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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF WASHINGTON

SHIN LIM KIM, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
PORTLAND ONNURI CHURCH and HYUN )  
JOO YOON, )  
 )  
Defendants. )

No. **00923220V**  
COMPLAINT  
(Claim in Excess of \$10,000.00; Claim  
Not Subject to Mandatory Arbitration;  
Personal Injury - Negligence)  
JURY TRIAL REQUESTED

FIRST CLAIM FOR RELIEF  
NEGLIGENCE

1. At all times material herein, Portland Onnuri Church was a church located at 19650 SW Scholls Ferry Road, Beaverton, Oregon 97007, and was a church owned by its members.

2. At all times material herein, plaintiff and defendant Hyun Joo Yoon were both individuals.

3. Plaintiff, while acting as a congregant at defendant church's facilities, was at the defendant church's facilities and premises and was injured when the hereinafter incident occurred.

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4.

On or about August 11, 2008, plaintiff had been asked by the person leading the church services to come and assist or catch another participant in the church service, who was going to be “blessed” or who would be “slain in the spirit” to assist in “catching” the other participant in the church service, who would have hands laid upon her by the leader of the church, and who would then be expected to fall backwards.

5.

Defendant Yoon had hands laid upon her by the leader of the church service on said date, and fell backwards and began flailing, falling on and injuring plaintiff as described herein below.

6.

Defendant church was negligent in one or more of the following particulars:

a. In failing to provide multiple “catchers” for persons who will be falling backwards, so that catchers can safely catch the falling participant in the church service.

b. In failing to have safety meetings or and other safety procedures and to discuss safe catching strategy, and in failing to advise plaintiff of safe methods to catch another participant in the church service.

c. In selecting plaintiff, a small and not particularly strong person, to catch a falling participant in this service.

d. In failing to have mats and/or other soft surfaces on the altar to provide for a safe method to lessen participants in the service, so that persons involved in the laying on of the hands will not be injured by the falling participants in the service.

e. In failing to warn plaintiff of the dangers of injury in acting as a person intended to catch the other participant in the service.

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1 f. By failing to instruct other participants in the service, including Ms. Yoon,  
2 of the correct procedures to fall, so that they would not injure themselves and injure the person  
3 assisting and/or catching them.

4 g. In failing to have stout and strong personnel available to catch participants  
5 in the service who will be falling backwards.

6 7.  
7 Defendant Yoon was negligent in one or more of the following particulars:

8 a. In failing to control her body when the person leading the service laid  
9 hands upon her, so that she did not injure plaintiff when she fell.

10 b. In flailing around when the person leading the service laid hands upon her,  
11 and otherwise failing to control her bodily movements.

12 8.  
13 As a direct and proximate result of defendants', and each of the their, negligence,  
14 plaintiff suffered a lumbar spine compression fracture at L-2 and was otherwise rendered sick,  
15 sore, nervous and distressed and suffered acute pain to her low back. Some of plaintiff's injuries  
16 are permanent in nature.

17 9.  
18 As a direct and proximate result of defendants' negligence, plaintiff has incurred  
19 medical expenses in excess of \$7,500.00, and continues to incur medical expenses. \$5,000.00 of  
20 said medical expenses has been paid by a representative of defendant Portland Onnuri Church.

21 10.  
22 Plaintiff has incurred non-economic damages, not to exceed \$125,000.00.

23 WHEREFORE, plaintiff prays for judgment against the defendants in the sum of  
24 \$125,000.00 non-economic damages, plus plaintiff's the portion of the medical expenses which  
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1 have not already been paid by defendant's representative, plus plaintiff's costs and disbursements  
2 incurred herein.

3 DATED this 13 day of April, 2009.

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David R. Nepon, OSB #80467  
Attorney for Plaintiff

7 APPROVED:

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Shin Lim Kim

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