

1. **Plaintiff (name or names):** Nida Noble  
alleges causes of action against **defendant (name or names):**  
Sarah Lynn Schuler, Southern California Permanente Medical Group, Kaiser Foundation Health Plan, Kaiser

2. This pleading, including attachments and exhibits, consists of the following number of pages: 4

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.

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NOBLE v. SCHULER, KAISER SCPMG et al

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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): Southern California Pe c. ☒ except defendant (name): Kaiser Foundation Hosp  
(1) ☒ a business organization, form unknown (1) ☒ a business organization, form unknown  
(2) ☐ a corporation (2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe): (3) ☐ an unincorporated entity (describe):  
  
(4) ☐ a public entity (describe): (4) ☐ a public entity (describe):  
(5) ☐ other (specify): (5) ☐ other (specify):
- b. ☒ except defendant (name): KFHP, Inc. d. ☒ except defendant (name): Kaiser Hospitals  
(1) ☐ a business organization, form unknown (1) ☒ a business organization, form unknown  
(2) ☒ a corporation (2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe): (3) ☐ an unincorporated entity (describe):  
  
(4) ☐ a public entity (describe): (4) ☐ a public entity (describe):  
(5) ☐ other (specify): (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): 1-20 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): 21-40 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, and  
a. ☒ has complied with applicable claims statutes, or  
b. ☐ is excused from complying because (specify):

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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*):

Medical Malpractice (Medical Negligence)

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*):

Plaintiff claims economic damages, including past and future wage loss, medical expense, and non-economic damages, including past and future, shock, fright, pain, loss of enjoyment of life, all according to proof.

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*):

All except where stated

Date: May 28, 2014

Joel Selik

(TYPE OR PRINT NAME)

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

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FIRST

(number)

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

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

GN-1. Plaintiff (name): Nida Noble

alleges that defendant (name): All Defendants, Sara Lynn Schuler MD, SCMPG, KAISER

☒ Does 1 to 40

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 30, 2013 & after

at (place): Kaiser Permanente Medical Center, various locations

(description of reasons for liability):

Defendants and each of them provided substandard care for Plaintiff's work injury. Due to the negligence of Defendants and each of them, As a result of substandard care, Nida has suffered permanent injury to her spinal cord and surrounding tissues, causing ongoing, debilitating pain and weakness which prevents her from doing the work she was trained for (ultrasonography), activities of daily living, and severely limits her enjoyment of life.