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IN THE CIRCUIT COURT OF FLORIDA, EIGHTH JUDICIAL CIRCUIT

IN AND FOR ALACHUA COUNTY

CIVIL ACTION

Steve Scofield, individually and as
parent and natural guardian of
Jessica I. Scofield, a minor, and
Jessica I. Scofield, individually,

Plaintiffs,

-vs-

PAUL SIBLEY, M.D., and ALL
WOMEN'S HEALTH CENTER
OF GAINESVILLE, INC., a Florida
Corporation,

Defendants.

CASE NO.: 01-01-CA 3285

DIVISION: K

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CLERK OF DISTRICT COURT
& COUNTY COURT
ALACHUA COUNTY, FL

FILED

COMPLAINT

COUNT ONE

The Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, a minor, sues the Defendant, Paul Sibley, M.D., and says:

1. This is an action for damages that exceed the sum of \$25,000.00.
2. At all times material hereto, the Plaintiff, Steve Scofield, was and is the father and natural guardian of Jessica I. Scofield, a minor.
3. At all times material hereto, Plaintiff's daughter, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

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4. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting individually, and performed all acts alleged herein, in Gainesville, Alachua County, Florida.

5. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

6. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the said, Jessica I. Scofield, and that Plaintiff was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

7. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., negligently performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

8. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

9. Prior to performing said abortion procedure, the Defendant, Paul Sibley, M.D., was under a duty to contact and advise Plaintiff, Steve Scofield, that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

10. Prior to performing said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., negligently failed to contact, or failed to attempt to contact, the father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

11. As a direct result of said negligence, the Defendant, Paul Sibley, M.D., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff, Steve Scofield, from exercising his parental rights and duties of raising, protecting, counseling with, and providing parental and spiritual guidance to his minor child, Jessica I. Scofield, during her minority.

12. As a direct result of said negligence, Defendant Sibley deprived the Plaintiff, Steve Scofield, of any and all opportunity he may have had to provide love, protection, counseling, and guidance to his minor child, and to experience the family relationship and companionship with his grand child, who would have been born, but for the negligence of the defendant Sibley.

13. As a direct result of said negligence, Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, and Jessica I. Scofield, a minor, have been caused to suffer mental pain and anguish, emotional distress, inconvenience, and medical expenses, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Steve Scofield, demands judgment for compensatory damages against the Defendant, Paul Sibley, M.D., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT TWO

The Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, a minor, sues the Defendant, Paul Sibley, M.D., and says:

14. This is an action for damages that exceed the sum of \$25,000.00.

15. At all times material hereto, the Plaintiff, Steve Scofield, was and is the father and natural guardian of Jessica I. Scofield, a minor.

16. At all times material hereto, Plaintiff's daughter, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

17. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting individually, and performed all acts alleged herein, in Gainesville, Alachua County, Florida.

18. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

19. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the said minor, Jessica I. Scofield, and that Plaintiff was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

20. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knowingly, willfully, and intentionally performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

21. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

22. Prior to performing said abortion procedure, the Defendant, Paul Sibley, M.D., was under a duty to contact and advise Plaintiff, Steve Scofield, that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

23. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., knowingly, willfully, and intentionally failed to contact, or failed to attempt to contact, the father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

24. Said omissions were done for the purpose of intentionally hiding from the Steve Scofield, Defendant's intent to perform an unauthorized abortion procedure on Plaintiff's minor child.

25. As a direct result of said willful, wanton, and intentional acts or omissions, the Defendant, Paul Sibley, M.D., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff, Steve Scofield, from exercising his parental rights and duties of raising, protecting, counseling with, and providing parental and spiritual guidance to his minor child, Jessica I. Scofield, during her minority.

26. As a direct result of said willful, wanton, and intentional acts or omissions, Defendant Sibley deprived the Plaintiff, Steve Scofield, of any and all opportunity he may have had to provide love, protection, counseling and guidance to his minor child, and to

experience the family relationship with and companionship of his grand child, who would have been born, but for the wilful, wanton and intentional acts or omissions of defendant Sibley.

27. As a direct result of said negligence, Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, and Jessica I. Scofield, a minor, have been caused to suffer mental pain and anguish, emotional distress, inconvenience, and medical expenses, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Steve Scofield, demands judgment for compensatory damages against the Defendant, Paul Sibley, M.D., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT THREE

The Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, a minor, sues the Defendant, Paul Sibley, M.D., and says:

28 This is an action for damages that exceed the sum of \$25,000.00.

29. At all times material hereto, the Plaintiff, Steve Scofield, was and is the father and natural guardian of Jessica I. Scofield, a minor.

30. At all times material hereto, Plaintiff's daughter, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

31. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting individually, and performed all acts alleged herein, in Gainesville, Alachua County, Florida.

32. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have

legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

33. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the said Jessica I. Scofield, and that Plaintiff was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

34. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knowingly, willfully, and intentionally performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

35. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

36. Prior to performing said abortion procedure, the Defendant, Paul Sibley, M.D., was under a duty to contact and advise Plaintiff, Steve Scofield, that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

37. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., knowingly, willfully, and intentionally failed to contact, or failed to even attempt to contact, the father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

38. Said omissions were done for the purpose of intentionally hiding from the Steve Scofield, Defendant's intent to perform an unauthorized abortion procedure on Plaintiff's minor child.

39. As a direct result of said intentional acts or omissions, the Defendant, Paul Sibley, M.D., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff, Steve Scofield, from exercising his parental rights and duties of raising, protecting, counseling with, and providing parental and spiritual guidance to his minor child, Jessica I. Scofield, during her minority.

40. As a direct result of said intentional acts or omissions, Defendant Sibley deprived the Plaintiff, Steve Scofield, of any and all opportunity he may have had to provide love and guidance, and to experience the family relationship with and companionship of his grand child.

41. As a direct result of said intentional acts or omissions, Defendant Sibley committed a sexual battery on Plaintiff's minor child, Jessica I. Scofield.

42. As a direct result of said willful, wanton and intentional acts and omissions, Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, and Jessica I. Scofield, a minor, have been caused to suffer mental pain and anguish, emotional distress, inconvenience, and medical expenses, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Steve Scofield, demands judgment for punitive damages against the Defendant, Paul Sibley, M.D., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT FOUR

The Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, a minor, sues the Defendant, All Women's Health Center of Gainesville, Inc., and says:

43. This is an action for damages that exceed the sum of \$25,000.00.

44. At all times material hereto, the Plaintiff, Steve Scofield, was and is the father and natural guardian of Jessica I. Scofield, a minor.

45. At all times material hereto, Plaintiff's daughter, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

46. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting as an employee or authorized agent for All Women's Health Center of Gainesville, Inc., and performed all acts alleged herein, at the facilities of All Women's Health Center of Gainesville, Inc., located at 1135 N.W. 23rd Avenue, in Gainesville, Alachua County, Florida.

47. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

48. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the said Jessica I. Scofield, and that Plaintiff was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

49. On or about September 30, 1997, the Defendant, All Women's Health Center of Gainesville, Inc., by and through its employee or authorized agent Paul Sibley, M.D., negligently performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

50. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

51. Prior to performing the said abortion procedure, the Defendant, All Women's Health Center of Gainesville, Inc., was under a duty to contact and advise Plaintiff, Steve Scofield, that Jessica I. Scofield was consulting with Paul Sibley, M.D., concerning the possibility of having an abortion performed by, at the facilities of All Women's Health Center, Inc.

52. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, All Women's Health Center of Gainesville, Inc., negligently failed to contact, or failed to even attempt to contact, the father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

53. As a direct result of said negligence, the Defendant, All Women's Health Center of Gainesville, Inc., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff, Steve Scofield, from exercising his parental rights and duties of raising, protecting, counseling with, and providing parental and spiritual guidance to his minor child, Jessica I. Scofield, during her minority.

54. As a direct result of said negligence, the Defendant , All Women's Health Center of Gainesville, Inc., deprived the Plaintiff, Steve Scofield, of any and all opportunity he may have had to provide love and guidance, and to experience the family relationship with and companionship of his grand child.

55. As a direct result of said intentional acts or omissions, Defendant Sibley committed a sexual battery on Plaintiff's minor child, Jessica I. Scofield.

56. As a direct result of said negligence, Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, and Jessica I. Scofield, a minor, have been caused to suffer mental pain and anguish, emotional distress, inconvenience, and medical expenses, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Steve Scofield, demands judgment for compensatory damages against the Defendant, All Women's Health Center of Gainesville, Inc., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT FIVE

The Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, a minor, sues the Defendant, All Women's Health Center of Gainesville, Inc., and says:

57. This is an action for damages that exceed the sum of \$25,000.00.

58. At all times material hereto, the Plaintiff, Steve Scofield, was and is the father and natural guardian of Jessica I. Scofield, a minor.

59. At all times material hereto, Plaintiff's daughter, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

60. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting as an employee or authorized agent for All Women's Health Center of Gainesville, Inc., and performed all acts alleged herein, at the facilities of All Women's Health Center of Gainesville, Inc., located at 1135 N.W. 23rd Avenue, in Gainesville, Alachua County, Florida.

61. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

62. On or about September 30, 1997, the Defendant, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the said Jessica I. Scofield, and that Plaintiff was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

63. On or about September 30, 1997, the Defendant, All Women's Health Center of Gainesville, Inc., by and through its employee or authorized agent Paul Sibley, M.D., knowingly, willfully, and intentionally performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

64. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

65. Prior to performing the said abortion procedure, the Defendant, All Women's Health Center of Gainesville, Inc., was under a duty to contact and advise Plaintiff, Steve Scofield, that Jessica I. Scofield was consulting with Paul Sibley, M.D., concerning the possibility of having an abortion performed by, at the facilities of All Women's Health Center, Inc.

66. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, All Women's Health Center of Gainesville, Inc., knowingly, willfully, and intentionally failed to contact, or failed to even attempt to contact, the father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

67. As a direct result of said intentional omission, the Defendant, All Women's Health Center of Gainesville, Inc., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff, Steve Scofield, from exercising his parental rights and duties of raising, protecting, counseling with, and providing parental and spiritual guidance to his minor child, Jessica I. Scofield, during her minority.

68. As a direct result of said intentional omission, the Defendant, All Women's Health Center of Gainesville, Inc., deprived the Plaintiff, Steve Scofield, of any and all opportunity he may have had to provide love and guidance, and to experience the family relationship with and companionship of his grand child.

69. As a direct result of said intentional acts or omissions, Defendant Sibley committed a sexual battery on Plaintiff's minor child, Jessica I. Scofield.

70. As a direct result of said willful, wanton and intentional acts and omissions, Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, and Jessica I. Scofield, a minor, have been caused to suffer mental pain and anguish, emotional distress, inconvenience, and medical expenses, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Steve Scofield, demands judgment for compensatory damages against the Defendant, All Women's Health Center of Gainesville, Inc., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT SIX

The Plaintiff, Steve Scofield, individually, and as parent and natural guardian of Jessica I. Scofield, a minor, sues the Defendant, All Women's Health Center of Gainesville, Inc., and says:

71. This is an action for damages that exceed the sum of \$25,000.00.

72. At all times material hereto, the Plaintiff, Steve Scofield, was and is the father and natural guardian of Jessica I. Scofield, a minor.

73. At all times material hereto, Plaintiff's daughter, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

74. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting as an employee or authorized agent for All Women's Health Center of Gainesville, Inc., and performed all acts alleged herein, at the facilities of All Women's Health Center of Gainesville, Inc., located at 1135 N.W. 23rd Avenue, in Gainesville, Alachua County, Florida.

75. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

76. On or about September 30, 1997, the Defendant, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the said Jessica I. Scofield, and that Plaintiff was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

77. On or about September 30, 1997, the Defendant, All Women's Health Center of Gainesville, Inc., by and through its employee or authorized agent Paul Sibley, M.D., knowingly, willfully, and intentionally performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

78. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

79. Prior to performing the said abortion procedure, the Defendant, All Women's Health Center of Gainesville, Inc., was under a duty to contact and advise Plaintiff, Steve Scofield, that Jessica I. Scofield was consulting with Paul Sibley, M.D., concerning the possibility of having an abortion performed by, at the facilities of All Women's Health Center, Inc.

80. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, All Women's Health Center of Gainesville, Inc., knowingly, willfully, and intentionally failed to contact, or failed to even attempt to contact, the father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

81. As a direct result of said intentional omission, the Defendant, All Women's Health Center of Gainesville, Inc., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff, Steve Scofield, from exercising his parental rights and duties of raising, protecting, counseling with, and providing parental and spiritual guidance to his minor child, Jessica I. Scofield, during her minority.

82. As a direct result of said intentional omission, the Defendant, All Women's Health Center of Gainesville, Inc., deprived the Plaintiff, Steve Scofield, of any and all opportunity he may have had to provide love and guidance, and to experience the family relationship with and companionship of his grand child.

83. As a direct result of said intentional acts or omissions, Defendant Sibley committed a sexual battery on Plaintiff's minor child, Jessica I. Scofield.

WHEREFORE, the Plaintiff, Steve Scofield, demands judgment for punitive damages against the Defendant, All Women's Health Center of Gainesville, Inc., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT SEVEN

The Plaintiff, Jessica I. Scofield, individually, sues the Defendant, Paul Sibley, M.D., and says:

84. This is an action for damages that exceed the sum of \$25,000.00.

85. At all times material to the acts and omissions of the Defendant alleged herein, the Plaintiff, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

86. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting individually, and performed all acts alleged herein, in Gainesville, Alachua County, Florida.

87. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

88. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, with the exercise of due care, that Jessica I. Scofield was a minor child, and that she did not have the maturity or mental capacity to exercise good judgment in stressful, life altering matters, such as whether to obtain and abortion, or not, or to adopt the child she carried.

89. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, through the use of due care, that Plaintiff's father, Steve Scofield, was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide psychological and spiritual guidance to Jessica I. Scofield, during her years of minority.

90. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., negligently performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

91. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

92. Prior to performing the said abortion procedure, the Defendant, Paul Sibley, M.D., was under a duty to contact Plaintiff's father, Steve Scofield, and advise him that Jessica I. Scofield was consulting with Defendants, Paul Sibley, M.D., and All Women's Health Center of Gainesville, Inc., concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

93. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., negligently failed to contact, or failed to even attempt to contact Plaintiff's father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

94. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., negligently failed to counsel with and to fully disclose to Jessica I. Scofield all of the options available to Plaintiff concern her pregnancy, other than abortion.

95. As a direct result of said negligence , the Defendant, Paul Sibley, M.D., breached said duty, and caused damage to Plaintiff by interfering with, and effectively preventing her from obtaining proper psychological and spiritual guidance, counseling and protection from her father and natural guardian, Steve Scofield.

96. As a direct result of said negligence , the Defendant, Paul Sibley, M.D., caused damage to Plaintiff by withholding vital information concerning alternatives methods of proceeding in regard to her pregnancy, rather than abortion, thereby depriving Plaintiff of a factual basis for making a reasonable, rational and fully informed decision concerning a life altering situation.

97. As a direct result of said negligence, the Plaintiff, Jessica I. Scofield, has been caused to sustain physical trauma, mental anguish, and emotional distress due to said abortion, and has been permanently deprived of her child, which would have been born, but for the negligence of the defendant, Paul Sibley.

98. As a direct result of said negligence, Defendant Sibley committed a sexual battery on Plaintiff, Jessica I. Scofield, while she was a minor child.

99. As a direct result of said negligence, Plaintiff, Jessica I. Scofield, has been caused to suffer mental pain and anguish, emotional distress, inconvenience, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Jessica I. Scofield, demands judgment for compensatory damages against the Defendant, Paul Sibley, M.D., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT EIGHT

The Plaintiff, Jessica I. Scofield, individually, sues the Defendant, Paul Sibley, M.D., and says:

100. This is an action for damages that exceed the sum of \$25,000.00.

101. At all times material to the acts and omissions of the Defendant alleged herein, the Plaintiff, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

102. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting individually, and performed all acts alleged herein, in Gainesville, Alachua County, Florida.

103. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

104. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, with the exercise of due care, that Jessica I. Scofield was a minor child, and that she did not have the maturity or mental capacity to exercise good judgment in stressful, life altering matters, such as whether to obtain and abortion, or not, or to adopt the child she carried.

105. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, through the use of due care, that Plaintiff's father, Steve Scofield, was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide psychological and spiritual guidance to Jessica I. Scofield, during her years of minority.

106. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., willfully, wantonly, and intentionally performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

107. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

108. Prior to performing the said abortion procedure, the Defendant, Paul Sibley, M.D., was under a duty to contact Plaintiff's father, Steve Scofield, and advise him that Jessica I. Scofield was consulting with Defendants, Paul Sibley, M.D., and All Women's Health Center of Gainesville, Inc., concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

109. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., willfully, wantonly and intentionally failed to contact, or failed to even attempt to contact Plaintiff's father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

110. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., willfully, wantonly and intentionally failed to counsel with and to fully disclose to Jessica I. Scofield all of the options available to Plaintiff concern her pregnancy, other than abortion.

111. As a direct result of said willful, wanton and intentional acts and omissions , the Defendant, Paul Sibley, M.D., breached said duty, and caused damage to Plaintiff by interfering with, and effectively preventing her from obtaining proper psychological and spiritual guidance, counseling and protection from her father and natural guardian, Steve Scofield.

112. As a direct result of said willful, wanton and intentional acts and omissions , the Defendant, Paul Sibley, M.D., caused damage to Plaintiff by withholding vital information concerning alternatives methods of proceeding in regard to her pregnancy, rather than abortion, thereby depriving Plaintiff of a factual basis for making a reasonable, rational and fully informed decision concerning a life altering situation.

113. As a direct result of said willful, wanton and intentional acts and omissions, the Plaintiff, Jessica I. Scofield, has been caused to sustain physical trauma, mental anguish, and emotional distress due to said abortion, and has been permanently deprived of her child, which would have been born, but for the willful, wanton and intentional acts and omissions of the defendant, Paul Sibley.

114. As a direct result of said negligence, Defendant Sibley committed a sexual battery on Plaintiff, Jessica I. Scofield, while she was a minor child.

115. As a direct result of said negligence, Plaintiff, Jessica I. Scofield, has been caused to suffer mental pain and anguish, emotional distress, inconvenience, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Jessica I. Scofield, demands judgment for compensatory damages against the Defendant, Paul Sibley, M.D., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT NINE

The Plaintiff, Jessica I. Scofield, individually, sues the Defendant, Paul Sibley, M.D., and says:

116. This is an action for damages that exceed the sum of \$25,000.00.

117. At all times material to the acts and omissions of the Defendant alleged herein, the Plaintiff, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

118. At all times material hereto, the Defendant, Paul Sibley, M.D., was acting individually, and performed all acts alleged herein, in Gainesville, Alachua County, Florida.

119. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known that Jessica I. Scofield was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

120. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, with the exercise of due care, that Jessica I. Scofield was a minor child, and that she did not have the maturity or mental capacity to exercise good judgment in stressful, life altering matters, such as whether to obtain and abortion, or not, or to adopt the child she carried.

121. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., knew or should have known, through the use of due care, that Plaintiff's father, Steve Scofield, was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide psychological and spiritual guidance to Jessica I. Scofield, during her years of minority.

122. On or about September 30, 1997, the Defendant, Paul Sibley, M.D., willfully, wantonly, and intentionally performed an unauthorized abortion procedure on the said Jessica I. Scofield, a minor child, without the knowledge or consent of her father and natural guardian, Steve Scofield.

123. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

124. Prior to performing the said abortion procedure, the Defendant, Paul Sibley, M.D., was under a duty to contact Plaintiff's father, Steve Scofield, and advise him that Jessica I. Scofield was consulting with Defendants, Paul Sibley, M.D., and All Women's Health Center of Gainesville, Inc., concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

125. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., willfully, wantonly and intentionally failed to contact, or failed to even attempt to contact Plaintiff's father, Steve Scofield, and to advise him that Jessica I. Scofield was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

126. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, Paul Sibley, M.D., willfully, wantonly and intentionally failed to counsel with and to fully disclose to Jessica I. Scofield all of the options available to Plaintiff concern her pregnancy, other than abortion.

127. As a direct result of said willful, wanton and intentional acts and omissions , the Defendant, Paul Sibley, M.D., breached said duty, and caused damage to Plaintiff by interfering with, and effectively preventing her from obtaining proper psychological and spiritual guidance, counseling and protection from her father and natural guardian, Steve Scofield.

128. As a direct result of said willful, wanton and intentional acts and omissions , the Defendant, Paul Sibley, M.D., caused damage to Plaintiff by withholding vital information concerning alternatives methods of proceeding in regard to her pregnancy, rather than abortion, thereby depriving Plaintiff of a factual basis for making a reasonable, rational and fully informed decision concerning a life altering situation.

129. As a direct result of said willful, wanton and intentional acts and omissions, the Plaintiff, Jessica I. Scofield, has been caused to sustain physical trauma, mental anguish, and emotional distress due to said abortion, and has been permanently deprived of her child, which would have been born, but for the willful, wanton and intentional acts and omissions of the defendant, Paul Sibley.

130. As a direct result of said willful, wanton and intentional acts and omissions, Defendant Sibley committed a sexual battery on Plaintiff, Jessica I. Scofield, while she was a minor child.

WHEREFORE, the Plaintiff, Jessica I. Scofield, demands judgment for punitive damages against the Defendant, Paul Sibley, M.D., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT TEN

The Plaintiff, Jessica I. Scofield, individually, sues the Defendant, All Women's Health Center of Gainesville, Inc., and says:

131. This is an action for damages that exceed the sum of \$25,000.00.

132. At all times material hereto, the Plaintiff, Jessica I. Scofield, was and is the natural child of Steve Scofield.

133. At all times material hereto, Plaintiff, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

134. At all times material hereto, the Defendant, All Women's Health Center of Gainesville, Inc., was acting as an employer, or principal of its authorized agent, Paul Sibley, M.D., and performed all acts alleged herein, at the facilities of All Women's Health Center of Gainesville, Inc., located at 1135 N.W. 23rd Avenue, in Gainesville, Alachua County, Florida.

135. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known that the Plaintiff, Jessica I. Scofield, was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

136. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the Plaintiff, Jessica I. Scofield, and that Plaintiff's father was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

137. On or about September 30, 1997, the Defendant, All Women's Health Center of Gainesville, Inc., by and through its employee or authorized agent Paul Sibley, M.D., negligently approved and performed an unauthorized abortion procedure on Plaintiff, Jessica I. Scofield, who was a minor child at the time, without the knowledge or consent of her father and natural guardian, Steve Scofield.

138. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

139. Prior to performing the said abortion procedure, the Defendant, All Women's Health Center of Gainesville, Inc., was under a duty to contact and advise Plaintiff's Father, Steve Scofield, that Jessica I. Scofield was consulting with Paul Sibley, M.D., concerning the possibility of having an abortion performed by, at the facilities of All Women's Health Center, Inc.

140. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, All Women's Health Center of Gainesville, Inc., negligently failed to contact, or failed to attempt to contact Plaintiff's father, Steve Scofield, and to advise him that Plaintiff was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

141. As a direct result of said negligence, the Defendant, All Women's Health Center of Gainesville, Inc., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff from receiving the parental and spiritual guidance Father, Steve Scofield, during her minority.

142. As a direct result of said negligence, the Defendant, All Women's Health Center of Gainesville, Inc., deprived Plaintiff, Jessica I. Scofield, of any and all opportunity she may have had to receive the love, protection, counseling, and guidance of her Father, Steve Scofield, during her minority.

143. As a direct result of said negligence, the Defendant, All Women's Health Center of Gainesville, Inc., deprived the Plaintiff, Jessica I. Scofield, of any and all opportunity she

may have had to experience the family relationship with and companionship of her child, who would have been born, but for the negligence of the Defendant, All Women's Health Center of Gainesville, Inc..

144. As a direct result of said negligence, the Defendant, All Women's Health Center of Gainesville, Inc., committed a sexual battery on Plaintiff, Jessica I. Scofield, while she was a minor child.

145. As a direct result of said negligence, Plaintiff, Jessica I. Scofield, has been caused to suffer mental pain and anguish, emotional distress, inconvenience, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Jessica I. Scofield, demands judgment for compensatory damages against the Defendant, All Women's Health Center of Gainesville, Inc., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT ELEVEN

The Plaintiff, Jessica I. Scofield, individually, sues the Defendant, All Women's Health Center of Gainesville, Inc., and says:

146. This is an action for damages that exceed the sum of \$25,000.00.

147. At all times material hereto, the Plaintiff, Jessica I. Scofield, was and is the natural child of Steve Scofield.

148. At all times material hereto, Plaintiff, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

149. At all times material hereto, the Defendant, All Women's Health Center of Gainesville, Inc., was acting as an employer, or principal of its authorized agent, Paul Sibley,

M.D., and performed all acts alleged herein, at the facilities of All Women's Health Center of Gainesville, Inc., located at 1135 N.W. 23rd Avenue, in Gainesville, Alachua County, Florida.

150. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known that the Plaintiff, Jessica I. Scofield, was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

151. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the Plaintiff, Jessica I. Scofield, and that Plaintiff's father was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

152. On or about September 30, 1997, the Defendant, All Women's Health Center of Gainesville, Inc., by and through its employee or authorized agent Paul Sibley, M.D., willfully, wantonly and intentionally approved and performed an unauthorized abortion procedure on Plaintiff, Jessica I. Scofield, who was a minor child at the time, without the knowledge or consent of her father and natural guardian, Steve Scofield.

153. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

154. Prior to performing the said abortion procedure, the Defendant, All Women's Health Center of Gainesville, Inc., was under a duty to contact and advise Plaintiff's Father,

Steve Scofield, that Jessica I. Scofield was consulting with Paul Sibley, M.D., concerning the possibility of having an abortion performed by, at the facilities of All Women's Health Center, Inc.

155. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, All Women's Health Center of Gainesville, Inc., willfully, wantonly and intentionally failed to contact, or failed to attempt to contact Plaintiff's father, Steve Scofield, and to advise him that Plaintiff was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

156. As a direct result of said willful, wanton and intentional acts and omissions, the Defendant, All Women's Health Center of Gainesville, Inc., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff from receiving the parental and spiritual guidance Father, Steve Scofield, during her minority.

157. As a direct result of said willful, wanton and intentional acts and omissions, the Defendant, All Women's Health Center of Gainesville, Inc., deprived Plaintiff, Jessica I. Scofield, of any and all opportunity she may have had to receive the love, protection, counseling, and guidance of her Father, Steve Scofield, during her minority.

158. As a direct result of said willful, wanton and intentional acts and omissions, the Defendant, All Women's Health Center of Gainesville, Inc., deprived the Plaintiff, Jessica I. Scofield, of any and all opportunity she may have had to experience the family relationship with and companionship of her child, who would have been born, but for the willful, wanton and intentional acts and omissions of the Defendant, All Women's Health Center of Gainesville, Inc..

159. As a direct result of said willful, wanton and intentional acts and omissions, the Defendant, All Women's Health Center of Gainesville, Inc., committed a sexual battery on Plaintiff, Jessica I. Scofield, while she was a minor child.

160. As a direct result of said willful, wanton and intentional acts and omissions, Plaintiff, Jessica I. Scofield, has been caused to suffer mental pain and anguish, emotional distress, inconvenience, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Jessica I. Scofield, demands judgment for compensatory damages against the Defendant, All Women's Health Center of Gainesville, Inc., together with court costs, and demands a trial by jury on all issues triable by jury.

COUNT TWELVE

The Plaintiff, Jessica I. Scofield, individually, sues the Defendant, All Women's Health Center of Gainesville, Inc., and says:

161. This is an action for damages that exceed the sum of \$25,000.00.

162. At all times material hereto, the Plaintiff, Jessica I. Scofield, was and is the natural child of Steve Scofield.

163. At all times material hereto, Plaintiff, Jessica I. Scofield, was a minor child, who lacked the legal capacity to enter into a contract.

164. At all times material hereto, the Defendant, All Women's Health Center of Gainesville, Inc., was acting as an employer, or principal of its authorized agent, Paul Sibley, M.D., and performed all acts alleged herein, at the facilities of All Women's Health Center of Gainesville, Inc., located at 1135 N.W. 23rd Avenue, in Gainesville, Alachua County, Florida.

165. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known that the Plaintiff, Jessica I. Scofield, was a minor child, and that she did not have legal capacity to enter into a contract, or to waive the parental rights of her father and natural guardian.

166. On or about September 30, 1997, the Defendants, Paul Sibley, M.D. and All Women's Health Center of Gainesville, Inc., knew or should have known, through the use of due care, that the Plaintiff, Steve Scofield was the father and natural guardian of the Plaintiff, Jessica I. Scofield, and that Plaintiff's father was entitled to exercise the parental rights and duties to raise, protect, counsel, and provide guidance to Jessica I. Scofield, during her years of minority.

167. On or about September 30, 1997, the Defendant, All Women's Health Center of Gainesville, Inc., by and through its employee or authorized agent Paul Sibley, M.D., willfully, wantonly and intentionally approved and performed an unauthorized abortion procedure on Plaintiff, Jessica I. Scofield, who was a minor child at the time, without the knowledge or consent of her father and natural guardian, Steve Scofield.

168. Said abortion procedure was performed on the premises of All Women's Health Center of Gainesville, Inc., and with the assistance of its employees or authorized agents.

169. Prior to performing the said abortion procedure, the Defendant, All Women's Health Center of Gainesville, Inc., was under a duty to contact and advise Plaintiff's Father, Steve Scofield, that Jessica I. Scofield was consulting with Paul Sibley, M.D., concerning the possibility of having an abortion performed by, at the facilities of All Women's Health Center, Inc.

170. Prior to performing the said abortion procedure on Jessica I. Scofield, the Defendant, All Women's Health Center of Gainesville, Inc., willfully, wantonly and intentionally failed to contact, or failed to attempt to contact Plaintiff's father, Steve Scofield, and to advise him that Plaintiff was consulting with him concerning the possibility of having an abortion performed by Paul Sibley, M.D., at the facilities of All Women's Health Center, Inc.

171. As a direct result of said willful, wanton and intentional acts and omissions, the Defendant, All Women's Health Center of Gainesville, Inc., breached said duty, and caused damage to Plaintiff by interfering with, and preventing the Plaintiff from receiving the parental and spiritual guidance Father, Steve Scofield, during her minority.

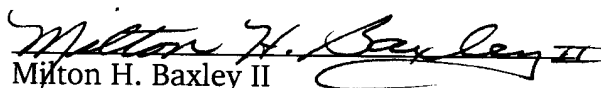
172. As a direct result of said willful, wanton and intentional acts and omissions, the Defendant, All Women's Health Center of Gainesville, Inc., deprived Plaintiff, Jessica I. Scofield, of any and all opportunity she may have had to receive the love, protection, counseling, and guidance of her Father, Steve Scofield, during her minority.

173. As a direct result of said willful, wanton and intentional acts and omissions, the Defendant, All Women's Health Center of Gainesville, Inc., deprived the Plaintiff, Jessica I. Scofield, of any and all opportunity she may have had to experience the family relationship with and companionship of her child, who would have been born, but for the willful, wanton and intentional acts and omissions of the Defendant, All Women's Health Center of Gainesville, Inc..

174. As a direct result of said willful, wanton and intentional acts and omissions, the Defendant, All Women's Health Center of Gainesville, Inc., committed a sexual battery on Plaintiff, Jessica I. Scofield, while she was a minor child.

175. As a direct result of said willful, wanton and intentional acts and omissions, Plaintiff, Jessica I. Scofield, has been caused to suffer mental pain and anguish, emotional distress, inconvenience, and said damages are permanent and continuing in nature.

WHEREFORE, the Plaintiff, Jessica I. Scofield, demands judgment for punitive damages against the Defendant, All Women's Health Center of Gainesville, Inc., together with court costs, and demands a trial by jury on all issues triable by jury.


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