



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**New Case Electronically Filed:**  
**November 27, 2017 15:09**

By: JENNIFER L. LAWThER 0066761

Confirmation Nbr. 1234489

BRANDY M. HEDGE

CV 17 889549

vs.

PLANNED PARENTHOOD OF GREATER OHIO, ET  
AL.

**Judge:** MICHAEL P. SHAUGHNESSY

**Pages Filed:** 6

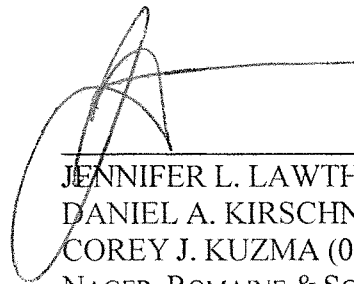
IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO

<b>BRANDY M. HEDGE</b>	)	<b>CASE NO.</b>
<b>3659 West 102<sup>nd</sup> Street</b>	)	
<b>Cleveland, OH 44111</b>	)	
	)	<b>JUDGE</b>
<b>Plaintiff-Appellant,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>PLANNED PARENTHOOD OF</b>	)	<b><u>NOTICE OF APPEAL</u></b>
<b>GREATER OHIO</b>	)	
<b>444 West Exchange Street</b>	)	
<b>Akron, OH 44302</b>	)	
	)	
<b>and</b>	)	
	)	
<b>SARAH MORRISON, Administrator</b>	)	<b>CLAIM NO. 15-852823</b>
<b>Bureau of Workers' Compensation,</b>	)	
<b>William Green Building</b>	)	
<b>30 West Spring Street</b>	)	
<b>Columbus, OH 43215</b>	)	
	)	
<b>Defendants-Appellees.</b>	)	

Now comes Plaintiff-Appellant, Brandy M. Hedge, and gives her Notice of Appeal, from the decision of the Staff Hearing Officer sitting on behalf of the Industrial Commission of Ohio mailed September 9, 2017 in Claim No. 15-852823, wherein Brandy M. Hedge is the claimant, Planned Parenthood of Greater Ohio is the employer, and Sarah Morrison is the Administrator of the Bureau of Workers' Compensation. Brandy M. Hedge does hereby appeal from said decision of the Industrial Commission of Ohio, pursuant to ORC 4123.512; as to which Industrial Commission decision said employee first received notice, that the Staff Hearing Officer by order mailed September 9, 2017 denied the employee's timely filed appeal therefrom, on September 11, 2017.

Further, that claimant exhausted her administrative appeals by filing an appeal from the Staff Hearing Officer's denial on September 21, 2017. By order mailed September 28, 2017 and received by claimant on October 2, 2017, the Industrial Commission refused to entertain the employee's timely filed appeal.

Respectfully submitted,



JENNIFER L. LAWThER (0066761)  
DANIEL A. KIRSCHNER (0086438)  
COREY J. KUZMA (0092958)  
NAGER, ROMAINE & SCHNEIBERG Co. L.P.A.  
27730 Euclid Avenue  
Cleveland, Ohio 44132  
jlawther@nrsinjurylaw.com  
dkirschner@nrsinjurylaw.com  
ckuzma@nrsinjurylaw.com  
(216) 289-4740  
(216) 289-4743 (fax)  
*Attorneys for Plaintiff-Appellant*  
*Brandy M. Hedge*

IN THE COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO

BRANDY M. HEDGE  
3659 West 102<sup>nd</sup> Street  
Cleveland, OH 44111

Plaintiff-Appellant,

v.

PLANNED PARENTHOOD OF  
GREATER OHIO  
444 West Exchange Street  
Akron, OH 44302

and

SARAH MORRISON, Administrator  
Bureau of Workers' Compensation,  
William Green Building  
30 West Spring Street  
Columbus, OH 43215

Defendants-Appellees.

) CASE NO.

) JUDGE:

) PETITION AND COMPLAINT ON  
) APPEAL  
) (Jury Demand Endorsed Hereon)

) CLAIM NO. 15-852823

Now comes Plaintiff-Appellant, Brandy M. Hedge by and through counsel, and for her

Petition states that:

1. Plaintiff-Appellant, Brandy M. Hedge (hereinafter "Plaintiff-Appellant") is a citizen and resident of the State of Ohio.

2. Employer-Appellee, Planned Parenthood of Greater Ohio (hereinafter "Defendant-Employer"), is an employer doing business in the State of Ohio and at all times mentioned herein was amenable to and had complied with the Workers' Compensation Act by paying into the State Insurance Fund and/or was a self-insured employer for the purposes of workers' compensation

coverage.

3. Appellee Sarah Morrison is the duly appointed administrator of the Bureau of Workers' Compensation, a government agency created and existing under the laws of the State of Ohio, for the purposes of administering the Workers' Compensation Act.

4. Plaintiff-Appellant comes before the court by appealing the order and decision of the Industrial Commission of Ohio mailed September 9, 2017 in Claim No. 15-852823.

5. At all times relevant to this claim, Plaintiff-Appellant was employed by Defendant-Employer, in Cuyahoga County, Ohio.

6. On or about October 23, 2015, Plaintiff-Appellant, while employed by Defendant-Employer, was injured at work.

7. As a direct and proximate result of the aforementioned incident, Plaintiff-Appellant suffered injuries to her back and neck.

8. Plaintiff-Appellant's injuries occurred in the course of and arose out of her employment with Defendant-Employer.

9. Ultimately, Plaintiff-Appellant filed an application for compensation for her injuries and her claim was allowed for contusion of lower back and pelvis; sprain of unspecified parts of lumbar spine and pelvis; strain of muscle and tendon of front wall of thorax; sprain of ligaments of cervical spine; strain of muscle, fascia and tendon at neck level; and strain of muscle, fascia and tendon of lower back.

10. On April 19, 2017, Plaintiff-Appellant filed a motion for the additional allowance of L4-5 circumferential disc bulge, contact and displacement with exiting right L4 nerve root.

11. By order mailed July 22, 2017, District Hearing Officer Brendan Morris denied the motion and disallowed the claim for substantial aggravation of L4-5 circumferential disc

bulge, contact and displacement with exiting right L4 nerve root.

12. Further, on or about August 4, 2017, Plaintiff-Appellant timely filed an appeal from the District Hearing Officer's order.

13. By order mailed September 9, 2017, Staff Hearing Officer Gary Bash affirmed the District Hearing Officer's order and disallowed the claim for substantial aggravation of L4-5 circumferential disc bulge, contact and displacement with exiting right L4 nerve root.

14. Plaintiff-Appellant timely filed an appeal to the Industrial Commission of Ohio on September 21, 2017.

15. Plaintiff-Appellant, by filing her appeal to the Industrial Commission of Ohio on September 21, 2017 exhausted her administrative appeals.

16. By order mailed September 28, 2017 and received by Plaintiff-Appellant on October 2, 2017, the Industrial Commission refused the Plaintiff-Appellant's appeal.

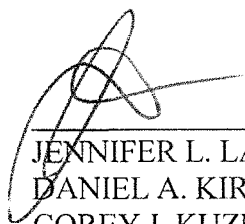
17. Thereafter, and within sixty (60) days from receipt of the final order of the Industrial Commission, Plaintiff-Appellant filed a Notice of Appeal with the Clerk of Court, Court of Common Pleas, for Cuyahoga County, Ohio.

18. Thereafter, and within thirty (30) days from the filing of the Notice of Appeal, Plaintiff-Appellant filed this Petition with the Clerk of Court, Court of Common Pleas, for Cuyahoga County, Ohio.

19. By reason of the above-described injury, Plaintiff-Appellant is entitled to receive benefits provided by the Workers' Compensation Act of Ohio for all her injuries.

WHEREFORE, Plaintiff-Appellant prays that judgment be rendered against Employer-Appellant, that she be allowed to participate in the State Insurance Fund, and that she be awarded attorney's fees, costs, and any other relief which this Court may deem equitable and necessary.

Respectfully submitted,

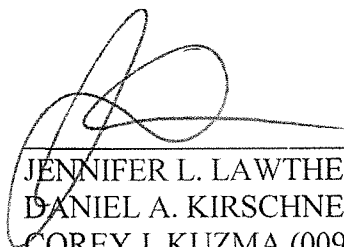


---

JENNIFER L. LAWTHER (0066761)  
DANIEL A. KIRSCHNER (0086438)  
COREY J. KUZMA (0092958)  
NAGER, ROMAINE & SCHNEIBERG CO. L.P.A.  
27730 Euclid Avenue  
Cleveland, Ohio 44132  
jlawther@nrsinjurylaw.com  
dkirschner@nrsinjurylaw.com  
ckuzma@nrsinjurylaw.com  
(216) 289-4740  
(216) 289-4743 (fax)  
*Attorneys for Plaintiff-Appellant*  
*Brandy M. Hedge*

### **JURY DEMAND**

A trial by jury is hereby demanded on all issues of the within action.



---

JENNIFER L. LAWTHER (0066761)  
DANIEL A. KIRSCHNER (0086438)  
COREY J. KUZMA (0092958)  
NAGER, ROMAINE & SCHNEIBERG CO. L.P.A.  
*Attorneys for Plaintiff-Appellant*  
*Brandy M. Hedge*