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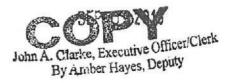
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Attorney for Plaintiff MARCÍA MCFEELEY, SUSAN MILLER, DAVID HEBDEN AND THE ESTATE OF VALERA HEBDEN

SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES

MARCIA MCFEELEY, SUSAN MILLER, DAVID HEBDEN AND THE ESTATE OF VALERA HEBDEN

Plaintiff,

CASE NO.

BC520219

COMPLAINT FOR MEDICAL MALPRACTICE WRONGFUL DEATH OF VALERA HEBDEN

Date of Death: 11-11-12

ANTELOPE VALLEY HOSPITAL

AND DOES 1 through 20,

inclusive

Defendants.

COMES NOW THE PLAINTIFF, MARCIA MCFEELEY, SUSAN MILLER, DAVID

HEBDEN AND THE ESTATE OF VALERA HEBDEN, AND FOR A FIRST CAUSE OF

ACTION AGAINST THE DEFENDANTS, ANTELOPE VALLEY HOSPITAL,

1 THROUGH 20, INCLUSIVE,

AND EACH OF THEM, COMPLAINS AND ALLEGES AS FOLLOWS:

- At least one of the Plaintiffs is a resident of the county of Los Angeles, State of 1. California.
- 2. Plaintiffs are the heirs of decedent, Valera Hebden.
- The true names and capacities, whether individual, corporate, associate or 3.

COMPLAINT FOR MEDICAL MALPRACTICE

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otherwise of Defendants, named herein as DOES 1 through 20, inclusive, and each of them, are unknown to Plaintiff, who therefore sues said Defendants by such fictitious names, and Plaintiff will ask leave of the Court to amend this Complaint to show their names and capacities when the same shall have been ascertained.

- 4. Plaintiff is informed and believes and, upon such information and belief, alleges that each Defendant designated herein as a DOE is responsible negligently, intentionally or in some other manner for the events and happenings herein referred to which legally caused those injuries and damages to Plaintiff as is hereafter alleged.
- 5. Plaintiff is informed and believes and, upon such information and belief, alleges that Defendants, and each of them, were the agents, servants and employees of their Co-Defendants and were, as such acting within the course, scope, purpose and authority of said agency and employment; that each of and every Defendant, as aforesaid, when acting as a principal, was negligent in the selection and hiring and continued employment of each and every Defendant as an agent, servant and employee.
- 6. Plaintiff is informed and believes and, upon such information and belief, alleges that at all times mentioned herein, Defendants, DOES 1 through 20 in inclusive, and each of them, were physical therapists, doctors, nurses, technicians, attendants, agents or employees of Defendants, ANTELOPE VALLEY HOSPITAL
- 7. Plaintiff is informed and believes that Defendants ANTELOPE VALLEY HOSPITAL, I were health care providers in the State of California and in fact currently practice in Lancaster, CA, County of Los Angeles, where plaintiff's mother was treated and died.
- 8. Plaintiff is informed and believes that Defendant ANTELOPE VALLEY HOSPITAL is located in Lancaster, CA, County of Los Angeles, where plaintiff's mother was treated and died.
- 9. That in the Fall of 2012, specifically October 31, 2012, Plaintiff's mother went to the medical facilities of Defendants, ANTELOPE VALLEY HOSPITAL,

and DOES 1 through 20, inclusive, and each of them, and said Defendants agreed and undertook to care for, treat, medically manage and assist each other in the performance of such medical services and all other medical procedures reasonable, necessary and proper to the health and well-being of decedent, Valera Hebden, including but not limited to properly treating decedent for her medical condition.

- HOSPITAL, and DOES 1
 through 20, inclusive, and each of them, said Defendants failed to possess and to exercise that degree of knowledge and skill ordinarily possessed to and exercised by other doctors, medical facilities, nurses, aides, attendants, technicians and other such styled personnel and employees in the same professions as Defendants, and each of them, in that Defendants so negligently, wrongfully, and unlawfully cared for, treated and medically managed decedent's condition as to cause her death, Defendants' failure to properly manage and treat decedent's recovery and Defendants' further failure to monitor decedent during the treatment was a substantial factor in causing her death on November 11, 2012.
- As a legal result of the negligence of Defendants, and each of them, as foresaid, decedent Valera Hebden died on November 11, 2012.
- 12. That as a further direct and legal cause of the negligence of the Defendants, and each of them, as aforesaid, Plaintiffs, MARCIA MCFEELEY, SUSAN MILLER, DAVID HEBDEN AND THE ESTATE OF VALERA HEBDEN, have lost love, companionship, support, care, assistance, protection, affection, moral support, sexual relations, training and guidance as a result of the wrongful death of Valera Hebden.
- 13. That as a further, direct and legal result of the negligence, carelessness and unlawfulness of the Defendants, and each of them, as aforesaid, Plaintiffs MARCIA MCFEELEY, SUSAN MILLER, DAVID HEBDEN AND THE ESTATE OF VALERA HEBDEN, were caused to and did suffer economic loss as a result of the wrongful death of Valera Hebden.

WHEREFORE, Plaintiff prays for judgment against the Defendants, and each of them, as follows:

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AS TO THE FIRST CAUSE OF ACTION:

- For general damages, according to proof;
- 2. For economic damages, according to proof;
- For prejudgment interest, according to law;
- 4. For costs of suit incurred herein; and
- For such other and further relief as this Court may deem just and proper.

DATED: August 28, 2013

LAW OFFICES OF STEVEN D. HILLYARD, APC

BY:

STEVEN D. HILLYARD Attorney for Plaintiff