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IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
Civil Division

JOSEPHINE MORINA
4315 New Hampshire Avenue, NE
Washington, DC 20011

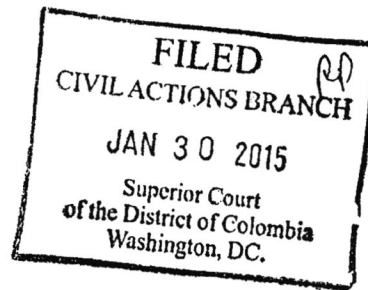
Plaintiff,

vs.

Kaiser Permanente, AKA
Kaiser Foundation Health Plan Inc., AKA
Kaiser Foundation Health Plan of the
Mid-Atlantic States, Inc., AKA
Kaiser Foundation Hospitals, AKA
and their Affiliates

Serve: Prentice-Hall Corporation Sytem, Inc.
(Registered Agent)
1090 Vermont Ave., NW
Washington, DC 20005

Defendants.



Civil Case No.

15 - 0000732

COMPLAINT

1. This Court has jurisdiction pursuant to D.C. Code Annotated, 1973 Edition, as amended, Sec. 11-921.
2. Plaintiff Josephine Morina (hereinafter "Morina") is an adult citizen of the United States and currently resides in the District of Columbia.
3. Defendant Kaiser Permanente a/k/a Kaiser Foundation Health Plan Inc., a/k/a Kaiser Foundation Health Plan of the Mid-Atlantic States, a/k/a Kaiser Foundation Hospitals, Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc. (hereinafter "Kaiser"), and their affiliates, is and was at all times relevant a corporation organized under the laws of the State of Maryland to provide medical care, treatment and services to the public, including patients receiving care and treatment in the District of Columbia such as Josephine Morina.



3. On or about February 1, 2012, plaintiff visited the Kaiser facility on Capitol Hill, located at 700 2nd Street, NE, Washington, DC 20002.
4. On said date, plaintiff visited the Capitol Hill Kaiser facility to be treated for her rheumatoid arthritis condition.
5. After her appointment concluded, she waited in the lobby for her transportation to arrive.
6. While she was waiting, she had an accident and went to the bathroom on herself. She went up to the urgent care help counter and asked a man for assistance.
7. The man at the help counter escorted plaintiff to the bathroom and attempted to transfer her from her wheelchair to the commode.
8. As the man attempted to transfer plaintiff to the commode he twisted her in a violent manner and caused multiple fractures to her lower extremities.
9. The man then called for help, placed her back in her chair and took her upstairs for x-rays that revealed multiple fractures to her lower extremities, upper extremity, and resulting injuries.
10. At all times relevant, Plaintiff was conducting herself in a careful and cautious manner and, notwithstanding said fact, she was injured as a result of the acts or omission of Defendant's agent or employee.
11. As a result, Plaintiff suffered serious bodily injury, including a fractures to her lower extremity, and upper extremity. Plaintiff has suffered significant losses as a result of her injury and has become significantly more impaired as a result of her injuries.

COUNT I: NEGLIGENCE
(DEFENDANT KAISER PERMANENTE)

12. Paragraphs 1-11 are hereby incorporated by reference and re-alleged as if fully restated herein.

13. Defendant Kaiser, and its agents, servants and employees, owned plaintiff numerous duties including a duty of reasonable care while she was on the business premises, a duty to properly and competently care for her while on the premises and, if they undertook the duty to assist her to the bathroom, to do so in a reasonably competent manner.
14. Defendant Kaiser, and its agents, servants and employees, breached these duties.
15. Defendant Kaiser, through the acts or omissions of its agents, servants or employees, caused injury to the plaintiff.
16. As the direct or proximate result of the Defendant's negligence as aforesaid, Plaintiff suffered serious painful and permanent injury to her person which have required her to expend funds for medical treatment. In addition Plaintiff has and will continue to suffer pain and discomfort, loss of mobility and function, loss of enjoyment of life, mental anguish and emotional distress.

WHEREFORE Plaintiff demands judgment against Defendant Kaiser as and for compensatory damages in the sum of One Million (\$1,000,000) Dollars plus the costs of these proceedings, interest and attorney fees.

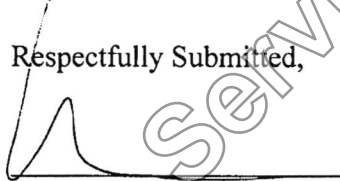
COUNT II: RESPONDEAT SUPERIOR/VICARIOUS LIABILITY
(DEFENDANT KAISER PERMANENTE)

17. Paragraphs 1-16 are hereby incorporated by reference and re-alleged as if fully restated herein.
18. The acts and omissions of Defendant Kaiser, its agents and/or employees were performed in the scope of and authority of their employment and/or agency with Defendant Kaiser.
19. The acts and omissions of Defendant Kaiser, its agents and/or employees were performed in the scope of and authority of, and at the direction of, Defendant Kaiser.

20. To the extent that any negligent act or omission is attributable to any servant, agent and/or employee of Defendant Kaiser, under the theory of respondeat superior, Defendant Kaiser is responsible.

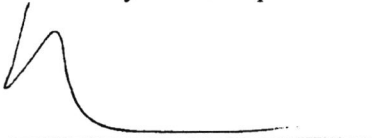
WHEREFORE Plaintiff demands judgment against Defendant Kaiser as and for compensatory damages in the sum of One Million (\$1,000,000) Dollars plus the costs of these proceedings, interest and attorney fees.

Respectfully Submitted,


Kevin Finnegan
(Bar No. 459693)
Goldberg, Finnegan & Mester, LLC
8401 Colesville Road, Suite 630
Silver Spring, MD 20910
(301) 589-2999
Attorney for Plaintiff

JURY DEMAND

Plaintiff demands a jury trial on the issues presented by this Complaint.


Kevin Finnegan