

Jeffrey Jacobs (140057)

Jacobs Law Group  
1420 River Park Drive  
Suite 100  
Sacramento, CA 95815

TELEPHONE NO: 916-569-1600

FAX NO. (Optional): 916-569-1618

E-MAIL ADDRESS (Optional):

ATTORNEY FOR (Name): Alexandra Wilson

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento**

STREET ADDRESS: 720 Ninth Street

MAILING ADDRESS:

CITY AND ZIP CODE: Sacramento 95814

BRANCH NAME:

**PLAINTIFF:** Alexandra Wilson

**DEFENDANT:** Kaiser Foundation Health Plan, INC; Kaiser Permanente Medical Group; Kaiser Foundation Hospitals; Suzanne Camille Montoya; Krisztian Janos Kapinya; Lynn Chien; Jonica Calkins; Ramona Copachi; Peter Mohr; Dignity Health and Does 1-50

☒ DOES 1 TO 50

**COMPLAINT—Personal Injury, Property Damage, Wrongful Death**

☐ AMENDED (Number):

Type (check all that apply):

☐ MOTOR VEHICLE

☒ OTHER (specify):

☐ Property Damage

☒ Wrongful Death

☐ Personal Injury

☐ Other Damages (specify):

Jurisdiction (check all that apply):

☐ ACTION IS A LIMITED CIVIL CASE

Amount demanded

☐ does not exceed \$10,000

☐ exceeds \$10,000, but does not exceed \$25,000

☒ ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)

☐ ACTION IS RECLASSIFIED by this amended complaint

☐ from limited to unlimited

☐ from unlimited to limited

CASE NUMBER:

1. **Plaintiff (name or names):** Alexandra Wilson

alleges causes of action against defendant (name or names): Kaiser Foundation Health Plan, INC; Kaiser Permanente Medical Group; Kaiser Foundation Hospitals; Suzanne Camille Montoya; Krisztian Janos Kapinya; Lynn Chien; Jonica Calkins; Ramona Copachi; Peter Mohr; Dignity Health; Does 1-50

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

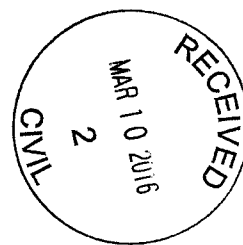
(a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed

(b) ☐ other (specify):

(5) ☐ other (specify):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

FOR COURT USE ONLY



SHORT TITLE: Wilson v. Kaiser Foundation Health Plan, INC.

CASE NUMBER:

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): Kaiser  
Foundation Health Plan, Inc.

- (1) ☒ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe):  
  
(4) ☐ a public entity (describe):  
  
(5) ☐ other (specify):

c. ☒ except defendant (name): Kaiser Foundation  
Hospitals

- (1) ☒ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe):  
  
(4) ☐ a public entity (describe):  
  
(5) ☐ other (specify):

b. ☒ except defendant (name): Kaiser  
Permanente Medical Group

- (1) ☒ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe):  
  
(4) ☐ a public entity (describe):  
  
(5) ☐ other (specify):

d. ☒ except defendant (name): Dignity Health

- (1) ☒ a business organization, form unknown  
(2) ☐ a corporation  
(3) ☐ an unincorporated entity (describe):  
  
(4) ☐ a public entity (describe):  
  
(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): 1-50 \_\_\_\_\_ 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): 1-50 \_\_\_\_\_ 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):

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): wrongful death

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):

Wrongful death damages as seen below,  
prejudgment interest according to statute

12. ☒ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☒ as follows:

Financial support that Andria Quinell (decedent) would have contributed to plaintiffs; loss of gifts and benefits that decedent would have given to plaintiffs; funeral and burial expenses; value of decedent's contribution to household services; loss of decedent's love/companionship/comfort/care/assistance/protection/affection/society/moral support; loss of decedent's training and guidance and any other economic and non-economic damages according to California law

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):

Date:

3/10/16

Jeffrey Jacobs

(TYPE OR PRINT NAME)

SBNN

140057



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

SHORT TITLE: Wilson v. Kaiser Foundation Health Plan,  
— INC.

CASE NUMBER:

**ATTACHMENT (Number):** One

(This Attachment may be used with any Judicial Council form.)

First Cause of Action - Wrongful Death  
(Against all defendants)

Attachment to Complaint

This cause of action incorporates all previously plead paragraphs.

On or around the time of Andria Quinnell's (decedent) death, plaintiff Alexandra Wilson was decedent's daughter.

On or around March 11, 2015 Andria Quinnell was seen at the Kaiser Permanente Medical Group's Fair Oaks Blvd, Sacramento, CA clinic by Dr. Suzanne Camille Montoya. The EKG showed that Andria was having an inferior MI. After consulting with Dr. Kapinya in cardiology, Dr. Montoya told Andria that she could drive herself to the emergency room at Kaiser's Morse Avenue Hospital. Dr. Kapinya told Dr. Montoya that it was ok for Andria to drive herself to Morse Avenue if she was not then experiencing chest pain. The Morse Avenue hospital did not offer the services and the treatment Andria Quinnell needed.

Andria left the Fair Oaks clinic and drove to the Morse Avenue Hospital and collapsed at the ER check in window while waiting in line.

After unnecessary delay, Andria was eventually transferred to Mercy General Hospital, she had no detectable blood pressure or pulse on arrival. Mercy was unsuccessful in treating Andria. Andria was pronounced dead one hour after transfer from Kaiser Morse to Mercy General.

Andria Quinnell's death was proximate caused by the negligence and malpractice of the named defendants, and others and by Kaiser Permanente Medical Group, Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals. Her death was also caused by the nonmedical and financial policies, procedures and practices of these Kaiser entities which deprived Andria of the medical treatment that she required.

As a direct and proximate result of decedent's death, plaintiff suffered: loss of financial support that decedent would have contributed to plaintiff; loss of gifts and benefits that decedent would have given to plaintiff; funeral and burial expenses; loss of decedent's contribution to household services; loss of decedent's love, companionship, comfort, care, assistance, protection, affection, society and moral support. As a direct and proximate result of decedent's death, plaintiffs suffered loss of decedent's training and guidance. As a direct and proximate result of decedent's death, plaintiffs suffered other economic and non-economic damages recognized by law.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page \_\_\_\_ of \_\_\_\_

(Add pages as required)