

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

ALVIN JONES, JR., as Administrator of the estate of TONYA  
REAVES, deceased, and as Guardian of the estate of ALVIN  
JONES, III,

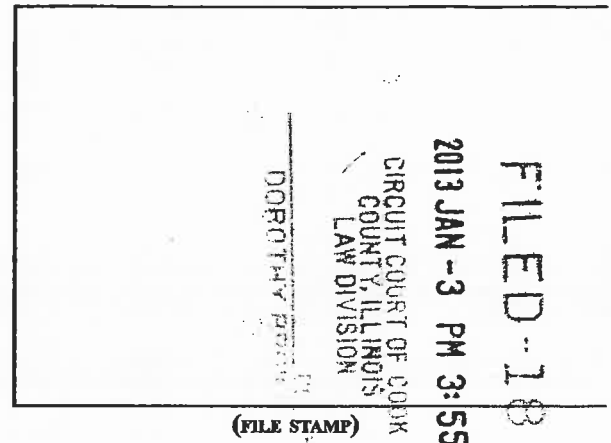
v.

2013L000076  
CALENDAR/ROOM C  
TIME 00:00  
No. Medical Malpractice

PLANNED PARENTHOOD OF ILLINOIS, ALL WOMENS HEALTH,  
S.C., MANDY GITTLER, M.D., NORTHWESTERN MEMORIAL  
HOSPITAL, NORTHWESTERN MEDICAL FACULTY  
FOUNDATION, TACOMA MCKNIGHT, M.D. and JAMIE MCGUIRE,  
M.D.

**CIVIL ACTION COVER SHEET - CASE INITIATION**

A Civil Action Cover Sheet - Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. ONLY ONE (1) CASE TYPE MAY BE CHECKED WITH THIS COVER SHEET.



Jury Demand ☐ Yes ☒ No

**PERSONAL INJURY/WRONGFUL DEATH  
CASE TYPES:**

- ☐ 027 Motor Vehicle
- ☒ 040 Medical Malpractice
- ☐ 047 Asbestos
- ☐ 048 Drunk Shop
- ☐ 049 Product Liability
- ☐ 051 Construction Injuries  
(including Structural Work Act, Road  
Construction Injuries Act and negligence)
- ☐ 052 Railroad/FELA
- ☐ 053 Pediatric Lead Exposure
- ☐ 061 Other Personal Injury/Wrongful Death
- ☐ 063 Intentional Tort
- ☐ 064 Miscellaneous Statutory Action  
(Please Specify Below\*\*)
- ☐ 065 Premises Liability
- ☐ 078 Fen-phen/Redux Litigation
- ☐ 199 Silicone Implant

**TAX & MISCELLANEOUS REMEDIES  
CASE TYPES:**

- ☐ 007 Confession of Judgment
- ☐ 008 Replevin
- ☐ 009 Tax
- ☐ 015 Condemnation
- ☐ 017 Detinue
- ☐ 029 Unemployment Compensation
- ☐ 036 Administrative Review Action
- ☐ 085 Petition to Register Foreign Judgment
- ☐ 099 All Other Extraordinary Remedies

**COMMERCIAL LITIGATION  
CASE TYPES:**

- ☐ 002 Breach of Contract
- ☐ 070 Professional Malpractice  
(other than legal or medical)
- ☐ 071 Fraud  
(other than legal or medical)
- ☐ 072 Consumer Fraud
- ☐ 073 Breach of Warranty
- ☐ 074 Statutory Action  
(Please Specify Below\*\*)
- ☐ 075 Other Commercial Litigation  
(Please Specify Below\*\*)
- ☐ 076 Retaliatory Discharge

**OTHER ACTIONS  
CASE TYPES:**

- ☐ 062 Property Damage
- ☐ 066 Legal Malpractice
- ☐ 077 Libel/Slander
- ☐ 079 Petition for Qualified Orders
- ☐ 084 Petition to Issue Subpoena
- ☐ 084 Petition to Issue Subpoena
- ☐ 100 Petition for Discovery

\*\*

By: \_\_\_\_\_

(Attorney)

(Pro Se)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

IN THE CIRCUIT COURT OF COOK COUNTY  
COUNTY DEPARTMENT, LAW DIVISION

FILED-18

2013 JAN -3 PM 3:55

CIRCUIT COURT OF COOK  
COUNTY, ILLINOIS  
LAW DIVISION

CLERK  
DOROTHY BRONK

ALVIN JONES, JR., as Administrator of the estate )  
of TONYA REAVES, deceased, and as Guardian )  
of the estate of ALVIN JONES, III, )

Plaintiff, )

v. )

No. )

PLANNED PARENTHOOD OF ILLINOIS, )  
ALL WOMEN'S HEALTH, S.C., MANDY )  
GITTLER, M.D., NORTHWESTERN )  
MEMORIAL HOSPITAL, NORTHWESTERN )  
MEDICAL FACULTY FOUNDATION, )  
TACOMA MCKNIGHT, M.D., and JAMIE )  
MCGUIRE, M.D., )

Defendants. )

2013L000076  
CALENDAR/ROOM C  
TIME 00:00  
Medical Malpractice

**COMPLAINT AT LAW**

NOW COMES the Plaintiff, ALVIN JONES, JR., Administrator of the Estate of TONYA REAVES, deceased and Guardian of the Estate of ALVIN JONES III, by his attorneys, PHILLIPS LAW OFFICES, and complains of the Defendants, PLANNED PARENTHOOD OF ILLINOIS, ALL WOMEN'S HEALTH, S.C., MANDY GITTLER, M.D., NORTHWESTERN MEMORIAL HOSPITAL, NORTHWESTERN MEDICAL FACULTY FOUNDATION, TACOMA MCKNIGHT, M.D., and JAMIE MCGUIRE, M.D., and alleges as follows:

**COUNT ONE - WRONGFUL DEATH**

**Planned Parenthood of Illinois, All Women's Health, S.C. & Mandy Gittler, M.D.**

1. At all times pertinent, the Defendant, PLANNED PARENTHOOD OF ILLINOIS, through its agents, servants, and employees, owned, operated, maintained, and

controlled a certain medical facility, where it made facilities available to persons in need of medical and surgical procedures, including but not limited to dilation and evacuation procedures.

2. At all times pertinent, the Defendant, PLANNED PARENTHOOD OF ILLINOIS was an Illinois Corporation and was doing business in the County of Cook, State of Illinois.

3. At all times pertinent, the Defendant, ALL WOMEN'S HEALTH, S.C., through its agents, servants, and employees, provided medical care, treatment, and services to persons in need of medical attention and surgical procedures.

4. At all times pertinent, the Defendant, ALL WOMEN'S HEALTH, S.C., was an Illinois corporation and was doing business in the County of Cook, State of Illinois.

5. At all times pertinent, the Defendant, MANDY GITTLER, M.D., was a physician licensed to practice medicine in the State of Illinois and was practicing medicine as an actual or apparent agent of Defendant PLANNED PARENTHOOD OF ILLINOIS, or in the alternative, ALL WOMEN'S HEALTH, S.C.

6. At all times pertinent, the Defendant, MANDY GITTLER, M.D., was practicing medicine as an employee of Defendant, PLANNED PARENTHOOD OF ILLINOIS, or in the alternative, ALL WOMEN'S HEALTH, S.C.

7. At all times pertinent, the Defendant, PLANNED PARENTHOOD OF ILLINOIS through its agents or employees, including but not limited to physicians, nurses, physician assistants, nursing assistants, and other medical and administrative staff provided care and treatment of and to the Decedent, Tonya Reaves.

8. At all times pertinent, the Defendant, ALL WOMEN'S HEALTH, S.C., through its agents or employees, including but not limited to physicians, nurses, physician assistants,

nursing assistants, and other medical and administrative staff provided care and treatment of and to the Decedent, Tonya Reaves.

9. On and prior to July 20, 2012, Defendant PLANNED PARENTHOOD OF ILLINOIS employed personnel, including administrators, officers and directors, to investigate and determine the competence and experience of physicians, residents, nurses and other medical staff practicing at PLANNED PARENTHOOD OF ILLINOIS, as well as supervise the physicians, residents, nurses and other medical staff practicing at PLANNED PARENTHOOD OF ILLINOIS.

10. On and prior to July 20, 2012, Defendant ALL WOMEN'S HEALTH, S.C., employed personnel, including administrators, officers and directors, to investigate and determine the competence and experience of physicians, residents, nurses and other medical staff practicing at ALL WOMEN'S HEALTH, S.C., and at PLANNED PARENTHOOD OF ILLINOIS, as well as supervise the physicians, residents, nurses and other medical staff practicing at ALL WOMEN'S HEALTH and PLANNED PARENTHOOD OF ILLINOIS.

11. On or about July 20, 2012, TONYA REAVES was admitted to the Defendant, PLANNED PARENTHOOD OF ILLINOIS, for a procedure known as a dilation and evacuation.

12. During TONYA REAVES's admission on or about July 20, 2012, at the Defendant, PLANNED PARENTHOOD OF ILLINOIS, its agents and employees, including but not limited Mandy Gittler, M.D., provided care and treatment to TONYA REAVES before, during, and after several procedures that were performed, including but not limited to two dilation and evacuation procedures, among others.

13. During TONYA REAVES's admission on or about July 20, 2012, at the Defendant PLANNED PARENTHOOD OF ILLINOIS, the agents and employees of ALL

WOMEN'S HEALTH, S.C., including but not limited to Mandy Gittler, M.D., provided care and treatment to TONYA REAVES before, during and after several procedures that were performed, including but not limited to two dilation and evacuation procedures, among others.

14. During TONYA REAVES' admission to PLANNED PARENTHOOD OF ILLINOIS she had abnormal or excessive bleeding.

15. At all times pertinent, PLANNED PARENTHOOD OF ILLINOIS and ALL WOMEN'S HEALTH, S.C., through their agents, servants and employees including nurses, physicians, assistants, administrators and others, were under certain duties imposed by law.

16. At all times pertinent, MANDY GITTLER, M.D. was under certain duties imposed by law.

17. In breach of these duties, the Defendants, PLANNED PARENTHOOD OF ILLINOIS, through its agents and/or employees including but not limited to physicians, nurses, physician assistants, nursing assistants, and administrators, ALL WOMEN'S HEALTH, S.C., through its agents and/or employees including but not limited to physicians, nurses, physician assistants, nursing assistants, and administrators, and MANDY GITTLER, M.D., Individually and as an agent of PLANNED PARENTHOOD OF ILLINOIS and/or ALL WOMEN'S HEALTH, S.C., were negligent in one or more of the following:

- a. Failed to properly treat TONYA REAVES;
- b. Failed to diagnose the conditions of TONYA REAVES;
- c. Failed to provide proper and qualified care to TONYA REAVES;
- d. Failed to properly and timely care for TONYA REAVES and the complications she suffered during and after her procedures;
- e. Failed to properly monitor or inadequately monitored TONYA REAVES;

- f. Failed to provide, obtain, or request consultations;
- g. Failed to notify or properly notify those caring for the decedent of the decedent's condition;
- h. Failed to use, perform, or provide proper monitoring of the decedent;
- i. Failed to use or perform proper ultrasound during her procedures;
- j. Failed to issue or follow orders, policies, procedures, standards and regulations;
- k. Failed to order or perform timely and proper procedures, tests, or surgeries;
- l. Failed to timely or properly transfer the patient to another facility;
- m. Failed to seek an appropriate and skilled physician;
- n. Failed to properly supervise the procedures performed on the decedent and the post-procedure care or monitoring;
- o. Failed to properly evaluate the decedent;
- p. Perforated the uterus and/or uterine artery;
- q. Failed to identify, diagnose, and/or treat the source or cause of the bleeding;
- r. Failed to identify, diagnose and/or treat a perforation of the uterus and/or uterine artery;
- s. Improperly performed a dilation and evacuation.
- t. Carelessly and negligently managed, maintained, controlled, owned and operated said medical center or facility in such a manner to cause injury to the decedent;
- u. Failed to properly supervise the procedures, care and treatment of the decedent;
- v. Failed to supervise the physicians, nurses, residents, and other employees, agents or servants and medical care providers;

- w. Failed to properly manage the physicians, nurses, residents, and other employees, agents or servants and medical care providers;
- x. Failed to check and ensure that the staff, physicians, nurses, and others participating in the care and treatment of the decedent was competent and qualified;
- y. Failed to provide competent and capable medical care and services to the decedent.

18. As a direct and proximate result of one or more of the foregoing acts or omissions, TONYA REAVES died as a result of the negligence of the defendants, and each of them, leaving the following people as her next of kin:

- a. ALVIN JONES, III, a minor.

19. The next of kin as stated herein have been deprived of pecuniary benefits, including but not limited to money, goods and service, loss of society and have sustained grief, sorrow, and mental anguish which are recoverable under the Illinois Wrongful Death Act. 740 ILCS 180/0.01 et seq.

20. Counsel for the plaintiff has consulted and reviewed the facts of this case with a health care professional who counsel reasonably believes is knowledgeable in the relevant issues in this action. The affidavit of plaintiff's counsel is attached Exhibit "A". The report of the reviewing health care professional is attached Exhibit "B".

21. ALVIN JONES, JR., was appointed the Guardian of the Estate of ALVIN JONES, III, a minor, in the Circuit Court of Cook County, Probate Division on November 1, 2012, and he was further appointed the Administrator of the Estate of TONYA REAVES in the Circuit Court of Cook County, Probate Division on January 3, 2013.

WHEREFORE, Plaintiff prays that this Court enter judgment in his favor and against the Defendants, and each of them, in an amount in excess of \$50,000.00 plus costs.

**COUNT TWO - WRONGFUL DEATH**

**Northwestern Memorial Hospital, Northwestern Medical Faculty Foundation,  
Tacoma McKnight M.D & Jamie McGuire M.D.**

1. At all times pertinent, the Defendant, NORTHWESTERN MEMORIAL HOSPITAL, through its agents, servants, and employees, owned, operated, maintained, and controlled a certain hospital, where it made facilities available to persons in need of medical attention and surgical procedures.
2. At all times pertinent, the Defendant, NORTHWESTERN MEMORIAL HOSPITAL, was an Illinois corporation and was doing business in the County of Cook, State of Illinois.
3. At all times pertinent, the Defendant, NORTHWESTERN MEDICAL FACULTY FOUNDATION, through its agents, servants, and employees, provided medical care, treatment, and services to persons in need of medical attention and surgical procedures.
4. At all times pertinent, the Defendant, NORTHWESTERN MEDICAL FACULTY FOUNDATION, was an Illinois corporation and was doing business in the County of Cook, State of Illinois.
5. At all times pertinent, the Defendant TACOMA MCKNIGHT, M.D., was a physician licensed to practice medicine in the State of Illinois and was practicing medicine as an actual or apparent agent of NORTHWESTERN MEMORIAL HOSPITAL, or in the alternative, NORTHWESTERN MEDICAL FACULTY FOUNDATION.
6. At all times relevant the Defendant, TACOMA MCKNIGHT, M.D., was practicing medicine as an employee of Defendant, NORTHWESTERN MEMORIAL HOSPITAL, or in the alternative, NORTHWESTERN MEDICAL FACULTY FOUNDATION.



7. At all times pertinent, the Defendant, JAMIE MCGUIRE, M.D., was a physician licensed to practice medicine in the State of Illinois and was practicing medicine as an actual or apparent agent of NORTHWESTERN MEMORIAL HOSPITAL, or in the alternative, NORTHWESTERN MEDICAL FACULTY FOUNDATION.

8. At all times relevant the Defendant, JAMIE MCGUIRE, M.D., was practicing medicine as an employee of Defendant, NORTHWESTERN MEMORIAL HOSPITAL, or in the alternative, NORTHWESTERN MEDICAL FACULTY FOUNDATION.

10. At all times relevant the Defendant, NORTHWESTERN MEMORIAL HOSPITAL, through its agents or employees including but not limited to physicians, nurses, physician assistants, nursing assistants, and other medical and administrative staff provided care and treatment of and to the Decedent, Tonya Reaves.

11. On and prior to July 20, 2012, Defendant NORTHWESTERN MEMORIAL HOSPITAL employed personnel, including administrators, officers and directors, to investigate and determine the competence and experience of physicians, residents, nurses and other medical staff practicing at NORTHWESTERN MEMORIAL HOSPITAL, as well as supervise the physicians, residents, nurses and medical staff practicing at NORTHWESTERN MEMORIAL HOSPITAL.

12. At all times relevant the Defendant, NORTHWESTERN MEDICAL FACULTY FOUNDATION, through its agents or employees including but not limited to physicians, nurses, physician assistants, nursing assistants, and other medical and administrative staff provided care and treatment of and to the Decedent, Tonya Reaves.

13. On and prior to July 20, 2012, Defendant NORTHWESTERN MEDICAL FACULTY FOUNDATION employed personnel, including administrators, officers and

directors, to investigate and determine the competence and experience of its physicians, residents, nurses and other medical staff, as well as supervise the physicians, residents, nurses and medical staff practicing at NORTHWESTERN MEMORIAL HOSPITAL.

14. On or about July 20, 2012, TONYA REAVES was admitted to the Defendant, PLANNED PARENTHOOD OF ILLINOIS, for a procedure known as a dilation and evacuation.

15. During TONYA REAVES' admission to PLANNED PARENTHOOD OF ILLINOIS she had abnormal or excessive bleeding.

16. The decedent TONYA REAVES was transferred to the Defendant NORTHWESTERN MEMORIAL HOSPITAL for care and treatment of her conditions, including but not limited to, excessive bleeding.

17. During TONYA REAVES's admission to the Defendant, NORTHWESTERN MEMORIAL HOSPITAL, its agents and employees, including but not limited DR. TACOMA MCKNIGHT and DR. JAMIE MCGUIRE, residents, nurses, and medical and nursing staff, provided care and treatment to TONYA REAVES, including but not limited to performing a dilation and curettage and hysterectomy.

18. At all times pertinent, NORTHWESTERN MEMORIAL HOSPITAL and NORTHWESTERN MEDICAL FACULTY FOUNDATION, through their agents, servants and employees including nurses, physicians, assistants, administrators and others, were under certain duties imposed by law.

19. At all times pertinent, TACOMA MCKNIGHT, M.D. was under certain duties imposed by law.

20. At all times pertinent, JAMIE MCGUIRE, M.D. was under certain duties imposed by law.

21. In breach of these duties, the Defendants, NORTHWESTERN MEMORIAL HOSPITAL, through its agents and/or employees including but not limited to physicians, nurses, physician assistants, nursing assistants, and administrators, NORTHWESTERN MEDICAL FACULTY FOUNDATION, through its agents and/or employees including but not limited to physicians, nurses, physician assistants, nursing assistants, and administrators, TACOMA MCKNIGHT, M.D, and JAMIE MCGUIRE, M.D., were negligent in one or more of the following:

- a. Failed to properly treat TONYA REAVES;
- b. Failed to diagnose the conditions of TONYA REAVES;
- c. Failed to provide proper and qualified care to TONYA REAVES;
- d. Failed to properly and timely care for TONYA REAVES and the complications she suffered during and after her procedures;
- e. Failed to properly monitor or inadequately monitored TONYA REAVES;
- f. Failed to provide, obtain, or request consultations;
- g. Failed to notify or properly notify those caring for the decedent of the decedent's condition;
- h. Failed to use, perform, or provide proper monitoring of the decedent;
- i. Failed to identify, diagnose, and/or treat the source or cause of the bleeding;
- j. Failed to issue or follow orders, policies, procedures, standards and regulations;
- k. Failed to order or perform timely and proper procedures, tests, or surgeries;
- l. Failed to seek an appropriate and skilled physician;

- m. Failed to properly supervise the procedures performed on the decedent and the post-procedure care or monitoring;
- n. Failed to properly evaluate the decedent;
- o. Perforated the uterus and/or uterine artery;
- p. Failed to identify, diagnose and/or treat a perforation of the uterus and/or uterine artery;
- q. Failed to recognize or diagnose the fluid in the abdomen;
- r. Failed to diagnose, treat, or manage the source of the fluid in the abdomen;
- s. Carelessly and negligently managed, maintained, controlled, owned and operated said medical center or hospital in such a manner to cause injury to the decedent;
- t. Failed to properly supervise the procedures, care and treatment of the decedent;
- u. Failed to supervise the physicians, nurses, residents, and other employees, agents or servants and medical care providers;
- v. Failed to properly manage the physicians, nurses, residents, and other employees, agents or servants and medical care providers;
- w. Failed to check and ensure that the staff, physicians, nurses, and others participating in the care and treatment of the decedent was competent and qualified;
- x. Failed to provide competent and capable medical care and services to the decedent.

22. As a direct and proximate result of one or more of the foregoing acts or omissions, TONYA REAVES died as a result of the negligence of the defendants, and each of them, as previously stated leaving the following people as her next of kin:

- a. ALVIN JONES, III, a minor.

23. The next of kin as stated herein have been deprived of pecuniary benefits, including but not limited to money, goods and service, loss of society and have sustained grief, sorrow, and mental suffering which are recoverable under the Illinois Wrongful Death Act. 740 ILCS 180/0.01 et seq.

24. Counsel for the plaintiff has consulted and reviewed the facts of this case with a health care professional who counsel reasonably believes is knowledgeable in the relevant issues in this action including obstetric care. The affidavit of plaintiff's counsel is attached Exhibit "A". The report of the reviewing health care professional is attached Exhibit "B".

25. ALVIN JONES, JR., was appointed the Guardian of the Estate of ALVIN JONES, III, a minor, in the Circuit Court of Cook County, Probate Division on November 1, 2012, and he was further appointed the Administrator of the Estate of TONYA REAVES in the Circuit Court of Cook County, Probate Division on January 3, 2013.

WHEREFORE, Plaintiff prays that this Court enter judgment in his favor and against the Defendants, and each of them, in an amount in excess of \$50,000.00 plus costs.

**COUNT THREE - SURVIVAL**  
**Planned Parenthood of Illinois, All Women's Health, S.C. & Mandy Gittler, M.D.**

1- 21. Plaintiff realleges and incorporates by reference herein paragraphs 1-21 of Count One as if specifically pled herein.

22. As a direct and proximate result of one or more of these foregoing negligent acts and/or omissions by the Defendants, and each of them, TONYA REAVES, underwent painful, disfiguring, and disabling injuries which required medical care and expenses, all to her damage, prior to her death.

23. That at all times, aforementioned, there was in force and effect in the State of Illinois a statute commonly known as the Survival Act. 755 ILCS 5/27-6.

WHEREFORE, Plaintiff prays that this Court enter judgment in his favor and against the Defendants, and each of them, in an amount in excess of \$50,000.00 plus costs.

**COUNT FOUR - Survival**  
**Northwestern Memorial Hospital, Northwestern Medical Faculty Foundation,  
Tacoma McKnight M.D & Jamie McGuire M.D.**

1- 25. Plaintiff realleges and incorporates by reference herein paragraphs 1-25 of Count Two as if specifically pled herein.

26. As a direct and proximate result of one or more of these foregoing negligent acts and/or omissions by the Defendants, and each of them, TONYA REAVES, underwent painful, disfiguring, and disabling injuries which required medical care and expenses, all to her damage, prior to her death.

27. That at all times, aforementioned, there was in force and effect in the State of Illinois a statute commonly known as the Survival Act. 755 ILCS 5/27-6.

WHEREFORE, Plaintiff prays that this Court enter judgment in his favor and against the Defendants, and each of them, in an amount in excess of \$50,000.00 plus costs.

**COUNT FIVE – Family Expense Act**

1-21. Plaintiff realleges and incorporates by reference herein paragraphs 1-21 of Count One as if specifically plead herein.

22. - 47. Plaintiff realleges and incorporated by reference herein paragraphs 1-25 of Count Two as if specifically plead as paragraphs twenty-two through forty-seven herein.

47. As a direct and proximate result of one of the foregoing negligent acts and/or omissions by the defendants, the Plaintiff, ALVIN JONES JR, has incurred costs and expenses, and funeral expenses pursuant to the Family Expense Act, 750 ILCS 65-15, in the care and death of the Decedent.

WHEREFORE, Plaintiff prays that this Court enter judgment in his favor and against the Defendants, and each of them, in an amount in excess of \$50,000.00 plus costs.

Respectfully submitted,

By:   
Attorneys for Plaintiff

Stephen D. Phillips  
Jill M. Webb  
PHILLIPS LAW OFFICES  
161 N. Clark Street, Suite 4925  
Chicago, IL 60601  
(312) 346-4262  
#40082

CLERK OF THE CIRCUIT COURT - COOK COUNTY  
00084182 LHM-01 1/3/2013 4:02PM  
ATTY: 40082 015 ASSATAC  
AD DAMNUM: \$50,001.00  
CASE NO: 2013L000076 CALENDAR: C  
COURT DATE: 0/0/0000 12:00AM  
CASE TOTAL: \$337.00

Automation	\$15.00
Document Storage	\$15.00
Law Library	\$21.00
Arbitration	\$10.00
Base Filing Fee 6	\$240.00
Dispute Resolution	\$1.00
Court Services	\$25.00
Children Waiting Rm	\$10.00

CHECK NO: 9511  
CHECK AMOUNT:  
SUBSCRIPTION TOTAL:

\$337.00  
\$0.00  
\$337.00



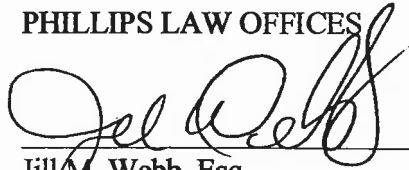
**AFFIDAVIT**

NOW COMES your Affiant, **Jill M. Webb**, pursuant to 735 ILCS 5/2-622, being first duly sworn on oath, deposes and states that if called to testify before this Court, he would be competent to do so and would testify as follows, all from his personal knowledge:

1. That he is associated with PHILLIPS LAW OFFICES, attorneys for Plaintiff herein, and is involved in the handling of this case.
2. That he has thoroughly reviewed the medical records and facts of this case.
3. That we have consulted and reviewed the facts of this case with a health care professional who the Affiant is informed and believes is qualified by experience and demonstrated competence, practices or has practiced within the last six years in the same area of health care that is at issue, is knowledgeable in the relevant issues involved in this particular action, is licensed to practice medicine in all its branches, and meets the expert witness standards set forth in Section 8-2501.
4. That said reviewing health care professional has, based on their review of the Plaintiff's medical records, other relevant material, and consultation with Affiant, determined in written reports attached hereto, that there is a reasonable and meritorious cause for the filing of the instant action as against each Defendant.
5. That your Affiant has concluded based on said consultation and on reviewing the health care professional's review, that there is a reasonable and meritorious cause for filing the instant action.

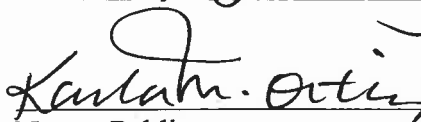
FURTHER, YOUR AFFIANT SAYETH NOT.

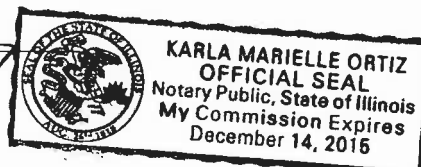
PHILLIPS LAW OFFICES

  
Jill M. Webb, Esq.

SUBSCRIBED and SWORN to before me

this 3 day of January, 2013.

  
Notary Public



[REDACTED]

**Jill M. Webb, Esq.**  
**PHILLIPS LAW OFFICES**  
**161 N. Clark Street, Suite 4925**  
**Chicago, Illinois 60601**

**Re: Tonya Reaves, deceased**

Dear Ms. Webb:

I am a physician who is board certified in Obstetrics/Gynecology and practice in that specialty. I am familiar with proper standards of care as they relate to termination of pregnancy procedures, including D & E, and D & C procedures and have performed hundreds of these procedures. I have reviewed the medical records of Tonya Reaves from Planned Parenthood and Northwestern Memorial Hospital. Based upon my review of the records, I am of the opinion that a reasonable and meritorious malpractice action exists against Planned Parenthood and Dr. M. Gittler, as well as Northwestern Memorial Hospital and the physicians or residents caring for her there, including, but not limited to Dr. Tacoma McKnight and Dr. Jamie McGuire.

It is my understanding that on July 20, 2012, Tonya Reaves presented to Planned Parenthood for a dilation and evacuation for abortion. Dr. M. Gittler performed the procedure, without the use of ultrasound guidance. After the procedure, the patient had abnormal or excessive bleeding, and another D and E was performed, again without ultrasound guidance. The staff and physicians at Planned Parenthood did not timely recognize that the patient needed to be transferred to a hospital for care and treatment, which resulted in a delay in her receiving care and treatment that she needed.

Ultimately the staff at Planned Parenthood called 911 and the patient was emergently transported to Northwestern Memorial Hospital. At Northwestern a dilation and curettage was performed, without resolution of patient's symptoms or diagnosis of source of the patient's bleeding. There was a delay in recognizing the continuing deterioration of the patient and eventually an emergency hysterectomy was performed, a code was called, but the patient did not survive.

The failure to use ultrasound guidance for each procedure at Planned Parenthood was a deviation from the standard of care. The failure to timely recognize the complications and conditions and the failure to promptly transfer the patient to Northwestern Memorial Hospital

were also separate deviations from the standard of care. The medical providers at both Planned Parenthood and Northwestern (staff physicians as well as Doctors McKnight and McGuire) failed to consider a uterine artery laceration or uterine perforation as part of the differential diagnosis, which was a deviation from the standard of care. The staff and physicians, as identified above, at Northwestern failed to recognize, diagnose and treat the source of the fluid in the abdomen, which was a deviation. The foregoing deviations delayed and prevented the patient from receiving a timely laparotomy. Had the foregoing deviations not occurred and had the patient received timely, proper treatment in my opinion this patient more than likely would have lived. It appears this patient's death was preventable and due to the foregoing deviations from the standards of care.

This report was not meant to be all-inclusive, and upon further review of any additional information or documents I may have additional opinions and I could expand on this if requested.

Very truly yours,



# AFFIDAVIT OF DAMAGES

## SUPREME COURT RULE 222

The undersigned being first duly sworn upon oath, deposes and states that she is the attorney for the plaintiff in the above entitled cause of action seeking money damages or collection of taxes and states that this cause of action

☐ does not exceed \$50,000.00

☒ does exceed \$50,000.00

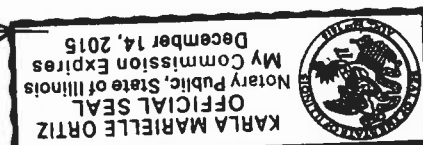
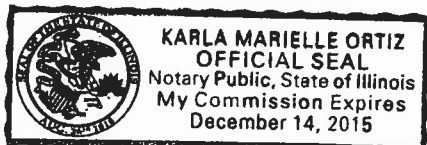
PHILLIPS LAW OFFICES

By:   
Attorney for Plaintiff

Subscribed and Sworn to before me

this 3<sup>rd</sup> day of January, 2013

  
Notary Public



IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

FILED-18

2013 JAN -3 PM 4:10

CIRCUIT COURT OF COOK  
COUNTY, ILLINOIS  
LAW DIVISION

DOROTHY F. FINE

MARTIN GORDON, and  
DENISE GORDON,

Plaintiffs,

v.

DANIEL CLARKE,

Defendant.

No.

2013L000077  
CALENDAR/ROOM D  
TIME 00:00  
PI Motor Vehicle

**AFFIDAVIT PURSUANT TO SUPREME COURT RULE 222(b)**

The undersigned, an attorney for the Plaintiffs, reasonably believes and hereby certifies  
that the damages for which Plaintiffs pray for in their Complaint exceed \$50,000.00.

Law Offices of Steven J. Seidman

By:                       
One of its attorneys

Atty. No. 70099  
Law Offices of Steven J. Seidman  
20 S. Clark St., Ste. 700  
Chicago, IL 60603  
(312) 781-1977

# LAW

## DIVISION



13-L-000076

JONES ALVIN JR

- VS -

PLANNED PARENTHOOD ILLINO  
C 40082  
MEDICAL MAL-PRACTICE

2013

1  
0  
0  
0  
0  
7  
6

### MISSION STATEMENT

Mission of the Office of the Clerk of the Circuit Court of Cook County is to serve the citizens of Cook County and the participants in the judicial system in a timely, efficient and ethical manner. Services, information and court records will be provided with courtesy and cost efficiency.

VS.

NOTICE: Any person who knowingly and without lawful authority, alters, destroys, defaces, removes or conceals any document, evidence or exhibit that is part of the official court record commits a felony (720 ILCS 5/32-8).

Clerk of the Circuit Court  
of Cook County

No Files to be taken out  
without leave of Court