ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): AARON SANDOVAL	FOR COURT USE ONLY
2061 RIESLING WAY	
PLACERVILLE, CALIFORNIA 95667-8874	
TENTOER TEED, OIL MIT STOOT OOT	
TELEPHONE NO: 530,957,4407 FAX NO. (Optional):	TO DUDCHIO OF
E-MAIL ADDRESS (Optional):	DORADO CO. SUPERIOR CT.
ATTORNEY FOR (Name): DTO SE	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF EL DORADO	FD 144V 1 4 201E
STREET ADDRESS: 3321 CAMERON PARK DRIVE	ED MAY 1 4 2015
MAILING ADDRESS: 3321 CAMERON PARK DRIVE	Cen
CITY AND ZIP CODE: CAMERON PARK, 95682	
BRANCH NAME: CAMERON PARK SUPERIOR COURT CIVIL DIV.	O Deputy
PLAINTIFF: AARON SANDOVAL	
The most of the board of the	
DEFENDANT: KAISER PERMANENTE NORTHERN CALIFORNIA	
(KPNC)	
DOES 1 TO 20	
COMPLAINT—Personal Injury, Property Damage, Wrongful Death	
AMENDED (Number): (4) Negligence, Libel, Emotional Distress	(S) *
Type (check all that apply):	Assigned to
MOTOR VEHICLE OTHER (specify): False light	Judge Warren C. Stracener
Property Damage Wrongful Death	For all purposes
Personal Injury Other Damages (specify): Exemplary	1 of all parpooce
Jurisdiction (check all that apply):	CASE NUMBER:
ACTION IS A LIMITED CIVIL CASE	
Amount demanded does not exceed \$10,000	PC 20150240
exceeds \$10,000, but does not exceed \$25,000	20130240
ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000) ACTION IS RECLASSIFIED by this amended complaint	
from limited to unlimited	
from unlimited to diffinited	
1. Plaintiff (name or names): AARON SANDOVAL	
alleges causes of action against defendant (name or names):	
KAISER PERMANENTE NORTHERN CALIFORNIA, DOES 1-20	
2. This pleading, including attachments and exhibits, consists of the following number of page	es:
3. Each plaintiff named above is a competent adult	
 a. except plaintiff (name). (1) a corporation qualified to do business in California 	
(1) a corporation qualified to do business in California (2) an unincorporated entity (describe):	
(3) a public entity (describe):	
(4) amnor an adult	
(a) for whom a guardian or conservator of the estate or a guard	ian 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 guard	ian ad litem has been appointed
(b) other (specify):	
(5) other (specify):	
Information about additional all-intifferent and a second a second and	
Information about additional plaintiffs who are not competent adults is shown in Atta	chment 3. Page 1 of 3

	SUODI TITI C.	1 221100
	SHORT TITLE: AARON SANDOVAL v. AISER PERMANENTE NORTHERN CA	CASE NUMBER:
4.	Plaintiff (name):	
	is doing business under the fictitious name (specify).	
5.	and has complied with the fictitious business name laws. Each defendant named above is a natural person	
	(2) a corporation (2) a col	dant (name): siness organization, form unknown rporation inincorporated entity (describe):
	(4) a public entity (describe):	blic entity (describe):
	(5) other (specify): (5) other	r (specify).
	b. except defendant (name): (1) a business organization, form unknown (1) a business organization a business organization.	ant (name): siness organization, form unknown
		rporation nincorporated entity (describe):
	(4) a public entity (describe):	blic entity (describe):
	(5) other (specify): (5) other	(specify):
6.	Information about additional defendants who are not natural persons is contained in The true names of defendants sued as Does are unknown to plaintiff. a. Doe defendants (specify Doe names s) 1-10 were	n Attachment 5. the agents or employees of other
	named defendants and acted within the scope of that agency or employment.	
7.	plaintiff. Defendants who are joined under Code of Civil Procedure section 382 are (names,	ersons whose capacities are unknown to
•	Determants who are joined under code of civil Procedure section 362 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 as c. injury to person or damage to personal property occurred in its jurisdictional are 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): CCP: 364-365 (EX-A)	

a.	SHORT TITLE:	CASE NUMBER:
causes of action atteched): a.	AARON SANDOVAL v. AISER PERMANENTE NORTHERN CA	
a. Motor Vehicle b. Ceneral Negligence c. Intentional Tort d. Products Lability f. Dither (specify): PINEGUIGENCE, LIBEL, NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS, FALSE LIGHT 11. Plaintiff has suffered a. wage loss b. loss of use of property c. Phospital and medical expenses d. general damage e. property damage f. loss of earning capacity g. other damage (specify): EXEMPLARY, AND ACCORDING TO PROOF AUTRIAL 12. The damages claimed for wrongful death and the relationships of plaintiff to the deceased are a. listed in Attachment 12. b. as follows: 13. The relief sought in this complaint is within the jurisdiction of this court. 14. Plaintiff pray for keigment for costs of suit, for such relief as is fair, just, and equitable; and for a. (1) wongensatory damages (2) purified damages (2) congenies as (in cases for personal injury or wrongful death, you must check (1)): (1) congenies as (in cases for personal injury or wrongful death, you must check (1)): (2) in the amount of \$\$ EX-A, EX-2 Date: MAY 14, 2015 AARON SANDOVAL		(each complaint must have one or more
b.		
c.	a. Motor Vehicle	
d. Products Liability e. Products Liability f. Other (specify): PI NEGLIGENCE, LIBEL, NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS, FALSE LIGHT 11. Plaintiff has suffered a. wage loss b. loss of use of property c. whospital and medical expenses d. general damage e. property damage f. loss of earning capacity g. other damage (specify): EXEMPLARY, AND ACCORDING TO PROOF ATTRIAL 12. The damages claimed for wrongful death and the relationships of plaintiff to the deceased are a. listed in Attachment 12. b. as follows: 13. The relief sought in this combility is within the jurisdiction of this court. 14. Plaintiff pray for judgment for costs of suit; for such relief as is fair, just, and equitable; and for a. (1) complehastory damages (2) purified 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. \$ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers): EX-A, EX-2 Date: MAY 14, 2015 AARON SANDOVAL	b. 🗸 General Negligence	
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11. Plaintiff has suffered a. wage loss b. loss of use of property c. hospital and medical expenses d. general damage f. loss of earning capacity g. other damage (specify):	PI NEGLIGENCE, LIBEL, NEGLIGENT INFLICTION OF I	EMOTIONAL DISTRESS, FALSE
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(2) in the amount of: \$ 15. In the paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers): EX-A, EX-2 Date: MAY 14, 2015 AARON SANDOVAL	The amount of damages is (in cases for personal injury or wrongful death, you mu	ıst check (1)):
15. The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers): EX-A, EX-2 Date: MAY 14, 2015 AARON SANDOVAL		
EX-A, EX-2 Date: MAY 14, 2015 AARON SANDOVAL	(2) in the amount of: \$	
EX-A, EX-2 Date: MAY 14, 2015 AARON SANDOVAL		
Date: MAY 14, 2015 AARON SANDOVAL		s (specify paragraph numbers):
AARON SANDOVAL	EX-A, EX-2	
AARON SANDOVAL		
AARON SANDOVAL		
AARON SANDOVAL	Date: MAV 14 2015	$\langle () / h \rangle$
	Date. 1917.1 14, 2013	$\sim \sim (11)$
	LA PONGANIPONA	
(TYPE OR PRINT NAME) (SIGNATURE OF PLAINTIFF OR ATTORNEY)	AARON SANDOVAL Y Y	1
, , , , , , , , , , , , , , , , , , , ,	(TYPE OR PRINT NAME) (SIC	GNATURE OF PLAINTIFF OR ATTORNEY)

	_		
SHORT TITLE:			PLD-PI-001
AARON SANDON	'AL v. (KPNC)	CASE NUMBER:	
	(==:)		
FIRST	CAUSE OF ACTIO	N—General Negligence	Page 4
(numb	er)		
ATTACHMENT	Cross - Complaint Cross - Complaint	aint	
(Use a separate c	ause of action form for each cause of action.,		
GN-1. Plaintiff (na	me): AARON SANDOVAL		
alleges th	at defendant <i>(name):</i> KAISER PERMAI	NENTE NORTHERN CALIFORN	ЙA
		\$ (T)	
· 			
_	Does 1 to 20		
was the le	gal (proximate) cause of damages to plaintiff.	By the following acts of omissions to act.	defendant
negligently	caused the damage to plaintiff		a o romanii
	MAY 15, 2013		
at (place):	CAMERON PARK, CALIFORNIA	160	
(descriptio	n of reasons for liability):		
	AL INJURY MEDICAL NEGLIGE	NCE	
		(5)	
PLAINT	IFF WAS A PATIENT OF DEFEND	OANTS. PLAINTIFF WAS MADE	E AWARE HIS
MEDIÇA	AL RECORDS ERROR ON OR ABO	OUT MAY 15.2013 (EX-A) IN CA	MERON PARK
DEFENI	DANTS AND DOES 1-20 WERE MA	ADE AWARE OF THOSE ERRO	RS IN
PLAINT	IFF'S MEDICAL RECORDS VIA T	ELEPHONE CONVERSATIONS	, AND IN
WRITIN	G (EX-A). PLAINTEF MOTIFIED]	DEFENDANT PER CCP:364-365	(EX-A)
DEFENI	DANT REFUSE TO CORRECT PLA	INTIFF'S MEDICAL RECORDS	DENTANTS
CONTIN	UE TO HARM PLAINTIFF, THRO	UGH DEFENDANTS DIRECT A	CTIONS, AND
INACCT	ION.		
DEFENI	OANTS AND DOES 1-20 HAVE INI	FLICTED PERSONAL INJURIES	S. CAUSED
AND CO	NTINUE TO CAUSE PAIN AND S	UFFERING, ALL ACCORDING	TO PROOF AT

TRIAL

							PLD-PI-001(
SHORT TITLE:					CASE NUM	BER	
AARON SANDO	VAL v. (KPNC)						
SECOND	CALL	CE OE	AOTION		<u> </u>		
(number)	LAU	SE UF	ACHON-	Intentiona	I Tort	Page	5
ATTACHMENT TO	Complaint	Cre	oss - Complain	t			
(Use a separate c	ause of action form fo	or each cau	se of action.)				
IT-1. Plaintiff (nan	ne): AARON SAI	NDOVAI					
alleges that d	efendant (<i>name</i>): K	AISER P	ERMANEN	TE		(Q/s)	
					\wedge	C10	
					(Ban		
V	Does 1	to	20				
					(0)		
caused the	al (proximate) cause damage to plaintiff MAY 15, 2013	of damages	s to plaintiff. By	the following acts of	or omissions to	o act, defendan	t intentionally
	AMERON PAR	K, CALI	FORNIA	119			
(description	of reasons for liability	v):		9kg			
LIBEL	,		<u> </u>	93)			
				\sim			

PLAINTIFF WAS A PATIENT OF DEFENDANTS. DEFENDANTS MADE UNTRUE WRITTEN STATEMENTS IN PLAINTIFF'S MEDICAL RECORDS. DEFENDANT CREATED, MAINTAINS, AND CONTROLS, PLAINTIFF'S MEDICAL RECORDS. DEFENDANT WAS NOTIFIED IN WRITING OF PLAINTIFF'S MEDICAL RECORD UNTRUTHS (EX-A). DEFENDANTS PUBLICALLY PUBLISHED PLAINTIFF'S MEDICAL RECORDS CONTAINING WRITTEN UNTRUTHS. DEFENDANTS REFUSED OPPORTUNITY TO CORRECT UNTHUTHS BEFORE PUBLIC PUBLISHING AND RELEASING PLAINTIFF'S MEDICAL RECORDS (EX-A). DEFENDANT WRITTEN UNTRUTHS ARE UNSUBSTANTIATED, AND BASELESS. PLAINTIFF HAS BEEN, AND CONTINUES TO BE, INJURED BY DEFENDANTS TOTAL DISREGARD FOR THE TRUTH IN DEFENTANTS' PUBLICATIONS.

DEFENDANTS AND DOES 1-20 HAVE INFLICTED PERSONAL INJURY, HARM, PAIN AND SUFERING TO PLAINTIFF, ALL ACCORDING TOPROOF AT TRIAL.

						PLD-PI-001(
SHORT TITLE:				CASE NUMBE	ER .	
AARON SANDOV	AL v. (KPNC)					
THIRD	CAUSE	OF ACTION	—Intentional	l Tort	Page	6
(number)	······································				i age _	
ATTACHMENT TO	Complaint	Cross - Complair	nt			
(Use a separate cau	ise of action form for ea	ch cause of action.)				
IT-1. Plaintiff (name)	: AARON SANDO	OVAL				
alleges that defe	endant (<i>name</i>): KAISI	ER PERMANEN	TE		(O)	
				^ (7	
					\bigcirc	
					/	
V	Does 1	to 20				
caused the da	(proximate) cause of da mage to plaintiff AY 15, 2013	mages to plaintiff. By	the following acts o	missions to	act, defendant i	ntentionally
at (place): C	AMERON PARK, (CALIFORNIA	(1/2)			
	reasons for liability):		an			
INTENTIO	NAL INFLICTION	OF EMOTION	DISTRESS			

PLAINTIFF WAS A PATIENT OF DEFENDANTS. DEFENDANTS MADE OFFINSIVE JOKES, COMMENTS AND REMARKS TOWARDS PLAINTIFF, PLAINTIFF'S WIFE AND AT PLAINTIFF'S DIBILITATING NEUROLOGICAL INJURIES, WHILE IN DEFENDANTS' OFFICES, AND MEDICAL EXAMINGING ROOM. DEFENDANTS WERE INTENTIONAL AND RECKLESS IN DEFENDANTS' OFFENSIVE JOKES, REMARKS AND COMMENTS DIRECTED SPECIFICALLY AT PLAINTIFF AND HIS NEUROLGICAL INJURIES. PLAINTIFF HAS SUFERED SEVERE MENTAL AND EMOTIONAL DISTRESS DUE TO DEFENDANTS' INTENTIONAL AND TOTAL DISREGARD FOR PLAINTIFF'S SEVERE AND COMPLETELY DIBILITATING NEUROLOGICAL INJURIES. DEFENDANTS' ACTION HAVE CAUSED AND CONTINUE TO CAUSE PLAINTIFF DEPRESSION, ANXIETY, SLEEPLESSNESS AND LACK OF SELF WORTH.

DEFENDANTS AND DOES 1-20 HAVE INFLICTED PERSONAL INJURY, HARM, PAIN AND SUFERING TO PLAINTIFF, ALL ACCORDING TOPROOF AT TRIAL.

							PLD-PI-001(
SHORT TITLE:					CASE NUME	BER	
AARON SANDOVAL	v. (KPNC)						
					<u> </u>		
FOURTH	CAU	SE OF	ACTION-	-Intentiona	l Tort	Page	7
(number)						. ugo	
ATTACHMENT TO	Complaint	☐ Cr	oss - Complain	t			
(Use a separate cause	of action form fo	r each cau	use of action.)				
IT-1. Plaintiff (name):	AARON SAN	IDOVA	Ĺ				
alleges that defend	ant (<i>name</i>): KA	AISER P	ERMANEN	TE		0/0	
					△ .	(7)	
					and the same of th		
₩ Do	pes <u>1</u>	to	20				
was the legal (pro caused the dama on (date): MAN	ge το plainτiπ	of damage	s to plaintiff. By	the following acts	or omissions to	act, defendan	t intentionally
at (place): CAN	IERON PAR	K, CALI	FORNIA	11(2)			
(description of rea	sons for liability):		an			
FALSE LIGH	T	•		W)~			
			(2)	>			

PLAINTIFF WAS A PATIENT OF DEFENDANTS. DEFENDANTS PUBLISHED AND INCLUDED ERRORS IN PLAINTIFF'S MEDICAL RECORDS. AFTER THE MEDICAL RECORD ERRORS WERE DISCOVERED BY PLAINTIFF, DEFENDANTS WERE NOTIFIED OF THOSE ERRORS (EX-A). PLAINTIFF ASKED DEFENTANTS TO REMOVE THOSE ERRORS (EX-A). DEFENTANTS REFUSED TO REMOVE THOSE ERRORS. DEFENTANTS RELEASED PLAINTIFF'S MEDICAL RECORDS AND THE ERRORS CONTAINED THEREIN, TO OTHER PUBLIC PARTIES. DEFENDANTS HAVE ALLOWED UNTRUE, DEFAMATORY, AND PERSONALLY HARMFUL INFORMATION ABOUT PLAINTIFF TO BE RE-PUBLISHED AND USED TO INJUR PLAINTIFF. ANY ENTITIY WOULD CONSIDER THIS OFFENSIVE, INFLAMITORY, AND PERSONAL ABUSE.

DEFENDANTS AND DOES 1-20 HAVE INFLICTED PERSONAL INJURY, HARM, PAIN AND SUFERING TO PLAINTIFF, ALL ACCORDING TOPROOF AT TRIAL.

	PLD-PI-001(6)
SHORT TITLE: AARON SANDOVAL v. KAISER PERMANENTE (KPNC)	CASE NUMBER:
Exemplary Damages Attachr	nent Page <u></u>
ATTACHMENT TO Complaint Cross - Complaint	
EX-1. As additional damages against defendant (name): KAISER PERMANENTE (KPNC) and DOES 1-20	
Plaintiff alleges defendant was guilty of windice fraud oppression as defined in Civil Code section 3294, and plaintiff should recover, in addito make an example of and to punish defendant. EX-2. The facts supporting plaintiff's claim are as follows: Plaintiff(s) made Defendant Kaiser Permanente Norther Calibirector of KPNC Roseville, KPNC secratary Mrs. Wong or about May 15, 2013, of (n)umerous medical file errors, in records. Plaintiff Aaron Sandoval medical records, with thos have/are being used against Plaintiff(s), in ongoing PNC D reliance by defendants, by PI cases, and DOJ cases as legal of EX-4 Correspondance of Medical Record Errors May 15, 20 California.	forma (KPNC), KPNC Doctors, and KPNC member services aware, on Plaintiff Aaron Sandoval medical e same errors still in the records, octor Depositoins, Expert Witness defences. As recent as April 2015.
EX-3. The amount of exemplary damages sought is a. not shown, pursuant to Code of Civil Procedure section 425.10 b. \$	