

DANIEL M. HERRIGAN

2013 MAR -4 PM 2: 25

SUMMIT COUNTY  
CLERK OF COURTS

**IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO**

**ARIEL M. KNIGHTS**  
2512 State Road, Apt 2  
Cuyahoga Falls, OH 44223

Plaintiff,

v.

**AKRON WOMEN'S MEDICAL  
GROUP c/o Carol Westfall**  
5 Severance Circle, Suite 611  
Cleveland Heights, OH 44118

and

**RAYMOND ROBINSON, M.D.**  
**c/o Akron Women's Medical Group**  
692 East Market Street  
Akron, OH 44304

and

**M.H. REZAEI, M.D.**  
38429 Lake Shore Boulevard  
Willoughby, OH 44094

Defendants.

CASE NO.:

2013. 03 1267

JUDGE:

AMY CORRIGALL JONES

COMPLAINT

**NOW COMES** Ariel Knights, Plaintiff in the above captioned case and for her

Complaint against the named Defendants states as follows:

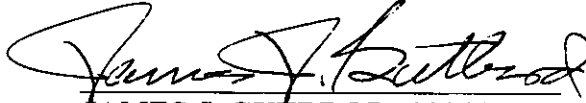
### **FIRST CLAIM FOR RELIEF**

1. At all relevant times, Defendants Raymond Robinson, M.D. and M.H. Rezaee, M.D. were physicians performing abortions at Defendant Akron Women's Medical Group.
2. On or about March 3, 2012, Plaintiff Ariel Knights presented herself for the performance of an abortion at Defendant Akron Women's Medical Group.
3. Defendants were negligent and deviated from the appropriate standard of care in performing the abortion.
4. On or about March 9, 2012, Plaintiff learned for the first time that the abortion was not accomplished and that she was still pregnant.
5. At that time Plaintiff was referred to another abortion clinic, but that abortion clinic was unwilling to become involved in "somebody else's mistake".
6. Plaintiff refused to submit herself to Defendants for another attempt at the abortion. She continued on with the pregnancy and ultimately the delivery of the child.
7. As a direct and proximate result of the negligence of the Defendants, Plaintiff sustained injury, harm and damage, including medical expenses, pain and suffering, emotional distress, loss of enjoyment of life, loss of income and other damages.

WHEREFORE, having set forth her Complaint, Plaintiff hereby demands judgment in her favor, and compensatory damages in an amount in excess of \$25,000, together with interest, costs, attorney fees and whatever other relief this Court deems proper.

Respectfully submitted,

**JAMES J. GUTBROD, ATTORNEY AT LAW**

A handwritten signature in black ink, appearing to read "James J. Gutbrod", written over a horizontal line.

**JAMES J. GUTBROD (0034414)**

*Attorney for Plaintiff*

4367 State Road

Akron, Ohio 44319

Telephone: (330) 475-1584

Fax: (330) 645-1970

E-mail: [jim@jgutbrod.com](mailto:jim@jgutbrod.com)