

MICHAEL K. JEANES  
Clerk of the Superior Court

By OLIVIA CARDENAS, Deputy  
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----- CASE# CV2005-002944 -----  
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10 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**  
11 **IN AND FOR THE COUNTY OF MARICOPA**

12 **BELEN CARRILLO,**  
13 **Plaintiff,**

14 **v.**

15 **EMERGENCY PROFESSIONAL**  
16 **SERVICES, P.C., an Arizona corporation,**  
17 **HIRAL V. TIPIRNENI, M.D., and JOHN**  
18 **DOE TIPIRNENI, wife and husband,**  
19 **Defendants.**

NO. CV2005-002944

COMPLAINT

(Tort - Non Motor Vehicle  
Medical Malpractice)

20 Plaintiff, for her Complaint alleges as follows:

21 1. Plaintiff is a resident of Maricopa County, Arizona. The events out of which  
22 this claim arises occurred in Maricopa County.

23 2. Defendant Emergency Professional Services, P.C., is an Arizona corporation  
24 doing business in Maricopa County, Arizona.

25 3. Defendant Hiral V. Tipirneni, M.D., is a medical doctor licensed by Arizona and  
26 is a resident of Maricopa County, Arizona. All acts of Dr. Tipirneni described below were  
performed in furtherance of her marital community with John Doe Tipirneni. All acts of  
Dr. Tipirneni were performed within the scope and course of her actual or apparent  
employment or agency with defendant Emergency Professional Services, P.C.

1  
2 4. On August 6, 2001, plaintiff sustained an injury to her lower leg in which the  
3 leg was badly lacerated with avulsion injury, under circumstances where a large amount of  
4 dirt was forced into the wounds.

5 5. On August 6, 2001, plaintiff sought medical care and treatment at Good  
6 Samaritan Regional Medical Center for her injuries. On and after August 6, 2001, defendants  
7 provided medical care to Belen Carrillo for her lower leg injury.

8 6. Plaintiff had a tetanus prone wound.

9 7. Plaintiff was a 72 year old lady with an unknown history of primary tetanus  
10 immunization series.

11 8. Established tetanus prophylaxis standards required a reasonable and prudent  
12 emergency physician to administer both a tetanus immunoglobulin for immediate protection,  
13 and also tetanus toxoid for continued protection.

14 9. Defendants were negligent in the medical care and treatment provided plaintiff  
15 including, but not limited to, failure to provide the tetanus immunoglobulin immunization  
16 needed for the immediate protection that those who have not had a primary immunization  
17 series require.

18 10. As a result of the negligence of the defendants, plaintiff developed tetanus,  
19 which in turn caused many physical problems such as renal failure, thrombi, hemorrhage and  
20 permanent injury and disability.

21 11. As a further result of the negligence of the defendants, plaintiff has required  
22 medical care and will require additional medical care for the rest of her life; she has incurred  
23 medical expenses and will incur additional expenses for medical care and therapy in the  
24 future; and she has suffered and will continue to suffer pain, emotional distress and physical  
25 limitations and disabilities.

26 12. Plaintiff's damages exceeds the court's jurisdictional limits.

1 13. Defendants have waived the statute of limitations defenses applicable to this  
2 action in an in-Court stipulation dated January 19, 2005, in Cause No. CV2002-006777.

3 **WHEREFORE**, plaintiff prays for judgment against defendants as follows:

4 (1) For plaintiff's past and future medical expenses in a total amount presently  
5 unknown but which amount will be proved at trial;

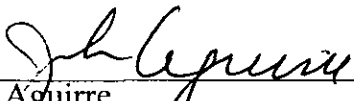
6 (2) For damages for plaintiff's pain, suffering and loss of enjoyment of life;

7 (3) For plaintiffs' costs incurred herein; and

8 (4) For such other and further relief as the Court deems just and proper.

9 **DATED** this 10th day of February, 2005.

10 **TREON, AGUIRRE & NEWMAN, P.A.**

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