

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

CLIFFORD HICKMAN,
4712 Olde Forge Court
Fairfax, Virginia 22032,

Plaintiff,

v.

Case No. 2016 06482

MID-ATLANTIC PERMANENTE
MEDICAL GROUP, P.C.
2101 E. Jefferson Street
Rockville, Maryland 20852,

and

KAISER FOUNDATION HEALTH PLAN OF
THE MID-ATLANTIC STATES, INC.
2101 E. Jefferson Street
Rockville, Maryland 20852,

Defendants.

COMPLAINT

YOUR PLAINTIFF, CLIFFORD HICKMAN, ASSERTS:

1. That, upon information and belief, during the period October 15, 2013 and May 19, 2014 and at all other times pertinent to his allegations of professional negligence herein, the defendants Mid-Atlantic Permanente Medical Group, P.C. and the Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc. were a foreign professional corporation and foreign corporation respectively offering medical services to the public that were authorized to conduct business in Virginia and that they were, in fact, at that time conducting business in Virginia.

2. That he was in the continuous care of health care provider employees and/or agents of the defendants, including but not limited to Christopher Ryan, M.D, acting

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JOHN T. FREY
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FAIRFAX, VA

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during the course of and within the scope of their employment of agency with them during the period October 15, 2013 through May 19, 2014 for various medical problems that he been experiencing, including benign prostatic hyperplasia. The treatment that they provided him was performed at various of their locations in Fairfax County, Virginia.

3. That on October 15, 2013 during the course of the defendants' employees and agents treatment of him it was noted that he had a significant and unexpected elevation of his blood pressure. Over the next several months he experienced continued elevated blood pressure, abdominal pain, headaches, weight loss, and increased urinary frequency and incontinence, all of which he related to Christopher Ryan, M.D. and other of the defendants' health care provider employees and/or agents.

4. That, despite his continuing and increasing complaints, of which he informed the defendants' health care provider employees and/or agents, it was not until May 19, 2014 that Dr. Ryan referred him to a Urologist for a consultation.

5. That, pursuant to Dr. Ryan's referral, on May 20, 2014 he was examined by Steven P. Guarnaccia, M.D., a Urologist, who diagnosed him with bilateral hydronephrosis with a very distended bladder for which he has since then and as a direct result thereof required and undergone significant active medical treatment, including surgery, as a consequence of which he has suffered a severe, permanent loss of the function of his kidneys.

6. That during the period October, 2013 through May 19, 2014 and at all times material to his allegations of professional negligence herein he entrusted his medical care and well being to the defendants' health care provider employees and/or agents, including Christopher Ryan, M.D., and relied upon them to provide him with appropriate and prudent medical care and attention.

7. That in their treatment of the symptoms and medical problems that he was experiencing during the period October 15, 2013 through May 19, 2014 the defendants' health care provider employees and/or agents, including Christopher Ryan, M.D., owed to him a duty to render professional services to him with the degree of skill and diligence practiced by reasonably prudent practitioners in their fields of medicine in the Commonwealth of Virginia.


8. That the defendants' health care providers' employees and/or agents, including Christopher Ryan, M.D., breached the duty that they owed to him in the circumstances presented by, among other negligent acts and/or omissions that may be determined to exist after completion of discovery in this matter, failing to performing blood work and other diagnostic testing and to obtain necessary consultations with specialists to determine the cause of and to appropriately treat his elevated blood pressure and the other continuing and increasingly severe symptoms that he was experiencing during the period October 15, 2013 through May 19, 2014, for which the defendants are jointly liable to him pursuant to the legal theory of **respondeat superior**.

9. That, as a direct and proximate result of the professional negligence of the defendants' health care provider employees and/or agents, including Christopher Ryan, M.D., as set forth in part above, for which they are jointly liable, he has sustained damages for which the law entitles him to compensation. Among these, but not limited to them, are;

- (a) severe personal injuries;
- (b) medical expenses, including doctors, hospitals, nursing, medication, therapy and rehabilitation expenses;
- (c) disfigurement;
- (d) embarrassment and humiliation;
- (e) great physical pain and suffering;
- (f) mental anguish;

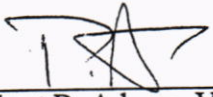
- (g) a loss of wages and wage-earning capacity;
- (h) inconvenience and discomfort;
- (i) temporary total disability and permanent partial disability, both physical and emotional, and

WHEREFORE, the plaintiff, Clifford Hickman, respectfully requests the entry of a verdict and judgment against the defendants jointly and severally for compensatory damages in the full and just amount of TWO MILLION DOLLARS (\$2,000,000.00), plus pre and post-judgment interest and costs, as allowed by law.



Plaintiff, by counsel

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