

**\* PLAINTIFF(S)**  
Melissa Danielle Cullen  
 ATTORNEY, FIRM NAME, ADDRESS AND TELEPHONE  
 BBO# \_\_\_\_\_

**\* DEFENDANT(S)**  
Planned Parenthood  
 ATTORNEY (IF KNOWN)

Place an x in one box only:  
 Origin code and track designation

<input checked="" type="checkbox"/> 1. F01 Original Complaint	<input type="checkbox"/> 4. F04 District Court Appeal c.231, s. 97B (After trial)
<input type="checkbox"/> 2. F02 Removal to Sup.Ct. C.231, s.104 (Before trial) (F)	<input type="checkbox"/> 5. F05 Reactivated after rescript; relief from judgment/ Order (Mass.R.Civ.P. 60)
<input type="checkbox"/> 3. F03 Retransfer to Sup.Ct. C.231, s.102C (X)	<input type="checkbox"/> 6. E10 Summary Process Appeal

TYPE OF ACTION AND TRACK DESIGNATION (See reverse side)

CODE NO.	TYPE OF ACTION (specify)	TRACK	Yes/No	IS THIS A JURY CASE?
<u>306</u>	<u>malpractice medical</u>	<u>A</u>		

The following is a full, itemized and detailed statement of the facts on which plaintiff relies to determine money damages. For this form, disregard double or treble damage claims; indicate single damages only.

**TORT CLAIMS**  
 (Attach additional sheets as necessary)

A. Documented medical expenses to date:

1. Total hospital expenses	\$ <u>600</u>
2. Total Doctor expenses	\$ <u>600</u>
3. Total chiropractic expenses	\$ _____
4. Total physical therapy expenses	\$ <u>1000</u>
5. Total other expenses (describe)	\$ _____
Subtotal	\$ _____

B. Documented lost wages and compensation to date: \$ 1000  
 C. Documented properly damages to date: \$ \_\_\_\_\_  
 D. Reasonably anticipated future medical and hospital expenses: \$ 100000  
 E. Reasonably anticipated lost wages: \$ \_\_\_\_\_  
 F. Other documented items of damages (describe): \$ \_\_\_\_\_

G. Brief description of plaintiff's injury, including nature and extent of injury (describe):  
Concussion, permanent scarring/disfigurement of face, sprained neck, emotional trauma, PTSD, blood loss,  
 Total \$ 100,000

**CONTRACT CLAIMS**  
 (Attach additional sheets as necessary)

Provide a detailed description of claim(s):

TOTAL \$ \_\_\_\_\_

PLEASE IDENTIFY, BY CASE NUMBER, NAME AND COUNTY, ANY RELATED ACTION PENDING IN THE SUPERIOR COURT DEPARTMENT

"I hereby certify that I have complied with the requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods."

Signature of Attorney of Record: [Signature] Date: 9-5-12  
 A.O.S.C. 3-2007

RECEIVED  
 CIVIL ACTION DEPARTMENT  
 2012 SEP-5 PM 2:25  
 MICHAEL JOSEPH D'ONOFRIO  
 CLERK MAGISTRATE

COMMONWEALTH OF MASSACHUSETTS

FOLK, ss.

SUPERIOR COURT  
CIVIL ACTION

NO. 12-3299 A

Melissa Danielle Cullen  
PLAINTIFF(S) (PRINT NAME CLEARLY)

vs.

COMPLAINT

Planned Parenthood  
DEFENDANT(S) (PRINT NAME CLEARLY)

PARTIES

1. Plaintiff(s) reside(s) at 39 Highland Ave #3 Everett MA 02149  
Street City or Town  
in the County of \_\_\_\_\_

2. Defendant(s) reside(s) at 1055 Commonwealth Ave Boston MA 02115  
Street City or Town  
in the County of \_\_\_\_\_

2012 SEP -01 PM 2:25  
MICHAEL JOSEPH DUNOYAN  
CLERK/MAGISTRATE  
SUPERIOR COURT  
FOLK COUNTY

FACTS

3. In August of 2012, I Melissa Cullen received a suction abortion at Planned Parenthood. 3 hours after leaving the clinic I was taken by ambulance to Mass General Hospital in Boston. I was told the abortion had been done wrong, I had suffered extreme blood loss which had caused me to black out when I left the clinic. Due to losing consciousness after the abortion I fainted hit my head 2 times once in the front, breaking 2 of my teeth and splitting my chin open. I needed 4 stitches in my chin which left a life-long permanent scar. I suffered a concussion, sprained neck, which

has caused me to miss many days of work, I suffered from PTSD which has prevented me from going to Boston where the incident happened. I am permanently physically + mentally damaged due to this malpractice.

4. Answer this question only if you are seeking a restraining order against the defendant(s):

Have there been any other Court proceedings, criminal or civil, involving you or your family members and the defendant or defendant's family members?

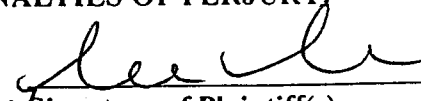
Yes \_\_\_\_\_ No

If Yes, describe the Court proceeding(s) and its/their status. \_\_\_\_\_

WHEREFORE, plaintiff demands that:  
X \$100,000. for dental, medical, therapeutic + lost wages.

SIGNED UNDER THE PENALTIES OF PERJURY.

X DATE: 9-5-12

  
X Signature of Plaintiff(s)  
39 Highland Ave #3  
X Street Address  
Everett, WA  
X City/Town  
857 236 5902  
X Telephone

**Commonwealth of Massachusetts  
SUFFOLK SUPERIOR COURT  
Case Summary  
Civil Docket**

### Cullen v Planned Parenthood

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Details for Docket: SUCV2012-03299

#### Case Information

<b>Docket Number:</b>	SUCV2012-03299	<b>Caption:</b>	Cullen v Planned Parenthood
<b>Filing Date:</b>	09/05/2012	<b>Case Status:</b>	Needs review for service
<b>Status Date:</b>	09/05/2012	<b>Session:</b>	Civil A, 3 Pemberton Sq, Boston
<b>Lead Case:</b>	NA	<b>Case Type:</b>	Most

#### Tracking Deadlines

<b>TRK:</b>	A	<b>Discovery:</b>	08/26/2014
<b>Service Date:</b>	12/04/2012	<b>Disposition:</b>	08/21/2015
<b>Rule 15:</b>	11/29/2013	<b>Rule 12/19/20:</b>	02/02/2013
<b>Final PTC:</b>	02/22/2015	<b>Rule 56:</b>	10/25/2014
<b>Answer Date:</b>	01/03/2013	<b>Jury Trial:</b>	NO

#### Case Information

<b>Docket Number:</b>	SUCV2012-03299	<b>Caption:</b>	Cullen v Planned Parenthood
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<b>Status Date:</b>	09/05/2012	<b>Session:</b>	Civil A, 3 Pemberton Sq, Boston
<b>Lead Case:</b>	NA	<b>Case Type:</b>	Medical malpractice

#### Tracking Deadlines

<b>TRK:</b>	A	<b>Discovery:</b>	08/26/2014
<b>Service Date:</b>	12/04/2012	<b>Disposition:</b>	08/21/2015
<b>Rule 15:</b>	11/29/2013	<b>Rule 12/19/20:</b>	02/02/2013
<b>Final PTC:</b>	02/22/2015	<b>Rule 56:</b>	10/25/2014
<b>Answer Date:</b>	01/03/2013	<b>Jury Trial:</b>	NO

### Parties Involved

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2 Parties Involved in Docket: SUCV2012-03299

<b>Party Involved:</b>		<b>Role:</b>	Defendant
<b>Last Name:</b>	Planned Parenthood	<b>First Name:</b>	
<b>Address:</b>		<b>Address:</b>	
<b>City:</b>		<b>State:</b>	
<b>Zip Code:</b>		<b>Zip Ext:</b>	
<b>Telephone:</b>			

<b>Party Involved:</b>		<b>Role:</b>	Plaintiff
<b>Last Name:</b>	Cullen	<b>First Name:</b>	Melissa Danielle
<b>Address:</b>	39 Highland Ave	<b>Address:</b>	Apt 3
<b>City:</b>	Everett	<b>State:</b>	MA
<b>Zip Code:</b>	02149	<b>Zip Ext:</b>	

**Telephone:** 857-236-5902

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### Attorneys Involved

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No Attorneys found for Docket: SUCV2012-03299.

There are currently no attorneys associated with this case.

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### Calendar Events

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No Calendar Events found for Docket: SUCV2012-03299.

There are currently no calendar events associated with this case.

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### Full Docket Entries

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5 Docket Entries for Docket: SUCV2012-03299

<b>Entry Date:</b>	<b>Paper No:</b>	<b>Docket Entry:</b>
09/05/2012	1	Affidavit of indigency and Request for Waiver, substitution or state
09/05/2012	1	payment of normal fees & costs, granted (IMPOUNDED)
09/05/2012		Origin 1, Type B06, Track A.
09/05/2012	2	Complaint
09/05/2012	3	Civil action cover sheet filed(\$100,000.00)

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