corporation;       SOUTHERN CALIFORNIA         24       Defendants.         25       Defendants.			
11       UNLIMITED JURISDICTION         12       NATALE SEU, an individual; MARIA         13       VITTORIA LODDO, an individual; ESTATE OF         14       EFISIA SEU, an individual; ESTATE OF         15       Plaintiffs,         16       V.         17       Plaintiffs,         18       OF CALIFORNIA, a public entry:         19       Individual; THOMAS P GRAHAM, M.D., an         19       individual; THOMAS P GRAHAM, M.D., an         19       individual; THOMAS P GRAHAM, M.D., an         11       MDDLEKAUFF, M.D., an individual;         12       STEVEN J. ROTIMAN, M.D., an         13       corporation; KAISER FOUNDATION         14       HEALTR PLAN, INC., a California         20       corporation; KAISER FOUNDATION         12       BETHINASIOS, M.D., an individual;         21       SUTHERN CALIFORNIA         22       Defendants.	10	SUPERIOR COURT OF	THE STATE OF CALIFORNIA
<ul> <li>NATALE SEU, an individual; MARIA VITTORIA LODDO, an individual; ESTATE OF EMANUELE SEU, by and through its Administrator Matthew Yu;</li> <li>Plaintiffs,</li> <li>Plaintiffs,</li> <li>V.</li> <li>THE REGENTS OF THE UNPVERSITY OF CALIFORNIA, a public entity; LAURA M. DESTRO, M.D., an individual; JESSICA E. ELLERMAN, M.D., an individual; MOLLY R. MIDDLEKAUFF, M.D., an individual; STEVEN J. ROTTMAN, M.D., an individual; HEIKI D. FARIN, M.D., an individual; MAISER FOUNDATION HOSPITALS, a California corporation; SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	11		
<ul> <li>VITTORIA LODDO, an individual; EFISIA SEU, an individual; ESTATE OF EMANUELE SEU, by and through its Administrator Matthew Yu;</li> <li>Plaintiffs,</li> <li>V.</li> <li>Plaintiffs,</li> <li>V.</li> <li>THE REGENTS OF THE UNPVERSITY OF CALIFORNIA, a public entity; LAURA M. DESTRO, M.D., an individual; THOMAS P. GRAHAM, M.D., an individual; THOMAS P. GRAHAM, M.D., an individual; THOMAS P. GRAHAM, M.D., an individual; TESSICA E. ELLERMAN, M.D., an individual; STEVEN J. ROTTMAN, M.D., an individual; AESICA E. ELLERMAN, M.D., a individual; STEVEN J. ROTTMAN, M.D., an individual; AESIER FOUNDATION HEALTR PLAN, INC., a California corporation; KAISER FOUNDATION HEALTR PLAN, INC., a individual; and DOES 1-50, inclusive; Defendants.</li> </ul>	12		$\sim (2/1)^{\vee}$
<ul> <li>EPISIA SEU, an individual; ESTATE OF EMANUELE SEU, by and through its Administrator Matthew Yu;</li> <li>Plaintiffs,</li> <li>Plaintiffs,</li> <li>Plaintiffs,</li> <li>v.</li> <li>THE REGENTS OF THE UNIVERSITY OF CALIFORNIA, a public entity; LAURA M. DESTRO, M.D., an individual; THOMAS P. GRAHAM, M.D., an individual; DESSICA E. ELLERMAN, M.D., an individual; BSSICA E. ELLERMAN, M.D., an individual; ND, an individual; KAISER FOUNDATION HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION HOSPITALS, a California corporation; SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHINASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	13	NATALE SEU, an individual; MARIA VITTORIA LODDO, an individual:	Case No. 2 SU121725
<ul> <li>Administrator Matthew Yu;</li> <li>Plaintiffs,</li> <li>Plaintiffs,</li> <li>Plaintiffs,</li> <li>N.</li> <li>THE REGENTS OF THE UNPUBSITY</li> <li>OF CALIFORNIA, a public entity;</li> <li>LAURA M. DESTRO, M.D., an</li> <li>individual; THOMAS P. GRAHAM, M.D.,</li> <li>an individual; DESICA E. ELLERMAN,</li> <li>MDDLEKAUFF, M.D., an individual;</li> <li>STEVEN J. ROTTMAN, M.D., an</li> <li>individual; MEIKI D. FARIN, M.D., an</li> <li>individual; MEIKI D. FARIN, M.D., an</li> <li>individual; MAISER FOUNDATION</li> <li>HEALTH PLAN, INC., a California</li> <li>corporation; KAISER FOUNDATION</li> <li>HOSPITALS, a California corporation;</li> <li>SOUTHERN CALIFORNIA</li> <li>PERMANENTE MEDICAL GROUP, an</li> <li>entity unknown; RAMEZ A.</li> <li>ETHINASIOS, M.D., an individual;</li> <li>and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	14	EFISIA SEU, an individual; ESTATE OF EMANUELE SEU, by and through its	COMPLAINT FOR DAMAGES AND OTHER
<ul> <li>Plaintiffs,</li> <li>Plaintiffs,</li> <li>V.</li> <li>THE REGENTS OF THE UNIVERSITY</li> <li>OF CALIFORNIA, a public entry;</li> <li>LAURA M. DESTRO, M.D., an</li> <li>individual; THOMAS P. GRAHAM, M.D.,</li> <li>an individual; DESSICA E. ELLERMAN,</li> <li>M.D., an individual; BESICA E. ELLERMAN,</li> <li>M.D., an individual; HOLL Y R.</li> <li>MIDDLEKAUFF, M.D., an individual;</li> <li>STEVEN J. ROTEMAN, M.D., an</li> <li>individual; ABER FOUNDATION</li> <li>HEALTH PLAN, INC., a California</li> <li>corporation; KAISER FOUNDATION</li> <li>HEALTH PLAN, INC., a California</li> <li>corporation; KAISER FOUNDATION</li> <li>HOSPITALS, a California corporation;</li> <li>SOUTHERN CALIFORNIA</li> <li>PERMANENTE MEDICAL GROUP, an</li> <li>entity unknown; RAMEZ A.</li> <li>ETHINASIOS, M.D., an individual;</li> <li>and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	15	Administrator Matthew Yu;	
<ul> <li>THE REGENTS OF THE UNIVERSITY</li> <li>OF CALIFORNIA, a public entity; LAURA M. DESTRO, M.D., an</li> <li>individual; THOMAS P. GRAHAM, M.D., an individual; JESSICA E. ELLERMAN, M.D., an individual; HOLLY R. MIDDLEKAUFF, M.D., an individual;</li> <li>STEVEN J. ROTTMAN, M.D., an</li> <li>individual; HEIKI D. FARIN, M.D., an</li> <li>individual; HEIKI D. FARIN, M.D., an</li> <li>individual; KAISER FOUNDATION HEAL TH PLAN, INC., a California corporation; KAISER FOUNDATION HOSPITALS, a California corporation; SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an</li> <li>entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	16	Plaintiffs,	2. WRONGFUL DEATH
<ul> <li>OF CALIFORNIA, a public entry; LAURA M. DESTRO, M.D., an</li> <li>individual; THOMAS P. GRAHAM, M.D., an individual; JESSICA E. ELLERMAN, M.D., an individual; HOLLY R. MIDDLEKAUFF, M.D., an individual;</li> <li>STEVEN J. ROTTMAN, M.D., an individual; HEIKI D. FARIN, M.D., an individual; HEIKI D. FARIN, M.D., an</li> <li>streven J. ROTTMAN, M.D., an individual; HEIKI D. FARIN, M.D., an</li> <li>corporation; KAISER FOUNDATION HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION HOSPITALS, a California corporation; SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	17	<b>v.</b>	DEMAND FOR JURY TRIAL
<ul> <li>LAURA M. DESTRO, M.D., an</li> <li>individual; THOMAS P. GRAHAM, M.D., an individual; JESSICA E. ELLERMAN,</li> <li>M.D., an individual; NOLLY R. MIDDLEKAUPP, M.D., an individual;</li> <li>STEVEN J. ROTTMAN, M.D., an</li> <li>individual; NEIKI D. FARIN, M.D., an</li> <li>individual; KAISER FOUNDATION</li> <li>HEAL TR PLAN, INC., a California corporation; KAISER FOUNDATION</li> <li>HOSPITALS, a California corporation;</li> <li>SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an</li> <li>entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	18	OF CALIFORNIA, a public entity	
<ul> <li>an individual; JESSICA E, ELLERMAN, M.D., an individual; HOLLY R. MIDDLEKAUFF, M.D., an individual; STEVEN J. ROTTMAN, M.D., an individual; HEKI D. FARIN, M.D., an individual; HEKI D. FARIN, M.D., an individual; HEKI D. FARIN, M.D., an individual; KAISER FOUNDATION HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION HOSPITALS, a California corporation; SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHINASIOS, M.D., an individual; RUBENS J. SONG, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	19	LAURA M. DESTRO, M.D., an individual: THOMAS P. GRAHAM M.D.	
<ul> <li>STEVEN J. ROTTMAN, M.D., an individual; HEIKI D. FARIN, M.D., an individual; KAISER FOUNDATION HEALTH PLAN, INC., a California corporation; SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHINASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	20	an individual; JESSICA E, ELLERMAN, M.D., an individual, NOLLY R.	τ
<ul> <li>individual; MEIKI D. FARIN, M.D., an</li> <li>individual; MEIKI D. FARIN, M.D., an</li> <li>individual; KAISER FOUNDATION</li> <li>HEAL TH PLAN, INC., a California</li> <li>corporation; KAISER FOUNDATION</li> <li>HOSPITALS, a California corporation;</li> <li>SOUTHERN CALIFORNIA</li> <li>PERMANENTE MEDICAL GROUP, an</li> <li>entity unknown; RAMEZ A.</li> <li>ETHINASIOS, M.D., an individual;</li> <li>and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	21	MIDDLEKAUFF, M.D., an individual; STEVEN J. ROTFMAN, M.D., an	
<ul> <li>HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION HOSPITALS, a California corporation; SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; RUBENS J. SONG, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	22	individual; (HEIKI D. FARIN, M.D., an individual; KAISER FOUNDATION	CASE MANAGEMENT CONFERENCE
<ul> <li>SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; and DOES 1-50, inclusive;</li> <li>Defendants.</li> </ul>	23	HEALTH PLAN, INC., a California	ALLAN L COODMAN SITIL
<ul> <li>25 entity unknown; RAMEZ A. ETHINASIOS, M.D., an individual;</li> <li>26 RUBENS J. SONG, M.D., an individual; and DOES 1-50, inclusive;</li> <li>27 Defendants.</li> </ul>	24	SOUTHERN CALIFORNIA	Dept P Date 830m
26       RUBENS J. SONG, M.D., an individual; and DOES 1-50, inclusive;         27       Defendants.         28	25	entity unknown; RAMEZ A.	- 1
27 28 Defendants.	26	RUBENS J. SONG, M.D., an individual:	$r$ $\gamma \nu$ $r$
	27	and DOES 1-50, inclusive;	(1057 4000)
	28	Defendants.	i kapon
	- <b>-</b>		
COMPLAINT FOR DAMAGES AND OTHE			COMPLAINT FOR DAMAGES AND OTHER RELIEF

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1	Plaintiffs NATALE SEU, an individual; MARIA VITTORIA LODDO, an individual;
2	EFISIA SEU, an individual; and ESTATE OF EMANUELE SEU, by and through its
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4	
5	CALIFORNIA, a public entity ("the Regents"); LAURA M. DESTRO, M.D., an individual;
6	THOMAS P. GRAHAM, M.D., an individual; JESSICA E. ELLERMAN, M.D., an individual;
7	HOLLY R. MIDDLEKAUFF, M.D., an individual; STEVEN J. ROTTMAN, M.D., an
8	individual; HEIDI D. FARIN, M.D., an individual (collectively, "UCLA Doctors"); KAISER
9	FOUNDATION HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION
10	HOSPITALS, a California corporation and its related entity, SOUTHERN CALIFORNIA
11	PERMANENTE MEDICAL GROUP (collectively "Kaiser Hospital"); RAMEZ A.
12	ETHNASIOS, M.D., an individual; RUBENS J. SONG, M.D., an individual (collectively "Kaiser
13	Doctors"); and DOES 1-50, inclusive (collectively the named Defendants and DOES 1-50 are
14	referred to herein as "Defendants"), and alleges thereon:
15	THE PARTIES
16	1. Plaintiff NATALE SEU is an individual who, at all relevant times hereto, resides
17	in the Republic of Italy and is the father and heir of the decedent Emanuele Seu.
18	2. Plaintiff MARIA VITTORIA LODDO is an individual who, at all relevant times
19	hereto, resides in the Republic of Italy and is the mother and heir of the decedent Emanuele Seu.
20	3. Plaintif EFISIA SEU is an individual who, at all relevant times hereto, resides in
21	the Republic of Italy and is the sister and heir of the decedent Emanuele Seu. Plaintiffs Natale
22	Seu, Maria Vittoria Loddo, and Efisia Seu are the sole lawful heirs of the Decedent by intestate
23	succession and are entitled to assert cause of action for wrongful death in their own name
24	pursuant to California Code of Civil Procedure section 377.60.
25	4. Plaintiff THE ESTATE OF EMANUELE SEU, is the estate of the Decedent
26	Emanuele Seu and represents the Decedent Emanuele Seu, which estate is acting by and though
27	its administrator Matthew C. Yu, appointed by order of the Superior Court of California for the
28	County of Los Angeles and does not represent in this litigation the other Plaintiffs Natale Seu, -2-
	COMPLAINT FOR DAMAGES AND OTHER RELIEF





Maria Vittoria Loddo and Efisia Seu, which are asserting Wrongful Death causes of action in
their own right. At all relevant times, Matthew Yu resides in the County of Los Angeles. The
Decedent Emanuele Seu (herein "Decedent") was an individual who at all relevant times resided
in the City of Los Angeles, County of Los Angeles and who died on or about December 16, 2012
in the City of Los Angeles as a result of the professional negligence and carelessness of the
Defendants as alleged herein. Decedent Seu died intestate at the age of 34, unmarried and
without any surviving children or grandchildren and without any other issue.

8 5. Plaintiffs are informed and believe that, at all relevant times, Defendant THE 9 REGENTS OF THE UNIVERSITY OF CALIFORNIA ("Regents"), is a public entity who, inter alia, operates hospitals and clinics within the County of Los Angeles, including but not limited to, 10 the UCLA Emergency Medical Center at the UCLA Medical Hospital (the "UCLA ER"), at 11 12 which the Decedent was a patient as alleged herein. The Regents which operates UCLA ER also employs Defendants, UCLA Doctors, Dr. Laura Destro, Dr. Thomas P. Graham, Dr. Jessica E. 13 14 Ellerman, Dr. Holly R. Middlekauff, Dr. Steven J. Rottman, and Dr. Heidi K. Farin, who were 15 acting within the course and scope of their employment for the Regents and UCLA ER when they caused the wrongful death of Decedent through their conduct. 16

Plaintiffs are informed and believe that, at all relevant times, Defendant LAURA
 M. DESTRO, M.D. ("Destro") is a medical doctor and physician licensed by the State of
 California who was employed as a physician by the Regents, including but not limited to, at the
 UCLA ER, and that Decedent was a patient of Destro as alleged herein.

7. Plaintiffs are informed and believe that, at all relevant times, Defendant THOMAS
 P. GRAHAM, M.D. ("Graham") is a medical doctor and physician licensed by the State of
 California who was employed as a physician by the Regents, including, but not limited to, at the
 UCLA ER, and that Decedent was a patient of Graham as alleged herein.

8. Plaintiffs are informed and believe that, at all relevant times, Defendant JESSICA
 E. ELLERMAN, M.D. ("Ellerman") is a medical doctor and physician licensed by the State of
 California who was employed as a physician by the Regents, including, but not limited to, at the
 UCLA ER, and that Decedent was a patient of Ellerman as alleged herein.

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1 9. Plaintiffs are informed and believe that, at all relevant times, Defendant HOLLY 2 R. MIDDLEKAUFF, M.D. ("Middlekauff") is a medical doctor and physician licensed by the 3 State of California who was employed as a physician by the Regents, including, but not limited to, at the UCLA ER, and that Decedent was a patient of Middlekauff as alleged herein. 4 5 Plaintiffs are informed and believe that, at all relevant times, Defendant STEVEN 10. 6 J. ROTTMAN, M.D. ("Rottman") is a medical doctor and physician licensed by the State of 7 California who was employed as a physician by the Regents, including, but not limited to, at the UCLA ER, and that Decedent was a patient of ROTTMAN as alleged herein 8 9 Plaintiffs are informed and believe that, at all relevant times, Defendant HEIKI. 11. 10 FARIN, M.D. ("Farin") is a medical doctor and physician licensed by the State of California who 11 was employed as a physician by the Regents, including, but not limited to, at the UCLA ER, and 12 that Decedent was a patient of Farin as alleged herein. 13 Plaintiffs are informed and believe that, at all relevant times, Defendant KAISER 12. FOUNDATION HEALTH PLAN, INC. ("Kaiset Foundation"), is a California corporation 14 headquartered in California who, inter alia, operates hospitals and clinics within the County of 15 Los Angeles, including, but not limited to, the Kaiser Permanente Medical Center in West Los 16 Angeles (the "Kaiser Hospital"), at which the Decedent was a patient as alleged herein. 17 Plaintiffs are informed and believe that, at all relevant times, Defendant KAISER 18 13. FOUNDATION HOSPITALS ("Kaiser Foundation"), is a California corporation headquartered 19 in California who, inter alia, operates hospitals and clinics within the County of Los Angeles, 20 including, but not limited to, the Kaiser Permanente Medical Center in West Los Angeles (the 21 22 "Kaiser Hospital"), at which the Decedent was a patient as alleged herein. 23 14 Plaintiffs are informed and believe that, at all relevant times, Defendant 24 SOUTHERN CALIFORNIA PERMANENTE MEDICAL GROUP ("Kaiser Medical Group") is 25 an entity unknown headquartered in southern California which, inter alia, operates hospitals and clinics within the County of Los Angeles, including, but not limited to, the Kaiser Permanente 26 27 Medical Center in West Los Angeles (the "Kaiser Hospital"), at which the Decedent was a patient 28 as alleged herein. COMPLAINT FOR DAMAGES AND OTHER RELIEF

1 15. Defendants Kaiser Foundation, Kaiser Hospitals and Kaiser Medical Group are 2 collectively referred to herein as "Kaiser Permanente." 3 Plaintiffs are informed and believe that, at all relevant times, Defendant RAMEZ 16. A. ETHNASIOS, M.D. ("Ethnasios") is a medical doctor and physician licensed by the State of 4 California who was employed as a physician by Kaiser Permanente, including, but not limited to, 5 at the Kaiser Hospital, and that Decedent was a patient of Ethnasios as alleged herein. 6 7 Plaintiffs are informed and believe that, at all relevant times, Defendant RUBENS 17. 8 J. SONG, M.D. ("Song") is a medical doctor and physician licensed by the State of California who was employed as a physician by Kaiser Permanente, including, but not limited to, at the 9 Kaiser Hospital, and that Decedent was a patient of Song as alleged herein. 10 Defendants are subject to personal jurisdiction in California and venue is proper. 11 18. 12 19. Plaintiff does not know the true names and capacities of defendants DOES 1 through 50, inclusive, and therefore sues them by said fictitious names. Plaintiff will amend this 13 complaint to allege their true names and capacities when ascertained. Plaintiffs are informed and 14 believe that each of the defendants sued herein as a DOE defendant is also legally responsible for 15 16 the events that gave rise to Plaintiff's causes of action against Defendants and each of them, and also unlawfully caused injuries and damages to Plaintiff as alleged in this Complaint. 17 Plaintiffs are informed and believe, and thereon alleges that each defendant was in 18 20. some way responsible for Plaintiff's injuries and damages alleged herein, that each defendant 19 20 contributed to and participated in acts alleged herein and that, in contributing to and participating 21 in such conduct, each defendant was the agent of each other and was acting in the course and scope of such agency and employment, respondeat superior of their respective employers and/or 22 each defendant acted with permission, consent, ratification, authorization or notification of the 23 24 other defendants. 25 21. Before filing this Complaint, statutory notice has been provided pursuant to 26 California Code of Civil Procedure section 364-365. Pursuant to California Code of Civil 27 Procedure 905.6, although the Regents are a public entity, claims against the Regents are exempt 28 from compliance with the Tort Claims Act. -5-

COMPLAINT FOR DAMAGES AND OTHER RELIEF

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## **COMMON ALLEGATIONS**

22. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth herein.

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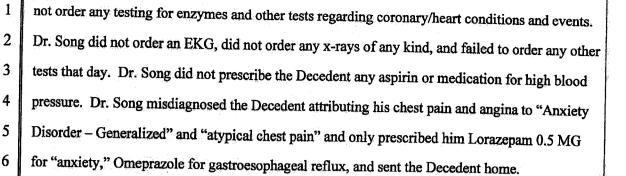
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4 On Tuesday, December 4, 2012 at or about 1:23 a.m. in the middle of the night, 23. the Decedent arrived at the UCLA E.R., complaining of chest pain on a scale of 8 out of 10. The 5 Decedent described the pain as chest pressure as well as pain radiating from the chest to the arms 6 and neck. The Decedent informed that he was a tobacco user and smoker. At arrival at 1:23 a.m., 7 the Decedent had high blood pressure of 150/97. At or about 1:33 p.m., an EKG was performed 8 which showed abnormal results, including, but not necessarily limited to, an Incomplete right 9 bundle branch block." Defendant Farin reviewed the EKG results at about 1:40 a.m. and the 10 results of the EKG were accordingly reported in the Decedent's chart as "Abnormal LVCD." 11 Drs. Destro and Graham visited the Decedent respectively at about 1:39 a.m., 2:15 a.m., and at 12 13 2:40 a.m.

Despite the abnormal EKG results showing "abnormal LVCD," the Decedent's 14 24. smoking history, his high blood pressure, radiating chest pain and angina, Drs. Destro, Farin, and 15 16 Graham did not order any blood tests of any kind whatsoever, did not order any x-rays, did not order any other tests of any kind, did not keep Decedent at the ER for observation, and did not 17 prescribe him any medication of any kind. Instead, they misdiagnosed the Decedent, reported in 18 his chart that he had "atypical chest pain," and discharged him at 3:39 a.m., just barely two hours 19 20 after he had arrived, with the mere instruction to follow up with his primary care physician at 21 Kaiser Permanente within two days. Then, at 3:59 p.m. on December 4, 2013, about 12 hours 22 after the Decedent had been discharged, Defendant Middlekauff did read the EKG and reported it "within normal limits" even though it was not, it showed "abnormal LVCD," and Middlekauff 23 also did not administer proper care to the Decedent, which could have saved his life. 24 25 25. On December 6, 2012 at about 4:10 p.m., following the December 4, 2012 advice 26 from UCLA E.R. to follow up with his primary care doctor, the Decedent visited Dr. Song at 27 Kaiser Hospital concerning his ongoing chest pain and symptoms of angina. Dr. Song only ordered some generic blood tests for creatinine, ALT, lipid panel, TSH, and hemoglobin, but did 28 -6-





7 On December 10, 2012 at about 1:30 p.m., the Decedent visited Dr. Ethnasios at 26. Kaiser Hospital. At that time, including at the previous times that the Decedent had sought 8 medical help since December 4, 2012, the Decedent was barely able to eat and sleep due to the 9 chest pain and angina, could not lay flat and would spend most of the days sitting at home on a 10 chair or on the couch due to the chest pain. On that day, even though Dr. Ethnasios diagnosed the 11 Decedent with "Left Ventricular Hypertrophy" and he suffered from severe chest pain and 12 angina, Dr. Ethnasios misdiagnosed him with "Chest Pain – Atypical" and did not order any 13 blood tests, did not order any x-rays, did not keep the Decedent at the Kaiser Hospital for 14 observation, and did not prescribe him any medication of any kind, as well as also informing him 15 that his cardiac work-up was normal even though it was not, he had left ventricular hypertrophy, 16 17 and no adequate work-up under the provincumstances had been performed. Again, Dr. Ethanasios Decedent sent home without any proper care. 18

19 27. On December 13, 2012, at about 12:10 p.m., the Decedent summoned a friend to take him to the UCLAE.R. again. At the UCLA E.R., as evidenced in the medical records, the 20 Decedent stated that he had chest pain for 10 days, that he had been seen at UCLA E.R. on 21 December 4, 2012, that he had been prescribed Omeprazole by his primary doctor and that "Pt 22 Decedent reports pain persists, worse at night and with eating." At arrival, the Decedent had 23 high blood pressure of 143/100, complaining of chest pain reaching 9 out of 10, but oscillating. 24 25 Dr. Ellerman visited Decedent at 12:17 p.m. and then by Rottman at 1:38 p.m. and 1:48 p.m. 26 Despite the Decedent's continuing chest pain, high blood pressure, angina, previous visit at the 27 UCLA E.R. with abnormal EKG showing "abnormal LVCD," the Decedent's unstable condition and all the circumstances which would have required proper care, Drs. Ellerman and Rottman did 28 -7-



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1	nothing. They did not perform any tests whatsoever, did not even perform an EKG, did not
. 2	perform any blood tests whatsoever, did not perform any x-rays, did not prescribe any
. 3	medication, and did not keep him under observation. Instead, they just sent him home at or about
4,	2:09 p.m. stating that he had been evaluated for "epigastric" pain and with the instruction to keep
5	taking Omeprazole and that "[y]our medications will take a while to work so please continue
6	taking them and expect improvement in about 2 weeks."
7	28. On December 16, 2012, at about 2:15-2:20 p.m., a friend of Decedent found
8	Decedent in his apartment in Los Angeles, California. Decendent's friend called 911. The
9	paramedics arrived and declared Decedent Emanuele Seu dead at about 2 23 p.m. on December
10	16, 2012.
11	29. On or about December 18, 2012, the Los Angeles County Coroner performed an
12	autopsy of Decedent which determined the death to be due to "coronary artery disease" with
13	contributing condition of "cardiomegaly" with evidence of "chronic ischemic changes or remote
14	infarction." The Coroner Autopsy Report states as follows:
15	"1. Coronary Artery Disease:
16	a. Left anterior descending branch: proximal segmental 70-80% occlusion.
17	b. Left circumflex branch: proximal segmental 80% occlusion.
18	c. Right coronary artery: proximal 30% occlusion.
19	d. Fibrosis of left ventricle free wall with endocardial sparing, consistent with
20	chronic ischemic changes or remote infarction.
21	2. Cardiomegaly, 510 grams (normal reference range: 262-455 grams)
22	i. Borderline left ventricular hypertrophy: 1-4-1.6 cm thick."
23	FIRST CAUSE OF ACTION FOR MEDICAL MALPRACTICE
24	By Estate of Emanuele Seu, by and through its Administrator Matthew Yu Against all
25	Defendants: Does 1-50)
26	30. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this
27	Complaint as though fully set forth herein.
28	-8- COMPLAINT FOR DAMAGES AND OTHER RELIEF



31. Defendants, in their capacity as health care providers and professionals, owed
 duties of care to the Decedent, including, but not limited to, a duty to use such skill, prudence,
 and diligence in care and diagnosis as other reasonably careful members of their profession would
 use in the same or similar circumstances. Defendants also owed the duty to monitor Decedent's
 condition and to exercise such reasonable care toward Decedent who was their patient.

32. Defendants breached their duties of care to Decedent as alleged herein, including,
but not limited to, by misdiagnosing Decedent, by failing to diagnose him with coronary artery
disease, cardiomegaly, and heart disease; by failing to perform the tests, exams and procedures
which would have led to the right diagnosis and to the avoidance of Decedent's death; by failing
to take the necessary actions to avoid his death.

11 33. As a proximate and legal cause of Defendants' conduct, carelessness, and breaches 12 of their duties of care, Decedent suffered death, which would not have occurred but for 13 Defendants' negligence and breaches of the duties of care and for which Defendants are jointly 14 and severally liable. Defendants' wrongful acts and neglect were the proximate cause of 15 Decedent's death. In addition, Decedent and his estate have suffered other injuries and general 16 and special damages according to proof at trial, including also lost income, as a result of 17 Defendants' negligence.

SECOND CAUSE OF ACTION FOR WRONGFUL DEATH

## (By Plaintiffs Natale Seu, Maria Vittoria Loddo, Efisia Seu

Against all Defendants; Does 1-50)

34. Plaintiffs re-allege and incorporate by reference all prior paragraphs of this Complaint as though fully set forth herein.

As a proximate and legal cause of Defendants' conduct, carelessness, and breaches
of their duties of care, Decedent suffered death, which would not have occurred but for
Defendants' negligence and breaches of the duties of care and for which Defendants are jointly
and severally liable. Defendants' wrongful acts and neglect were the proximate cause of death of
Decedent.

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36. As the direct and proximate cause of the foregoing and of the death of the Decedent, Plaintiffs Natale Seu, Maria Vittoria Loddo and Efisia Seu have been deprived of their kind and loving son and brother, Decedent Emanuele Seu, of his care, comfort, society, protection, love, companionship, affection, solace, moral support, assistance, and financial support.

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37. As a further direct and proximate cause of Defendants' wrongful acts and neglect, Plaintiffs have been generally and specially damaged in a sum to be established according to proof at trial, which damages and injuries would not have occurred but for Defendants' actions and breaches resulting in Decedent's death.

38. As a further direct and proximate result of the death of the Decedent, Plaintiffs
have incurred reasonable and necessary expenses caused by Defendants' negligence and by the
death of Decedent, including expenses for storage of Decedent's body, transfer of Decedent's
body to the Republic of Italy, funeral, burial, memorial services and related expenses and costs
caused by the death of Decedent, in excess of \$25,000.00.

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## PRAYER FOR RELIEF

16 WHEREFORE, Plaintiffs NATALE SEU, an individual; MARIA VITTORIA LODDO. 17 an individual; EFISIA SEU, an individual; and ESTATE OF EMANUELE SEU, by and through 18 its Administrator Matthew Yu (Plaintiffs") pray for judgment against Defendants THE 19 REGENTS OF THE UNIVERSITY OF CALIFORNIA, a public entity; LAURA M. DESTRO, 20 M.D., an individual, THOMAS P. GRAHAM, M.D., an individual; JESSICA E. ELLERMAN, 21 M.D., an individual; HOLLY R. MIDDLEKAUFF, M.D., an individual; STEVEN J. 22 ROTTMAN, M.D., an individual; HEIKI D. FARIN, M.D., an individual; KAISER 23 FOUNDATION HEALTH PLAN, INC., a California corporation; KAISER FOUNDATION 24 HOSPITALS, a California corporation; SOUTHERN CALIFORNIA PERMANENTE 25 MEDICAL GROUP, an entity unknown; RAMEZ A. ETHNASIOS, M.D., an individual; 26 RUBENS J. SONG, M.D., an individual; and DOES 1-50, inclusive, and each of them as follows: 27 1. For general damages in an amount to be determined according to proof at trial: 28 2. For special damages in an amount to be determined according to proof at trial -10-

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1	3. For all damages caused by Defendants' deprivation of the Decedent's care, comfort,
2	society, protection, love, companionship, affection, solace, moral support, assistance,
3	and financial support;
4	4. For reasonable and necessary expenses caused by Defendants' negligence and by the
5	4. For reasonable and necessary expenses caused by Derendants' negligence and by the death of Decedent, including expenses for storage of Decedent's body, transfer of
6	
7	Decedent's body to the Republic of Italy, funeral, burial, memorial services and
/ 8:	related expenses and costs caused by the death of Decedent, in excess of \$25,000.00;
• • • • • •	5. For all other damages and expenses recoverable pursuant to California Code of Civil Proceedure section 277.60 net encoded above to the function of the sector.
10	Procedure section 377.60 not specifically requested above, to the fullest extent permitted by law;
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	6. For prejudgment interest;
12 12	7. For recovery of attorneys' fees and costs to the fullest extent permitted by law;
13 14	8. For such other and further relief as this Court deems just and proper.
	DEMAND FOR JURY TRIAL
15	Plaintiffs hereby demand a jury trial on all issues and claims regarding this Complaint.
16 17	
17	DATED: December, 2013 HUA GALLAI, LLP.
18	By: Gracamo Gallai
19	Nicholas T. Hua Giacomo Gallai
20	Attorneys for Plaintiffs Natale Seu, Maria
21 22	Vittoria Loddo, Efisia Seu, Estate of Emanuele Seu, by and through its
22	Administrator Matthew Yu
24 25	
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	COMPLAINT FOR DAMAGES AND OTHER RELIEF
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