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| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):<br><b>AARON SANDOVAL</b><br>2061 RIESLING WAY<br>PLACERVILLE, CALIFORNIA 95667-8874<br><br>TELEPHONE NO: 530.957.4407 FAX NO. (Optional):<br>E-MAIL ADDRESS (Optional):<br>ATTORNEY FOR (Name): <b>pro se</b>  |  | FOR COURT USE ONLY<br><br><b>EL DORADO CO. SUPERIOR CT.</b><br><br><b>FILED MAY 14 2015</b><br>BY <u><i>Jen</i></u> Deputy<br><br>Assigned to<br>Judge Warren C. Stracener<br>For all purposes |  |
| SUPERIOR COURT OF CALIFORNIA, COUNTY OF <b>EL DORADO</b><br>STREET ADDRESS: 3321 CAMERON PARK DRIVE<br>MAILING ADDRESS: 3321 CAMERON PARK DRIVE<br>CITY AND ZIP CODE: CAMERON PARK, 95682<br>BRANCH NAME: CAMERON PARK SUPERIOR COURT CIVIL DIV.   |  |  |  |
| PLAINTIFF: <b>AARON SANDOVAL</b><br><br>DEFENDANT: <b>KAISER PERMANENTE NORTHERN CALIFORNIA (KPNC)</b><br><input checked="" type="checkbox"/> DOES 1 TO 20   |  |  |  |
| <b>COMPLAINT—Personal Injury, Property Damage, Wrongful Death</b><br><input type="checkbox"/> AMENDED (Number): (4) Negligence, Libel, Emotional Distress<br>Type (check all that apply):<br><input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): False light<br><input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death<br><input checked="" type="checkbox"/> Personal Injury <input checked="" type="checkbox"/> Other Damages (specify): Exemplary               |  |  |  |
| Jurisdiction (check all that apply):<br><input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE<br>Amount demanded <input type="checkbox"/> does not exceed \$10,000<br><input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000<br><input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)<br><input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint<br><input type="checkbox"/> from limited to unlimited<br><input type="checkbox"/> from unlimited to limited |  | CASE NUMBER:<br><br><b>PC 20150240</b>   |  |

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 pages:

## 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:

AARON SANDOVAL v. AISER PERMANENTE NORTHERN CA

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): (KPNC)(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): 1-10 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): 11-20 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, anda. ☒ has complied with applicable claims statutes, orb. ☐ is excused from complying because (specify):

CCP: 364-365 (EX-A)

SHORT TITLE:

AARON SANDOVAL v. AISER PERMANENTE NORTHERN CA

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):

PI NEGLIGENCE, LIBEL, NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS, FALSE LIGHT

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):

EXEMPLARY, AND ACCORDING TO PROOF AT TRIAL

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 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: \$

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

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE:

AARON SANDOVAL v. (KPNC)

CASE NUMBER:

FIRST

(number)

**CAUSE OF ACTION—General Negligence**Page 4ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): AARON SANDOVAL

alleges that defendant (name): KAISER PERMANENTE NORTHERN CALIFORNIA

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): MAY 15, 2013

at (place): CAMERON PARK, CALIFORNIA

(description of reasons for liability):

PERSONAL INJURY MEDICAL NEGLIGENCE

PLAINTIFF WAS A PATIENT OF DEFENDANTS. PLAINTIFF WAS MADE AWARE HIS MEDICAL RECORDS ERROR ON OR ABOUT MAY 15, 2013 (EX-A) IN CAMERON PARK. DEFENDANTS AND DOES 1-20 WERE MADE AWARE OF THOSE ERRORS IN PLAINTIFF'S MEDICAL RECORDS VIA TELEPHONE CONVERSATIONS, AND IN WRITING (EX-A). PLAINTIFF NOTIFIED DEFENDANT PER CCP:364-365 (EX-A). DEFENDANT REFUSE TO CORRECT PLAINTIFF'S MEDICAL RECORDS. DEFENDANTS CONTINUE TO HARM PLAINTIFF, THROUGH DEFENDANTS DIRECT ACTIONS, AND INACTION.

DEFENDANTS AND DOES 1-20 HAVE INFLICTED PERSONAL INJURIES, CAUSED AND CONTINUE TO CAUSE PAIN AND SUFFERING, ALL ACCORDING TO PROOF AT TRIAL.

SHORT TITLE:

AARON SANDOVAL v. (KPNC)

CASE NUMBER

SECOND

(number)

**CAUSE OF ACTION—Intentional Tort**Page 5

ATTACHMENT TO



Complaint



Cross - Complaint

*(Use a separate cause of action form for each cause of action.)*

IT-1. Plaintiff (name): AARON SANDOVAL

alleges that defendant (name): KAISER PERMANENTE

Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
 on (date): MAY 15, 2013

at (place): CAMERON PARK, CALIFORNIA

*(description of reasons for liability):*

LIBEL

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 UNTRUTHS 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 DEFENDANTS' PUBLICATIONS.

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

SHORT TITLE:

AARON SANDOVAL v. (KPNC)

CASE NUMBER

THIRD

(number)

**CAUSE OF ACTION—Intentional Tort**Page 6

ATTACHMENT TO



Complaint



Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): AARON SANDOVAL

alleges that defendant (name): KAISER PERMANENTE

Does 1to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
on (date): MAY 15, 2013

at (place): CAMERON PARK, CALIFORNIA

(description of reasons for liability):

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

PLAINTIFF WAS A PATIENT OF DEFENDANTS. DEFENDANTS MADE OFFENSIVE JOKES, COMMENTS AND REMARKS TOWARDS PLAINTIFF, PLAINTIFF'S WIFE AND AT PLAINTIFF'S DIBILITATING NEUROLOGICAL INJURIES, WHILE IN DEFENDANTS' OFFICES, AND MEDICAL EXAMINING 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.

SHORT TITLE:

AARON SANDOVAL v. (KPNC)

CASE NUMBER

FOURTH

(number)

**CAUSE OF ACTION—Intentional Tort**Page 7ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

IT-1. Plaintiff (name): AARON SANDOVAL

alleges that defendant (name): KAISER PERMANENTE

☒ Does 1 to 20

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant intentionally caused the damage to plaintiff  
on (date): MAY 15, 2013

at (place): CAMERON PARK, CALIFORNIA

(description of reasons for liability):

FALSE LIGHT

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 DEFENDANTS TO REMOVE THOSE ERRORS (EX-A). DEFENDANTS REFUSED TO REMOVE THOSE ERRORS. DEFENDANTS 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 ENTITY WOULD CONSIDER THIS OFFENSIVE, INFLAMMATORY, AND PERSONAL ABUSE.

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

SHORT TITLE:

AARON SANDOVAL v. KAISER PERMANENTE (KPNC)

CASE NUMBER:

**Exemplary Damages Attachment**

Page

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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

- ☒ malice  
☒ fraud  
☒ oppression

as defined in Civil Code section 3294, and plaintiff should recover, in addition to actual damages, damages to 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 California (KPNC), KPNC Doctors, Director of KPNC Roseville, KPNC secratary Mrs. Wong, and KPNC member services aware, on or about May 15, 2013, of (n)umerous medical file errors, in Plaintiff Aaron Sandoval medical records. Plaintiff Aaron Sandoval medical records, with those same errors still in the records, have/are being used against Plaintiff(s), in ongoing KPNC Doctor Depositoins, Expert Witness reliance by defendants, by PI cases, and DOJ cases, as legal defences. As recent as April 2015. EX-4 Correspondance of Medical Record Errors May 15, 2013 to Kaiser Permanente North California.

EX-3. The amount of exemplary damages sought is

- a. ☒ not shown, pursuant to Code of Civil Procedure section 425.10.  
b. ☐ \$