



FILED
14 JAN 24 PM 4:24
CIRCUIT COURT
FOR MULTNOMAH COUNTY

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

Veille Arthur,

Plaintiff,

vs.

Kaiser Foundation Health
Plan of the Northwest

Defendant

00882

No. 1401-00882

COMPLAINT FOR
NEGLIGENCE

Amount Sought: \$30,000

COMES NOW plaintiff and complains and alleges as follows:

On or about March 26, 2013, plaintiff, a member of defendant's Kaiser Permanente health care system was under defendant's care at its Division Clinic in Multnomah County for an electro-cardiogram.

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An agent of defendant had plaintiff sit on an exam-type table, remove his shirt, and lay back. When plaintiff did so a portion of the table under the upper part of plaintiff's body smashed to the floor, the impact resulting in injury to plaintiff's neck, the loss of a tooth, and tremendous pain and suffering, to plaintiff's noneconomic damage in an amount not exceeding \$30,000.

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Defendant's conduct causing the impact and plaintiff's injuries and damages was negligent as hereinafter more fully alleged.

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Defendant's conduct causing plaintiff's injuries was negligent in that defendant failed to check if the table top was secured or failed to secure the table top before having plaintiff lay back on it.

WHEREFORE, against defendant, judgment is demanded by plaintiff for non-economic damages of \$30,000, plus costs and disbursements herein incurred.



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