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COMMONWEALTH OF MASSACHUSETTS

WORCESTER, ss

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CIVIL ACTION NO. 1885CV373C

Celina Casas,
Plaintiff,

v.

Planned Parenthood League of
Massachusetts, Inc., and Rebecca Krieger,
RN,
Defendants.

FILED

MAR 05 2018

ATTEST: *[Signature]* CLERK

COMPLAINT AND DEMAND FOR JURY TRIAL

FACT COMMON TO ALL COUNTS

1. The Plaintiff Celina Casas ("Ms. Casas") is an individual currently residing in Cicero, Illinois. At all times relevant hereto, she was a resident of Shrewsbury, Worcester County, Massachusetts.
2. The Defendant Planned Parenthood League of Massachusetts, Inc. ("Planned Parenthood") at all times relevant was and is a corporation duly organized and existing under the laws of the Commonwealth of Massachusetts, with a confidential and unpublished principal place of business. At all times relevant hereto, Planned Parenthood operated a clinic in Worcester, Worcester County, Massachusetts.

3. The Defendant Rebecca Krieger, RN (“Nurse Krieger”) at all times relevant was a registered nurse duly licensed to practice medicine in the Commonwealth of Massachusetts and an agent, servant or employee of Planned Parenthood.
4. On or about March 12, 2015, a doctor, whose name is redacted from the medical records and whose identity is unknown, performed the first step in a two –step abortion at the Planned Parenthood clinic in Worcester by softening the cervix.
5. This first-step placed Ms. Casas at risk for vaginal delivery of the fetus.
6. Neither the doctor who performed the procedure nor Nurse Krieger, who discharged Ms. Casas, ever informed her that she was at risk for vaginal delivery of the fetus.
7. By failing to inform Ms. Casas of the risk of vaginal delivery of the fetus, the unknown doctor and Nurse Krieger breached the standard of care applicable to each of them. .
8. The following day, March 13, 2015, Ms. Casas began experiencing severe labor type pains and called Planned Parenthood looking for advice and instructions. Ms. Casas was told to take the pain medication that she had been prescribed; she was not advised that she was at risk for a vaginal delivery and she was not instructed to seek medical attention.
9. That night Ms. Casas delivered the fetus in the bathroom of her home, causing her physical pain and severe emotional and mental trauma.

COUNT ONE—MEDICAL NEGLIGENCE

Ms. Casas vs. Planned Parenthood and Nurse Krieger

10. Ms. Casas incorporates by reference all of the averments in paragraphs 1-9.
11. The unknown doctor and Nurse Krieger breached the applicable standard of care on March 12, 2018 when they failed to advise Ms. Casas that the first step of the two step procedure placed her at risk for vaginal delivery of the fetus.
12. The agent, servant, and/or employee of Planned Parenthood who failed to advise Ms. Casas that she was at risk for vaginal delivery of the fetus and who failed to advise her to see medical attention when she called complaining of pain on March 13, 2014 also breached the applicable standard of care.
13. Planned Parenthood is vicariously liable for the negligence of the unknown doctor and Nurse Krieger and the person who failed to instruct Ms. Casas to seek medical attention when she called to complain of pain.
14. As a direct and proximate result of the above-referenced breaches of the standard of care, Ms. Casas was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for her medical, surgical, and hospital care and treatment; has suffered and will continue to suffer great pain of body and anguish of mind; has been and will continue to be unable to pursue normal activities; and her ability to earn income and enjoy life has been permanently adversely affected.

WHEREFORE, the Plaintiff Celina Casas demands judgment against the Defendants Planned Parenthood League of Massachusetts, Inc., and Rebecca Krieger, RN in an amount which will

fully and fairly compensate her for all of her injuries, past, present and future, together with interest and costs.

THE PLAINTIFF CLAIM A TRIAL BY JURY ON ALL ISSUES.

The Plaintiff, Celina Casas by her attorneys,



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