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CIRCUIT COURT
OR MULTNOMAH

IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF MULTNOMAH

14914

ROYSHEKKA HERRING,

Plaintiff,

v.

AMERICAN MEDICAL RESPONSE
NORTHWEST, INC., AN OREGON
CORPORATION, AND LANNIE
HASZARD,

Defendants.

) Case No. **0712-14914**

) **COMPLAINT FOR BATTERY AND
NEGLIGENT RETENTION AND
SUPERVISION;**

) **Not Subject To Mandatory**

) **Arbitration**

FOR A FIRST CLAIM FOR RELIEF AGAINST

DEFENDANT LANNIE HASZARD FOR BATTERY, PLAINTIFF

ALLEGES:

1.

On or about December 8, 2007, Plaintiff Royshekka Herring lost consciousness at her home as a result of a gastric disorder. One of her children called 911, and she was picked by an ambulance owned and operated by American Medical Response, Inc., an Oregon corporation (hereinafter "AMR").

2.

At all times mentioned herein, Defendant Lannie Haszard was an agent and employee of Defendant AMR, and was acting in the course and scope of his agency and employment as an ambulance attendant and medical provider.

3.

At the above time and place, Defendant Lannie Haszard participated in transporting Plaintiff from her home to the Emanuel Hospital Emergency Room.

4.

During the above-described transport, at a time when Plaintiff was semi-conscious, Defendant Lannie Haszard touched and probed Plaintiff beneath her clothing in her pubic area, deliberately and without lawful justification.

5.

At all times mentioned herein, Defendant Lannie Haszard knew that the above-described touching was unwanted and unlawful.

6.

As a result of the above-described conduct, Plaintiff suffered, continues to suffer, and will permanently suffer from a sense of personal violation, emotional trauma, fear, anxiety, humiliation, and a heightened

1 sense of vulnerability, all to her non-economic damages in an amount to
2 be determined at trial.

3 **FOR A SECOND CLAIM FOR RELIEF AGAINST**
4 **DEFENDANT AMR, FOR NEGLIGENCE, PLAINTIFF**
5 **ALLEGES:**

6
7 7.

8 Plaintiff realleges and incorporates by reference Paragraphs 1-5
9 above.

10 8.

11 Defendant AMR is and at all times mentioned has been an Oregon
12 corporation in the business of providing medical and ambulance care.

13
14 9.

15 A cause of all damages and injuries herein was the negligence of
16 Defendant AMR in one of the following particulars:

17 (a) In retaining Lannie Haszard as an ambulance attendant
18 when Defendant AMR knew or had reason to know that he was likely to
19 sexually abuse ill or injured female patients.

20 (b) In failing to adequately supervise Lannie Haszard when
21 Defendant AMR knew or had reason to know that he was likely to
22 sexually abuse ill or injured female patients.

10.

1 Plaintiff realleges and incorporates by reference Paragraph 6, above.

2 WHEREFORE, Plaintiff prays for economic and non-economic
3 damage against each Defendant in an amount to be determined at trial,
4 and for costs and disbursements necessarily incurred herein.
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6 DATED: December 13, 2007.

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GREGORY KAFOURY, OSB #74166
MARK McDOUGAL, OSB #89086
Attorneys for Plaintiff

11 Plaintiff provides notice of her intent to amend to include claims
12 for punitive damages.
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