

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X

SHARA DEJESUS,

Plaintiff,

- against -

**VERIFIED AMENDED
COMPLAINT**

PLANNED PARENTHOOD HUDSON PECONIC,
INC., MIRIAM CREMER, M.D., QUEENS LONG
ISLAND MEDICAL GROUP, P.C., MICHAEL ALAN
LEE, M.D., BHANUMATHY VINAYAGASUNDARAM,
M.D., JOHN T. MATHER MEMORIAL HOSPITAL,
and THE MOUNT SINAI HOSPITAL,

Defendants.

-----X

Plaintiff, SHARA DEJESUS, by her attorney, the LAW OFFICE OF ROBERT F. DANZI, for her Verified Amended Complaint, respectfully alleges upon information and belief:

1. At all times herein, plaintiff, SHARA DEJESUS was and still is a resident of the County of Suffolk, State of New York.

2. Upon information and belief, at all times herein, defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., was and still is a domestic, not-for-profit corporation duly organized and existing under the laws of the State of New York.

3. Upon information and belief, at all times herein, defendant, MIRIAM CREMER, M.D. was and still is a physician and surgeon duly licensed to practice medicine in the State of New York.

4. Upon information and belief, at all times herein, defendant, QUEENS LONG ISLAND MEDICAL GROUP, P.C., was and is a domestic professional corporation duly organized and existing under the laws of the State of New York with its principal place of business located at 1000 Zeckendorf Boulevard, Garden City, New York 11530.

5. Upon information and belief, at all times herein, defendant, MICHAEL ALAN LEE, M.D., was and still is a physician duly licensed to practice medicine in the State of New York.

6. Upon information and belief, at all times herein, defendant, BHANUMATHY VINAYAGASUNDARAM, M.D., was and still is a physician duly licensed to practice medicine in the State of New York.

7. Upon information and belief, at all times herein, defendant, JOHN T. MATHER MEMORIAL HOSPITAL, was and still is a domestic, not-for-profit corporation duly organized and existing under the laws of the State of New York.

8. Upon information and belief, at all times herein, defendant, THE MOUNT SINAI HOSPITAL, was and still is a domestic, not-for-profit corporation duly organized and existing under the laws of the State of New York.

9. Upon information and belief, at all times herein, defendant, MIRIAM CREMER, M.D. was a member of and/or agent of and/or employed by defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., and was acting within the scope of her employment and/or agency.

10. Upon information and belief, at all times herein, defendant, MIRIAM CREMER, M.D. was a member of and/or agent of and/or employed by defendant, THE MOUNT SINAI HOSPITAL, and was acting within the scope of her employment and/or agency.

11. Upon information and belief, at all times herein, defendant, MICHAEL ALAN LEE, M.D. was a member of and/or agent of and/or employed by defendant, QUEENS LONG ISLAND MEDICAL GROUP, P.C., and was acting within the scope of his employment and/or agency.

12. Upon information and belief, at all times herein, defendant, BHANUMATHY VINAYAGASUNDARAM, M.D. was a member of and/or agent of and/or employed by defendant, QUEENS LONG ISLAND MEDICAL GROUP, P.C., and was acting within the scope of his employment and/or agency.

13. Upon information and belief, from February 27, 2010 up to and including May 15, 2010, defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., rendered medical care and treatment to plaintiff, SHARA DEJESUS including but not limited to the performance of an abortion.

14. Upon information and belief, from February 27, 2010 up to and including May 15, 2010, defendant, MIRIAM CREMER, M.D., rendered medical care and treatment to plaintiff, SHARA DEJESUS including but not limited to the performance of an abortion.

15. Upon information and belief, from March, 2010 up to and including June, 2010, defendant, QUEENS LONG ISLAND MEDICAL GROUP, P.C., rendered medical care and treatment to plaintiff, SHARA DEJESUS including but not limited to evaluation and treatment of back and groin pain, among others.

16. Upon information and belief, from April, 2010 up to and including June, 2010, defendant, MICHAEL ALAN LEE, M.D. rendered medical care and treatment to plaintiff, SHARA DEJESUS including but not limited to evaluation and treatment of back and groin pain, among others.

17. Upon information and belief, from April, 2010 up to and including June, 2010, defendant, BHANUMATHY VINAYAGASUNDARAM, M.D. rendered medical care and treatment to plaintiff, SHARA DEJESUS including but not limited to evaluation and treatment of back and groin pain, among others.

18. Upon information and belief, on April 13, 2010 and June 8, 2010 up to and including June 25, 2010, defendant, JOHN T. MATHER MEMORIAL HOSPITAL, rendered medical care and treatment to plaintiff, SHARA DEJESUS including but not limited to evaluation and treatment of chest palpitations, among others.

19. Upon information and belief, from June 1, 2010 up to and including June 5, 2010, defendant, THE MOUNT SINAI HOSPITAL, rendered medical care and treatment to plaintiff, SHARA DEJESUS including but not limited to including but not limited to dilation and evacuation.

20. Upon information and belief, from June 1, 2010 up to and including June 5, 2010, defendant, MIRIAM CREMER, M.D., rendered medical care and treatment to plaintiff, SHARA DEJESUS including but not limited to dilation and evacuation.

21. Defendant, PLANNED PARENTHOOD HUDSON PECONIC, INC., is vicariously liable for the acts of negligence of its employees, agents, and/or servants that rendered care and treatment to the plaintiff herein.

22. Defendant, QUEEN LONG ISLAND MEDICAL GROUP, P.C., is vicariously liable for the acts of negligence of its employees, agents, and/or servants that rendered care and treatment to the plaintiff herein.

23. Defendant, JOHN T. MATHER MEMORIAL HOSPITAL is vicariously liable for the acts of negligence of its employees, agents, and/or servants that rendered care and treatment to the plaintiff herein.

24. Defendant, THE MOUNT SINAI HOSPITAL, is vicariously liable for the acts of negligence of its employees, agents, and/or servants that rendered care and treatment to the plaintiff herein.

FIRST CAUSE OF ACTION

25. At all times herein, defendants rendered medical and surgical care to plaintiff, SHARA DEJESUS.

26. At all times herein, plaintiff received medical care and treatment from the defendants, PLANNED PARENTHOOD HUDSON PECONIC, INC., MIRIAM CREMER, M.D., QUEENS LONG ISLAND MEDICAL GROUP, P.C., MICHAEL ALAN LEE, M.D., BHANUMATHY VINAYAGASUNDARAM, M.D., JOHN T. MATHER MEMORIAL HOSPITAL, and THE MOUNT SINAI HOSPITAL.

27. The defendants undertook to care for the plaintiff.

28. At all times herein mentioned, defendants owed their patients and in particular, the plaintiff herein, the duty and standard of care which is normally exercised by such physicians and their employees, servants and agents that they are competent, skillful and careful, and acting in accordance with accepted standards, procedures and practices in the State of New York. Specifically, but not by way of limitation and among other things, the defendants failed to properly and completely perform an abortion and failed to properly care for and treat plaintiff thereafter.

29. Defendants breached their obligation to render appropriate medical care and treatment to plaintiff herein.

30. Defendants, their agents, servants and/or employees were careless, negligent and committed malpractice in the medical care and treatment rendered to plaintiff.

31. All of the above occurred through no fault or lack of care on the part of the plaintiff.

32. Solely and wholly as a result of the carelessness, negligence and malpractice of defendants, their agents, servants and/or employees, plaintiff sustained and suffered serious, severe and permanent personal injuries accompanied by conscious pain and anguish.

33. By reason of the foregoing, plaintiff sustained damages in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

SECOND CAUSE OF ACTION

34. Defendants failed to inform plaintiff of the risks, benefits, hazards and alternatives associated with the treatment rendered and procedures performed in connection with the medical care, diagnosis and treatment rendered to plaintiff, so that an informed consent could be given.

35. A reasonably prudent person in the plaintiff's position would not have undergone the treatment rendered and procedures performed in connection with the medical care, diagnosis and treatment of the plaintiff if she had been fully informed of the risks, benefits, hazards and alternatives connected with said treatment.

36. The failure to adequately and fully inform plaintiff of the risks, benefits, hazards and alternatives of the treatment rendered and procedures performed are a proximate cause of the injuries plaintiff sustained.

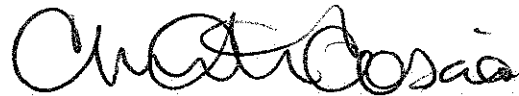
37. As a consequence of the foregoing there was no informed consent to the care rendered and procedures utilized to plaintiff in connection with the medical care, diagnosis and treatment rendered to plaintiff.

38. By reason of the foregoing, plaintiff sustained damages in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

39. This Supplemental Summons and Amended Complaint is being filed and served with permission of the Court and counsel for all defendants as set forth on page 7 of the Preliminary Conference Order dated July 11, 2012 attached hereto.

WHEREFORE, plaintiff demands judgment against the defendants on all causes of action in sums which exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction and for such other relief as this court may deem just and proper.

Dated: Westbury, New York
July 17, 2012

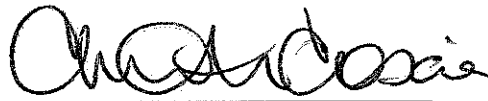


LAW OFFICE OF ROBERT F. DANZI
Attorney for Plaintiff
900 Merchants Concourse, Suite 314
Westbury, New York 11590
(516) 228-4226

CERTIFICATE OF MERIT

I, Christine Coscia, an associate of the Law Office of Robert F. Danzi, attorney for the above named plaintiff, affirm that I have reviewed the facts of the case as presented by the claimant and have consulted with a physician licensed to practice medicine in the State of New York and who practices in the medical specialties involved herein and who I reasonably believe is knowledgeable in the relevant issues involved herein and I, as attorney for the plaintiff, have concluded on the basis of such review and consultation that there is a reasonable basis for the commencement of the within action.

Dated: Westbury, New York
July 17, 2012

A handwritten signature in black ink, appearing to read "Christine Coscia", written in a cursive style.

Christine Coscia

ATTORNEY'S VERIFICATION

CHRISTINE COSCIA, an attorney duly admitted to practice in the county of New York affirms under penalties of perjury:

I am an associate with the LAW OFFICE OF ROBERT F. DANZI, attorney for plaintiff.

I have read the attached SUPPLEMENTAL SUMMONS AND AMENDED COMPLAINT and know the contents thereof; it is true to my own knowledge, except as to the matters therein alleged to be on information and belief, and as to those matters I believe them to be true. This verification is made by me because plaintiff does not reside within the county where we maintain our office.

Dated: Westbury, New York
July 17, 2012


CHRISTINE COSCIA

INSTRUCTIONS: PLEASE TYPE OR PRINT NEATLY MAKING SURE ALL WRITING IS CLEAR AND LEGIBLE ON EACH COPY

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

X IAS PART

1

Shara Dejesus

HON. Martin Shulman

Plaintiff(s)

-against-

- (1) Planned Parenthood Hudson/Levonia, Inc.
- (2) John Doe, M.D.
- (3) Queens Long Island Medical Group, P.C.
- (4) Michael Alan Lee, M.D.
- (5) Chandramathy Vinayagasundaram, M.D.
- (6) John T. Mather Memorial Hospital
- (7) The Mount Sinai Hospital
- (8) Miriam Cremer, M.D.

Defendant(s)

**Preliminary Conference
Stipulation and Order
For Medical, Dental and
Podiatric Malpractice
Actions**

INDEX NO:

150347/11

RJI DATE:

5/22/12

BRIEF CASE DESCRIPTION:

Failed termination of pregnancy leading to severe sepsis, total hysterectomy + more.

APPEARANCES:

Plaintiff:	Shara Dejesus Shara De Jesus
Firm:	Law Office of Robert F. Danzi
By:	Christine Coscia
Phone/Fax:*	516-228-4226 / 516-228-6569
E-mail:*	Christine@Danzilaw.com

* not for service purposes

Defendant 1:	Planned Parenthood Hudson Peconic & John De, M.D.
Firm:	McAloon & Friedman, P.C.
By:	Kenneth Fox
Phone/Fax:*	212-732-8700 / 212-227-2903
E-mail:*	KonFox@mcf-ESQ.COM

* not for service purposes

Defendant 2:	John T. Mather Memorial Hospital
Firm:	Fumuso Kelly, DeBerna Snyder, Sweet & Farrell, LLP
By:	James DeVerina
Phone/Fax:*	631-232-0200
E-mail:*	jdeverina@fldssf-law.com

* not for service purposes

Defendant 3:	Mt. Sinai Hospital and Dr. Cromer (to the extent she rendered treatment @ Mt. Sinai)
Firm:	Kantman, Borquest and Ryan
By:	Stacey Schwimmer
Phone/Fax:*	212-980-9600
E-mail:*	sschwimmer@kbrlaw.com

* not for service purposes

If there are Defendants # 4 or # 5 or others in this case, please insert pages for additional parties.

Queen's Univ School Med Corp, PC & Dr. Lee & SILVERMAN, Parsons, Leland, LLP WINDYBAGASUNDAK...
 NANCY MARTIN
 212-557-1518
 NMARTIN@SPLLC.COM

THIS ACTION having come on for a Preliminary Conference pursuant to Section 202.56 of the Uniform Rules of the New York State Trial Courts in order to establish a schedule for the completion of disclosure and other related matters. The parties stipulate and it is hereby:

ORDERED that the action is entitled to a preference pursuant to CPLR 3403(a)(5), and it is further

ORDERED that there is to be timely compliance with each of the items below within the time set forth unless the time is extended by a "so-ordered" OR court-approved written stipulation.

I. INSURANCE INFORMATION

Insurance coverage information shall be provided in writing with respect to each defendant for all applicable periods within 30 (thirty) days as follows [check applicable spaces:]

- Primary coverage, including insurance carrier, policy number(s) and policy coverage periods;
- Excess coverage, including insurance carrier, policy number(s) and policy coverage periods; and
- Declaration sheets.

II. BILL OF PARTICULARS

(a) A further Verified Bill of Particulars shall be served upon each defendant within 20 (twenty) days as to the following items:

See additional archives

(b) Defendant(s) shall serve upon plaintiff a Verified Bill of Particulars as to the affirmative defenses and/or counterclaims in the Answer (when demanded) within 20 (twenty) days.

III. MEDICAL RECORDS AND AUTHORIZATIONS

(a) HIPAA-compliant medical authorizations, *if not already provided with the Bill of Particulars*, shall be furnished to defendant(s) within 20 (twenty) days as to the following health care providers:

PCP, collateral source, pharmacy, OB/GYN, hospitalizations, VAG, infectious disease, mental health to extent not already provided

(b) Following plaintiff's deposition, plaintiff shall provide HIPAA-compliant authorizations for appropriate records within 10 (ten) days of receipt of a written request from the defendant(s).

(c) Medical records shall be furnished by the defendant(s) within 30 (thirty) days as follows [check where applicable, and identify specifically]:

1. Office records, including reports and correspondence. _____
2. Hospital chart. _____
3. Billing records. _____
4. Autopsy report. _____
5. Radiology film/report. _____
6. Curriculum vitae of defendant(s). _____
7. Hospital rules and regulations. _____
8. Other. _____

(d) If a medical record to be supplied by a defendant is not available, within 30 (thirty) days, an affidavit shall be supplied by defendant, or by a records custodian with personal knowledge, which shall set forth a statement concerning the customary record-keeping practices of the physician/hospital, and the date, nature and location of the search conducted, including all efforts undertaken to locate such records.

(e) If the records described in paragraph (d) above are subsequently located, they shall be promptly supplied to all parties. Any party who fails to produce such items more than 30 (thirty) days after they are located but, in any event, no later than 30 (thirty) days prior to trial shall be precluded from introducing the items into evidence, unless good cause is demonstrated.

IV. DEPOSITIONS

- * All dates listed below are dates certain and may **NOT** be adjourned unless the time is extended by a "so-ordered" OR court-approved written stipulation.
- ◆ Inability to obtain medical records prior to the deposition dates shall **NOT** be cause for adjournment of the deposition. If the records subsequently obtained reveal the need for additional information, a further limited deposition may be held by agreement of the parties or by Order of the Court.

(a) Dates:

Plaintiff(s) on or before: 9/27/12
 Defendant PPHP on or before 10/30/12
 Defendant QLMG on or before 11/13/12
 Defendant Lee on or before 11/20/12
 Defendant Vinayagasundaram on or before 12/4/12
 Defendant Mather Hosp. on or before 12/18/12
 △ mt. Sinai 1/18/13
 △ Cramer 1/22/13

to designate witness for all institutional Δ's 30 days prior to EBT

THE DEPOSITION OF EACH DEFENDANT SHALL BE CONDUCTED ON THE DATE SET FORTH ABOVE EVEN THOUGH AN EARLIER SCHEDULED DEPOSITION OF ANOTHER DEFENDANT WAS NOT CONDUCTED.

As to bring original medical/hospital chart to every deposition.

(b) Deposition of Institutional Defendant(s): See IV(a)

Within 30 (thirty) days after plaintiff's deposition, plaintiff shall serve upon counsel for any institutional defendant(s) a demand for the identification of no more than 5 (five) health care providers who are referred to, or made entries, in the medical records. Within 20 (twenty) days of service of the demand, the institutional defendant(s) shall provide the full name and employment status of each of these individuals, and, if not under the institution(s)' control, the last known address of each individual. Within 5 (five) business days thereafter, plaintiff shall designate the first witness under the institution(s)' control to be deposed and the institutional defendant(s) shall produce said witness. Plaintiff shall then designate additional witnesses under defendant(s)' control for deposition within 5 (five) business days after said EBT. If the institutional defendant(s) do not voluntarily produce the additional requested witnesses within 20 (twenty) days of plaintiff's designation, plaintiff may seek an order compelling additional depositions pursuant to statute.

All of these individuals shall be deposed on or before _____

(c) Non-Party Witness Depositions:

Plaintiff is to advise defendant(s) within 30 (thirty) days of this Preliminary Conference Order whether the following non-party witnesses will be produced for deposition voluntarily, or whether a subpoena will be necessary. If the latter, plaintiff is to provide the witnesses' last known addresses within 30 (thirty) days of this Stipulation and Order.

Name of Non-Party Witness: _____

Name of Non-Party Witness: _____

(d) Time and Place:

Plaintiff(s)' deposition(s) shall be held at respective counsels' offices commencing at _____ (a.m.) (p.m).

Defendant(s)' deposition(s) shall be held as follows [List the time and place for each deposition]:

(e) Objections:

- ALL questions asked at any deposition must be answered UNLESS they (a) infringe upon a privilege, (b) bear SOLELY on the negligence of a co-defendant and NOT in any way on the potential negligence of the deponent, or (c) are palpably irrelevant.
- If a party makes an objection as to *form*, the objector shall immediately and succinctly indicate the nature of the defect so as to permit correction. In any event, the witness shall answer the question.
- Depositions shall not be interrupted for an attorney-deponent conference.

Counsel for the deponent shall NOT engage in coaching during the deposition and shall NOT suggest answers to questions (e.g. "If you know . . ."; "If you remember . . .").

V. PHYSICAL EXAMINATIONS

Defendant(s) who wishes to conduct a physical or mental examination pursuant to CPLR 3121 shall designate in writing an examining physician or other specialist within 30 (thirty) days of plaintiff's deposition. The examination of the plaintiff must be conducted at least 30 (thirty) days before the filing of the Note of Issue.

Specialty: ob/gyn & psychiatry

Defendant(s) shall serve upon all parties written reports of any examining physician within 60 (sixty) days after the examination, and at least 30 (thirty) days before trial. Pursuant to CPLR 3121, plaintiff shall provide defendant(s) with a written report by any non-treating examining physician within 60 (sixty) days after an examination, and at least 60 (sixty) days before trial.

VI. OTHER DISCLOSURE *

(a) **Witnesses:** Parties shall exchange names and addresses of all FACT WITNESSES concerning liability and/or damages (other than expert witnesses) no later than 60 (sixty) days before trial. Parties shall also exchange adverse party statements within that same period.

(b) **Photographs and Videotapes:** Parties shall exchange all photographs and/or videotapes within 60 (sixty) days after their creation and/or availability but not less than 30 (thirty) days before trial absent a showing of good cause.

(c) **Employment:** If loss of earnings is claimed, authorizations for plaintiff's employment records (including W-2's, 1099's and/or income tax returns) for a period of 5 years before the claimed malpractice and continuing to date, shall be provided within 30 (thirty) days.

(d) **Collateral Sources:** Plaintiff shall provide authorizations for the following collateral source providers within 30 (thirty) days:

(e) **Discovery Notices:** Responses to the following outstanding Discovery and Inspection Notices shall be furnished within 30 (thirty) days:

All outstanding demands of IT to be responded to by As ¹⁰⁷ in 30 days

* This disclosure demand shall be considered ongoing and continuous. If requested items subsequently become available, they are to be supplied immediately upon receipt of the same to all parties to the action.

VII. EXPERT EXCHANGE

Plaintiff shall serve a CPLR 3101(d) expert disclosure no later than 60 (sixty) days before trial.

Defendant(s) shall serve a CPLR 3101(d) expert disclosure no later than 45 (forty-five) days before trial.

VIII. DEATH ACTIONS

In wrongful death actions, plaintiff shall provide the following when available within 30 (thirty) days. If not currently available, then within 30 (thirty) days after receipt of the document: death certificate, letters of administration or letters testamentary, marriage certificate, and authorization for the autopsy reports.

IX. ADDITIONAL DIRECTIVES

① IT to serve amended summons and complaint substituting Miriam Cramer, M.D. for John Doe, M.D. w/ 20 days. Counsel for Plaintiff Parenthood Hudson Peconic will accept service of the amended complaint.

*② IT to respond to correspondence from Mt. Sinai & Dr. Cramer, dated 4/5/12 w/in 30 days

*③ IT to amplify bp as to Mt. Sinai and Dr. Cramer regarding informed consent claim w/in 30 days (par. 17-23)

*④ IT to specify individuals as to whom Mt. Sinai & Cramer are vicariously liable 30 days after EBTs

*⑤ IT to supplement bp as to Cramer + Mt. Sinai re: special damages and lost income amounts 30 days after EBTs.

*2-5 above to extent IT does not sustain an objection per case law +/or CPLR

Any supplements to BP do not waive IT's right to amend BP ~~per~~ per CPLR.

X. NOTE OF ISSUE: The Note of Issue and Certificate of Readiness shall be filed on or before

XI. SUMMARY JUDGEMENT AND/OR OTHER DISPOSITIVE MOTIONS

Motions for Summary Judgement and/or other dispositive motions shall be made no later than 60 (sixty) days from the filing of the Note of Issue, unless the Court directs otherwise.

XII. FURTHER DIRECTIVES: It is

ORDERED that failure to comply with the terms of this STIPULATION AND ORDER may result in sanctions as authorized by CPLR 3126, and it is further

ORDERED that a compliance conference shall be held on 10/24/12 at 9:30 (AM) (PM), and it is further

ORDERED that ALL *prior* discovery orders of this court be brought to any and all subsequent conferences.

Dated: 7-11-12

SO STIPULATED:

Plaintiff: Shara DeJesus
Printed Name: Christine Cascia
Firm Name: Law Office of Robert F. Danzi

Defendant # 1 Planned Parenthood
Printed Name: Kenneth Fox
Firm Name: McMahon & Friedman, P.C.

Defendant # 2 John T. Malter Hosp.
Printed Name: James De Verna
Firm Name: Fumuso, Kelly, et al

Defendant # 3 Mt. Sinai + Dr. Cramer
Printed Name: Stacy Schuman
Firm Name: Kaufman Borocost & Ryan

Defendant # 4 Dr. La
Printed Name: NANCY MARTIN
Firm Name: SILVERSON, Powers & Ladd

Defendant # 5 OLING
Printed Name: NANCY MARTIN
Firm Name: SILVERSON, Powers & Ladd, LLP

Defendant # 6 Dr. VINAYAGASUBRAMANIAM
NANCY MARTIN
SILVERSON, Powers & Ladd, LLP

SO ORDERED:

JUSTICE OF THE SUPREME COURT
HON MARTIN SHULMAN, J.S.C.

STATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)

Mary Bravmann, being sworn, says:

I am not a party to the action, am over 18 years of age and reside at Central Islip, New York.

On July 17, 2012 I served the within

SUPPLEMENTAL SUMMONS and VERIFIED AMENDED COMPLAINT

by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth herein, as follows:

FUMUSO, KELLY, DeVERNA, SNYDER, SWART & FARRELL, LLP
Attorneys for Defendant
JOHN T. MATHER MEMORIAL HOSPITAL
110 Marcus Blvd.
Hauppauge, NY 11788
(631) 232-0200

SILVERSON, PARERES & LOMBARDI, LLP
Attorneys for Defendants
QUEENS LONG ISLAND MEDICAL GROUP, P.C., MICHAEL ALAN LEE, M.D.,
and BHANUMATHY VINAYAGASUNDARAM, M.D.,
192 Lexington Avenue, 17th Floor
New York, NY 10016
(212) 557-1810


McALOON & FRIEDMAN, P.C.
Attorneys for Defendant
PLANNED PARENTHOOD HUDSON PECONIC, INC.
123 William Street, 25th Floor
New York, NY 10038
(212) 732-8700

KAUFMAN, BORGEEST & RYAN, LLP
Attorneys for Defendant
MIRIAM CREMER, M.D. and THE MOUNT SINAI HOSPITAL
120 Broadway, 14th Floor
New York, New York 10271
(212) 980-9600



Mary Bravmann

Sworn to before me this
17th day of July, 2012



Notary Public

MARCI VELLA
Notary Public, State of New York
No. 01VE6066189
Qualified in Nassau County
Commission Expires November 18, 2014
1/18/14

INDEX NO.: 150347/11
SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF SUFFOLK

SHARA DEJESUS,

Plaintiff,

- against -

PLANNED PARENTHOOD HUDSON PECONIC,
INC., "JOHN DOE", M.D., QUEENS LONG ISLAND
MEDICAL GROUP, P.C., MICHAEL ALAN LEE, M.D.,
BHANUMATHY VINAYAGASUNDARAM, M.D.,
JOHN T. MATHER MEMORIAL HOSPITAL, THE
MOUNT SINAI HOSPITAL and MIRIAM CREMER,
M.D.,

Defendants.

SUPPLEMENTAL SUMMONS and VERIFIED AMENDED COMPLAINT

Law Office of Robert F. Danzi
Attorney for Plaintiff
900 Merchants Concourse, Suite 314
Westbury, New York 11590
T: (516) 228-4226
F: (516) 228-6569