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FILED
 SUPERIOR COURT OF CALIFORNIA
 COUNTY OF ORANGE
 CENTRAL JUSTICE CENTER
 MAY 21 2010
 ALAN CARLSON, Clerk of the Court
L. Stallworth
 BY L. STALLWORTH

5 Attorneys for Plaintiff
 6 Ron Castillo

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
 8 **COUNTY OF ORANGE**

9 **30-2010** BY FAX

10	RON CASTILLO)	Case No.
11	Plaintiff,)	00374749
12	vs.)	COMPLAINT FOR
13	RICHARD T. HANSEN, ANDREW YOON,)	1. MEDICAL NEGLIGENCE
14	individuals, dba COMPREHENSIVE DENTAL)	2. NEGLIGENCE
15	CENTER ASSOCIATES, and DOES 1)	DEMAND FOR JURY TRIAL
16	THROUGH 10, inclusive.)	JUDGE ANDREW P. BANKS
17	Defendants.)	DEPT. C11
18)	

19 Plaintiff RON CASTILLO ("plaintiff"), hereby complains against RICHARD T. HANSEN
 20 and ANDREW YOON, individuals, dba Comprehensive Dental Center Associates, and DOES 1
 21 THROUGH 10, inclusive (all defendants are sometimes referred to collectively as "defendants") and
 22 in support thereof alleges on information and belief the following:

23 **INTRODUCTION**

- 24 1. Plaintiff is and, at all times herein mentioned was, an adult living in Santa Barbara,
 25 California.
- 26 2. Defendants RICHARD T. HANSEN and ANDREW YOON are dentists who were
 27 at all times mentioned herein, practicing dentistry in Fullerton, California, County of Orange.
- 28 3. The true names or capacities of defendants DOES 1 through 50, inclusive, are

1 unknown to plaintiff who therefore sues those defendants by such fictitious names. Plaintiff is
2 informed and believes, and thereon alleges, that each such defendant is legally responsible in
3 some manner for the events herein referred to and for the proximately caused injuries and other
4 losses suffered by plaintiff, as herein alleged.

5 4. Plaintiff is informed and believes, and thereon alleges, that each of the defendants
6 named in this complaint, whether by true name or by fictitious name, was, at all relevant times,
7 herein, the agent, employee, representative, or successor-in-interest of each of the remaining
8 defendants, and that each defendant was acting within the scope and course of his or her agency,
9 service, representation and/or employment.

10 STATEMENT OF FACTS

11 5. In or about May, 2009, plaintiff underwent root canal work performed by
12 defendants. Soon after the work was completed, plaintiff began to experience unusual pain, and
13 reported the same to defendants during subsequent visits.

14 6. Thereafter, plaintiff developed sever infections in and around the teeth on which
15 defendants had worked. Defendants attributed said infections to birth problems, acupuncture and
16 other causes, and provided inappropriate and ineffective care. Photographic evidence supports the
17 severity of the infections and the lack of care consistent with applicable dental standards.

18 7. Until August of 2009, defendants continued to maintain that the root canal work
19 was done consistent with dental standards and that the infections would heal with time. Plaintiff
20 was repeatedly told to return for treatment of the infections and that the condition would resolve.

21 8. As a direct and proximate cause of the failure of defendants to properly perform
22 the root canals and treat the resulting infections, plaintiff has received extensive medical
23 treatment and has incurred significant expenses. Some of the injuries suffered by plaintiff appear
24 permanent in nature.

25 FIRST CAUSE OF ACTION

26 (Medical Negligence - Against All Defendants)

27 9. Plaintiff re-alleges and incorporates herein by reference each and every allegation
28 contained in paragraphs 1 through 8 as though fully set forth herein.

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2 10. From May to August, 2009, defendants failed to exercise the level of skill,
3 knowledge and care in diagnosis and treatment of plaintiff's teeth that other reasonably careful
4 dentists would possess and use in similar circumstances. Specifically, defendants failed to
5 properly perform root canals, failed to treat infections that developed thereafter, improperly
6 advised plaintiff as to the nature and degree of the problem, and provided false assurance that his
7 condition would improve with the care they were providing.

8 11. As a direct and legal result of the failure of defendants to provide services
9 consistent with the standard of care in their profession, plaintiff was harmed, and continues to
10 suffer severe and constant pain and continues to receive care for the problems defendants created.

11 SECOND CAUSE OF ACTION

12 (Negligence - Against all Individual Defendants)

13 12. Plaintiff re-alleges and incorporates herein by reference each and every allegation
14 contained in paragraphs 1 through 11 as though fully set forth herein.

15 13. From May to August, 2009, defendants were negligent in the care, diagnosis and
16 treatment of plaintiff's teeth. Specifically, defendants failed to properly perform root canals,
17 failed to treat infections that developed thereafter, improperly advised plaintiff as to the nature and
18 degree of the problem, and provided false assurance that his condition would improve with the
19 care they were providing.

20 14. That as a direct and legal result of the negligence of the defendants, and each of
21 them, plaintiff sustained damages, including physical injuries, the loss of his enjoyment of life,
22 severe and permanent emotional and mental distress, medical expenses, attorney fees, costs of
23 suit, and future damages and injuries still evolving in an amount and of a nature and degree not
24 yet determined.

25 PRAYER FOR RELIEF

26 WHEREFORE, plaintiff requests a jury trial and prays for judgment against defendants,
27 and each of them, as follows:

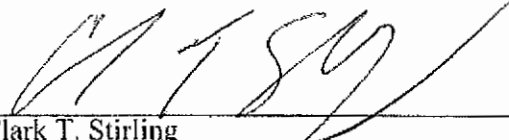
- 28 1. For all medical expenses, incurred and to be incurred;

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- 2. For general compensatory damages according to proof;
- 3. For such other and further relief as the Court may deem just and proper.

Dated: May 20, 2010

NYE, PEABODY, STIRLING & HALE, LLP



Clark T. Stirling
Attorneys for Plaintiff