

IN THE CIRCUIT COURT OF THE  
EIGHTEENTH JUDICIAL CIRCUIT IN AND  
FOR SEMINOLE COUNTY, FLORIDA.

JESSICA TAYLOR,  
Plaintiff,

Case No.:

12CA10-09-K

vs.

ALL WOMEN'S HEALTH CENTER OF  
ORLANDO, INC.; JOSE R. QUINTANA,  
M.D., individually and/or as an agent of  
ALL WOMEN'S HEALTH CENTER OF  
ORLANDO, INC.; CRYSTAL ADAMS,  
individually and/or as an agent of ALL  
WOMEN'S HEALTH CENTER OF  
ORLANDO, INC.; STEPHANIE CABA,  
individually and/or as an agent of ALL  
WOMEN'S HEALTH CENTER OF  
ORLANDO, INC.; EVELYN CINTRON,  
individually and/or as an agent of ALL  
WOMEN'S HEALTH CENTER OF  
ORLANDO, INC.,

Defendants.

UNOFFICIAL  
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OF CLERK  
MARYANNE MORSE  
CLERK  
MAY 11 11:41  
2012  
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**PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS TO DEFENDANTS, ALL  
WOMEN'S HEALTH CENTER OF ORLANDO, INC., CRYSTAL ADAMS, STEPHANIE  
CABA, AND EVELYN CINTRON**

COMES NOW, Plaintiff, JESSICA TAYLOR, by and through her undersigned  
counsel, and pursuant to Rule 1.370, Florida Rules of Civil Procedure, requests the  
Defendants, ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC., CRYSTAL  
ADAMS, STEPHANIE CABA, and EVELYN CINTRON, to admit, in this action, that each  
of the following statements are true:

1. At all times material hereto, JOSE R. QUINTANA, M.D. was an employee  
of ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC.

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2. At all times material hereto, JOSE R. QUINTANA, M.D. was an agent of ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC.

3. At all times material hereto, CRYSTAL ADAMS, EVELYN CINTRON, AND STEPHANIE CABA, were medical assistants employed by ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC.

4. On August 12, 2010, JESSICA TAYLOR sought and received medical treatment to terminate her pregnancy from JOSE R. QUINTANA, M.D. and ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC., through its employees and/or agents.

5. JOSE R. QUINTANA, M. D. perforated the uterus of JESSICA TAYLOR during the procedure performed on August 12, 2010.

6. JOSE R. QUINTANA, M.D. perforated the bowel/intestine of JESSICA TAYLOR during the procedure performed on August 12, 2010.

7. JOSE R. QUINTANA, M.D. failed to successfully remove all of the products of conception from JESSICA TAYLOR during the procedure performed on August 12, 2010.

8. JESSICA TAYLOR was sent home on August 12, 2010 with products of conception, to include the fetal skull, still inside her body.

9. At no time following the procedure on August 12, 2010 did JOSE R. QUINTANA, M.D. or ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC., through its employees and/or agents transfer JESSICA TAYLOR to the hospital, call an ambulance or recommend emergency treatment.

10. JESSICA TAYLOR returned to ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC. on August 13, 2010 complaining of abdominal pain.

11. Defendants did not transfer JESSICA TAYLOR to the hospital, call an ambulance or recommend emergency treatment on August 13, 2010.

12. On August 13, 2010, a second procedure was performed but products of conception, including the fetal skull, were never removed and/or were caused to remain inside JESSICA TAYLOR'S body.

13. On August 13, 2010, neither ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC. nor JOSE R. QUINTANA, M.D. transferred JESSICA TAYLOR to the hospital, called an ambulance or recommend emergency treatment.

14. On August 14, 2010, JESSICA TAYLOR complained that she had pain in her lower abdomen and had not had a bowel movement.

15. On August 14, 2010, neither JOSE R. QUINTANA, M.D. nor ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC. advised JESSICA TAYLOR to seek additional treatment or to go to the hospital.

16. On August 15, 2010, JESSICA TAYLOR was admitted to Winnie Palmer Hospital in Orlando and was diagnosed with septic shock, respiratory insufficiency, hypovolemic shock, acute renal failure, sepsis and peritonitis along with a perforated intestine and uterus.

17. On August 15, 2010, JESSICA TAYLOR underwent surgery which revealed a large fundal uterine perforation, an ischemic bowel along with a fetal skull in the pelvis.

18. ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC., by and through its employees and/or agents, deviated from the prevailing standard of care with respect to their care and treatment of JESSICA TAYLOR.

19. JOSE R. QUINTANA, M.D. deviated from the prevailing standard of care with respect to his care and treatment of JESSICA TAYLOR.

20. CRYSTAL ADAMS, EVELYN CINTRON, AND STEPHANIE CABA were negligent with respect to their care and treatment of JESSICA TAYLOR.

21. As a direct result of the negligence of ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC., JESSICA TAYLOR required additional medical treatment and suffered bodily injury resulting in pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, loss of earning capacity, expenses of hospitalization and medical and nursing care and treatment.

22. As a direct result of the negligence of JOSE R. QUINTANA, M.D., JESSICA TAYLOR required additional medical treatment and suffered bodily injury resulting in pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, loss of earning capacity, expenses of hospitalization and medical and nursing care and treatment.

23. ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC. was aware, or should have been aware, of JOSE R. QUINTANA, M.D.'s unfitness for reasons including but not limited to his prior disciplinary history.

24. ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC. failed to fully investigate JOSE R. QUINTANA, M.D. prior to retaining him and/or retaining his services despite knowledge of his unfitness to practice.

25. JOSE R. QUINTANA, M.D. had a duty to inform JESSICA TAYLOR of all the risks and hazards of the dilation and curettage procedure along with the alternative procedures or treatments.

26. JOSE R. QUINTANA, M.D. failed to inform JESSICA TAYLOR of all the risks and hazards of the dilation and curettage procedure along with the alternative procedures or treatments.

27. Any consent obtained from JESSICA TAYLOR was not in accordance with the accepted medical practice among members of the medical profession with similar training and experience in the same or similar medical community.

28. A reasonable person would not have had an understanding of the medically acceptable alternative procedures and treatments and the substantial risks and hazards of the dilatation and curettage procedure based on the information, if any, provided by JOSE R. QUINTANA, M.D. and ALL WOMEN'S HEALTH CENTER OF ORLANDO, INC, to JESSICA TAYLOR.

29. JESSICA TAYLOR would not have undergone the procedure on April 12, 2010 had she been informed of all the risks and the alternative procedures and treatments available to her.

30. As a direct result of the failure of JOSE R. QUINTANA, M.D. to obtain informed consent, JESSICA TAYLOR, required additional medical treatment and suffered bodily injury resulting in pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, loss of earning capacity, expenses of hospitalization and medical and nursing care and treatment.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail or hand delivery on the same date and together with the Summons and Complaint.



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