



D57605064

STATE OF OHIO
COURT OF COMMON PLEAS
HAMILTON COUNTY
CIVIL DIVISION

CASE NO: A0400419

2000 JAN 16 A 8:45
FILED
GREGORY HARTMANN
CLERK OF COURTS
HAMILTON COUNTY, OH

LINDA HOGAN
1000 Perkins Road
Dry Ridge, KY 41035

Plaintiff

COMPLAINT WITH JURY DEMAND

vs.

MICHAEL R. DRAZNIK, M.D., INC.
2055 Reading Road, Ste. 480
Cincinnati, OH 45202

Defendant.

<input checked="" type="checkbox"/> ORIG. COMP PARTIES, SUMMONS
<input checked="" type="checkbox"/> CERT MAIL () SHERIFF () WAVE
<input type="checkbox"/> PROCESS SERVER () NONE
CLERKS FEES <u>445</u> TIC
SECURITY FOR COST _____
DEPOSITED BY <u>29997</u>
FILING CODE <u>A-345</u>

COMES NOW the Plaintiff, LINDA HOGAN, and for her Complaint against the Defendant, MICHAEL DRAZNIK, M.D. (hereinafter "Draznik") hereby states and avers as follows:

1. Plaintiff, LINDA HOGAN, is a resident and citizen of Grant County, Commonwealth of Kentucky, and resides at 1000 Perkins Road, Dry Ridge, Kentucky 41035.
2. Defendant, Draznik, was and is a duly licensed and practicing physician engaged in the practice of gynecological surgery in Hamilton County, Ohio.

COUNT I

3. On or about May 30, 2002, Plaintiff Hogan underwent laparoscopic surgery performed by Defendant Draznik in Ohio.

4. That Defendant Draznik did owe a duty to Plaintiff to exercise the same degree of care and skill expected of a reasonably competent physician in the same class, acting under similar circumstances.

5. That Defendant Draznik did negligently and carelessly perform the surgery described herein on Plaintiff Hogan. Such negligent and careless medical treatment rendered to the Plaintiff amounts to a departure from good and accepted medical standards and a violation of the duty owed to Plaintiff to exercise the degree of care and skill expected of a reasonably competent physician in the same class to which he belongs, acting under similar circumstances.

6. That as a direct and proximate result of the above negligence and carelessness of Defendant Draznik, the Plaintiff, Linda Hogan, has suffered serious injury for which she suffered loss of income in an amount to be proven at trial.

7. That as a further direct and proximate result of the above mentioned negligence and carelessness of Defendant Draznik, the Plaintiff, Linda Hogan, has suffered physical pain and mental anguish, all in an amount to be proven at trial.

8. That as a further direct and proximate result of the above mentioned negligence and carelessness of the Defendant Draznik, the Plaintiff Linda Hogan will suffer increased risk of future medical problems as a direct result of the negligent and carelessly performed surgery.

9. That as a further direct and proximate result of the above mentioned negligence and carelessness of Defendant Draznik, the Plaintiff, Linda Hogan, has incurred lost wages and economic loss, all in an amount to be proven at trial.

WHEREFORE, the Plaintiff, Linda Hogan, prays the Court as follows:

A. For judgment against the Defendant, Draznik, for damages in excess of \$25,000 Dollars:

B. For her costs expended herein, including reasonable attorney fees;

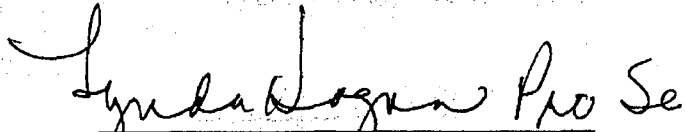
C. For pre-judgment and post-judgment interest;

D. For any and all other proper relief to which she may appear entitled;

and

E. For a trial by jury.

Respectfully submitted,



LINDA HOGAN, Pro Se

1000 Perkins Road

Dry Ridge, KY 41035

(Representing herself in Proper Person)

TO THE CLERK: Please issue a summons and serve it, along with a copy of the foregoing Complaint upon each Defendant at the address listed in the caption of the Complaint.