

SECOND JUDICIAL DISTRICT COURT
COUNTY OF BERNALILLO
STATE OF NEW MEXICO

FILED
SECOND JUDICIAL DISTRICT
99 MAR 11 PM 2:26

DEAN DUNSWORTH

VIRGEN VASQUEZ,

Summons (es) Issued

Thomas J. Ringe

Plaintiff,

CV- '99 002361

vs.

CV No. _____

DIBÉ MARTIN, M.D., MARK GENESEN, M.D.,
JULIE K. VAN SOMEREN, M.D., KIMBERLY
VAN SCRIVER, M.D., ANGELA CHIEN, M.D.,
JOHN DOES, M.D. and THE REGENTS OF THE
UNIVERSITY OF NEW MEXICO, d/b/a UNIVERSITY
HOSPITAL,

Defendants.

COMPLAINT FOR INJURIES AND DAMAGES

COMES NOW, the Plaintiff, Virgen Vasquez, by and through her counsel of record, Dennis W. Montoya, and complaining of the Defendants states as follows:

1. Plaintiff Virgen Vasquez, at all times relevant to this Complaint, was a resident of the City of Albuquerque, County of Bernalillo, State of New Mexico.
2. The events giving rise to this litigation occurred at University Hospital, within the territorial limits of the City of Albuquerque, County of Bernalillo, State of New Mexico, and within the Second Judicial District for the State of New Mexico.
3. Jurisdiction and venue in this matter lie with the Second Judicial District Court, State of New Mexico.
4. On March 27, 1997, Plaintiff Virgen Vasquez was, or became, a patient of the above-named Defendants and underwent a surgical cesarian section procedure at University Hospital.

5. In the course of the surgical procedure, Defendants cut or otherwise compromised Plaintiff's ureter and during subsequent recovery and prolonged treatment, Defendants failed to timely identify and adequately repair the injury to the ureter, with the result that Plaintiff became increasingly ill and suffered extensive internal damage.

6. Defendants failed to possess and apply the knowledge and use the care and skill of reasonably well qualified surgeons and physicians, giving due regard to the Defendants' locality, and as a direct and proximate result of the breach of standard of care by Defendants, Plaintiff suffered permanent injuries and damages.

WHEREFORE, Plaintiff prays for judgment against the Defendants, in an amount that will compensate her, plus the costs of this action and any other relief the Court deems fair and just.



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