ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):	FOR COURT USE ONLY
Rochelle M. Abrams 524 Lakemead Way	
Emerald Hills, CA 94062	
Emercial Times, Ort 7 1002	
TELEPHONE NO: (650)369-8020 FAX NO. (Optional): (650)593-3121	
E-MAIL ADDRESS (Optional): rochelle@aaracing.com	
ATTORNEY FOR (Name): Pro Se	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Mateo	FILED
STREET ADDRESS: 400 County Center	I' I LI LI LI
MAILING ADDRESS: 400 County Center	SAN MATEO COUNTY
CITY AND ZIP CODE: Redwood City, CA 94063	MAY/ 2 2 2914
BRANCH NAME: Southern Branch	/ / /1
PLAINTIFF: Rochelle M. Abrams	Clerk of the Superior Court
	By American
DEFENDANT: Kaiser Foundation Hospitals	
Kaiser Foundation Health Plan, Inc.	
DOES 1 TO	
COMPLAINT—Personal Injury, Property Damage, Wrongful Death	
AMENDED (Number):	的 <sup>~</sup>
Type (check all that apply):	
MOTOR VEHICLE OTHER (specify):	
Property Damage Wrongful Death	
Personal Injury Other Damages (specify):	
Jurisdiction (check all that apply):	CASE NUMBER:
ACTION IS A LIMITED CIVIL CASE	
Amount demanded does not exceed \$10,000 exceed \$25,000	<b>604</b> = 0 0 = 0 0
ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)	<b>CIV</b> 5 2 8 7 0 8
ACTION IS RECLASSIFIED by this amended complaint	
from limited to unlimited	
from unlimited to limited	
1. Plaintiff (name or names): Rochelle M. Abrains	
alleges causes of action against defendant (name or names):	
Kaiser Foundation Hospitals; Kaiser Foundation Health Plan, Inc.	
2. This pleading, including attachments and exhibits, consists of the following number of page	ges: 6
3. Each plaintiff named above is a competent adult	<b>3</b> 00. 0
a. a. except plaintiff (name): Kaiser Foundation Hospitals	
(1) a comporation qualified to do business in California	
(2) an unincorporated entity (describe):	
(3) a public entity (describe):	
(4) aminor an adult	
(a) for whom a guardian or conservator of the estate or a guard	lian ad litem has been appointed
(b) other (specify):	
(5) other (specify):	
b. except plaintiff (name): Kaiser Foundation Health Plan, Inc.	
(1) a corporation qualified to do business in California	
<ul><li>(2) an unincorporated entity (describe):</li><li>(3) a public entity (describe):</li></ul>	•
(4) a minor an adult	
(a) for whom a guardian or conservator of the estate or a guard	lian ad litem has been appointed
(b) other (specify):	ad ikom nad been appointed
(5) other (specify):	
( )	
Information about additional plaintiffs who are not competent adults is shown in Atta	chment 3.

۱ :	SHORT TITLE:	CASE NUMBER:
	Abrams v. Kaiser Foundation Hospitals et al.	
4.	Plaintiff (name): Rochelle M. Abrams	
	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	and and the area la
		endant (name): business organization, form unknown
		corporation
	(3) an unincorporated entity (describe): (3) a	n unincorporated entity (describe):
		(93)
	(4) a public entity (describe):	public entity (describe):
	(5) other (specify): (5) o	her (specify)
	(	
	b. vexcept defendant (name): Kaiser Foundation He d. except defe	ndant (name):
	<u> </u>	business organization, form unknown
	7.7==	corporation
	(3) an unincorporated entity (describe):	n unincorporated entity (describe):
	(4) a public entity (describe):	public entity (describe):
	(4) a public entity (describe).	public entity (describe).
	(5) other (specify):	her (specify):
	Information about additional defendants who are not natural persons is contained	ed in Attachment 5.
6.	The true names of defendants sued as Does are unknown to plaintiff.	
		ere the agents or employees of other
	named defendants and acted within the scope of that agency or employme	nt.
		e persons whose capacities are unknown to
7.	plaintiff.  Defendants who are joined under Code of Civil Procedure section 382 are (nar	nest.
′.	Defendants who are joined under Code of Civil Procedure Section 302 are (Mar	nes).
8.	This sailed is the work accused	
Ο.	This court is the proper court because  a at least one defendant now resides in its jurisdictional area.	
	<ul> <li>b.</li></ul>	l association is in its jurisdictional area
	c.  injury to person or damage to personal property occurred in its jurisdictional	
	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):	

SHO	RT TITLE:	CASE NUMBER:				
Ab	rams v. Kaiser Foundation Hospitals et al.					
10.	The following causes of action are attached and the statements above apply to each (excauses of action attached):  a Motor Vehicle  b General Negligence  c Intentional Tort  d Products Liability  e Premises Liability  f Other (specify):	ach complaint must have one or more				
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):					
12.	The damages claimed for wrongful death and the relationships of plaintiff to the death a. I listed in Attachment 12. b. as follows:	eceased are				
13.	The relief sought in this complaint is within the jurisdiction of this court.  Plaintiff seeks all damages available under both law and equity					
14.	Plaintiff prays or judgment for costs of suit; for such relief as is fair, just, and equitable a. (1)  compensatory damages (2)  punitive damages  The amount of damages is (in cases for personal injury or wrongful death, you must (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):				
Date	Date: May 22, 2014					
Roc	Rochelle M. Abrams  (Type OR DRINT NAME)  (SIGNATURE OF BLANTIEF OR ATTORNEY)					

			PLD-PI-001(4
SHORT TITLE: Abrams v. Ka	aiser Foundation Hospitals et al	CASE NUMBER:	
1 ATTACHM	CAUSE OF ACTION—Premise (number)  MENT TO Complaint Cross - Complaint	es Liability	Page1
	MENT TO Complaint Cross - Complaint parate cause of action form for each cause of action.)		
Prem.L-1.	Plaintiff (name): Rochelle M. Abrams alleges the acts of defendants were the legal (proximate) cause of On (date): May 24, 2012 plaintiff was injured.		emises in the following
	fashion (description of premises and circumstances of injury):	6	
	While transporting her disabled mother to a medical appropriation Hospitals, medical office building (Cypress Redwood City, California, plaintiff and her mother were while attempting to push a wheelchair over the threshold	Building) at 1190 e struck by a closi	Veterans Boulevard,
Prem.L-2.	Count One—Negligence The defendants who negligently operated the described premises were (names):  Kaiser Foundation Hospitals  Does to	owned, maintained, n	nanaged and
Prem.L-3.	Count Two—Willful Failure to Warn (Civil Code section 8 or maliciously failed to guard or warn against a dangerous (names):  Does to Plaintiff, a recreational user, was an invited guest	condition, use, structu	ire, or activity were
Prem.L-4.	Count Three Dangerous Condition of Public Property on which a dangerous condition existed were (names):  Does to  The defendant public entity had actual dangerous condition in sufficient time prior to the b The condition was created by employees of the defendant public entity had actual dangerous condition was created by employees of the defendant public entity had actual dangerous condition was created by employees of the defendant public entity had actual actual the defendant public entity had	constructive notion	ce of the existence of the
Prem.L-5.	a. Allegations about Other Defendants The defendants who other defendants and acted within the scope of the agency Kaiser Foundation Health Plan, Inc.	•	d employees of the
	Does to		
	b. The defendants who are liable to plaintiffs for other reasons described in attachment Prem.L-5.b as follows:		their liability are