

)	
)	
)	
Petitioner/Plaintiff,)	
)	
Vs.)	
)	
)	
Respondent/Defendant)	
)	

NO. _____

FIRST CAUSE OF ACTION

3. As a proximate consequence of the actions of the defendant _____, as set forth hereinabove, _____ suffered deprivation of oxygen

to her brain for a period of time and a full cardiopulmonary arrest which resulted in her death on the _____ day of _____, 20____.

4. Plaintiff further avers that the defendants were guilty of negligence in one or more of the following ways:

- a. Negligently failing to provide _____ with adequate and timely medical care and treatment;
- b. Negligently failing to attend and treat;
- c. Negligently inserting or placing an endotracheal tube into _____'s esophagus so as to deprive her brain of oxygen and cause the aforementioned damages;
- d. Negligently failing to diagnose the incorrect placement of the endotracheal tube and to correct the placement in the trachea before brain damage and death occurred.

5. Further, the defendants, _____, A, B, and/or C, are vicariously liable for the actions of the defendant _____, who was employed by _____ Hospital, _____, A, B, and/or C, and who was acting as agent of said defendants at the time he negligently rendered care to _____.

WHEREFORE, the plaintiff, _____, as Administrator of the Estate of _____, deceased, demands judgment against the defendants, _____, _____ A, B, and C, for general damages plus interest and cost.

Respectfully submitted,

Dated: _____

Name: _____

Title:

Address:

Address:

City, State, Zip:

Phone:

Fax:

E-Mail:

Attorney No.:

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day mailed,
U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing to
_____, at the following address;

THIS the ____ day of _____, 20____.
