

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF MACOMB

DARLENE BELCASTRO,
Plaintiff,

vs.

Case No: 90-2267 CZ

DR. JACOB KALO,
Defendant

SCHWARTZ
PROFS

JESSE M. REITER (P40692)
Attorney for Plaintiff
24901 Northwestern Hwy., Ste. 417
Southfield, MI 48075
(313) 355-1727

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this complaint pending in this court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge, nor do I know of any other civil action, not between these parties, arising out of the same transaction or occurrence as alleged in this complaint. The matter previously filed and dismissed, transferred or otherwise disposed of after having been referred to a judge in this court. *Mail*

COMPLAINT

NOW COMES the above-named plaintiff, by her attorneys, TURNER & TURNER, P.C., and in complaining against the above named defendant, states as follows:

1. That the plaintiff is a resident of the City of Roseville, County of Macomb, State of Michigan.
2. That the defendant, Dr. Jacob Kalo, is doing business in the City of Warren, County of Macomb, State of Michigan.
3. That as part of the investigation it is required that the plaintiff obtains medical records from the defendant who treated the plaintiff for medical problems.
4. That in order to obtain a copy of said records, plaintiff executed a medical release authorization for the law firm of Turner & Turner, P.C., to review the records or to

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obtain copies of said records from the defendant, Dr. Jacob Kalo.

5. That the law firm of Turner & Turner, P.C., has requested the medical records from defendant personally on numerous occasions and that defendant has refused to furnish the medical records of plaintiff Darlene Belcastro.

6. That this refusal is in violation of the laws of the State of Michigan and that the plaintiff and others who request medical records from the defendant is entitled to immediate injunctive release and this plaintiff, on her own behalf, and behalf of others, hereby requests this Honorable Court to issue an order to show cause why an injunction should not be issued permanently restraining the defendant from keeping the plaintiff and/or her representatives from having access to the plaintiff's entire medical chart and also to enjoin the defendant from wrongfully refusing to supply medical records to others in the future.

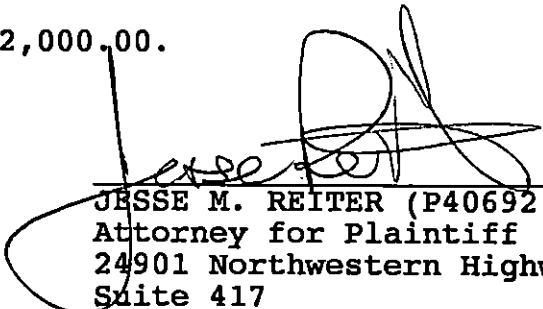
7. That the plaintiff further requests damages for having to bring this action, said action being the result of intentional wrong on the part of the defendant, inasmuch as the defendant knew or should have known by its wrongful refusal, court costs, and attorney fees would be incurred.

WHEREFORE, plaintiff prays that:

1. This Court issue an order to show cause to defendant Dr. Jacob Kalo;
2. That this Court enter an injunction on behalf of this plaintiff and also on behalf of any future

parties who may request medical records from this defendant; and

3. This Court grant to plaintiff's counsel damages in the amount of \$2,000.00.



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May 15, 1990