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7 **PATRICE GRINNELL & ASHLEY GRINNELL**

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF SACRAMENTO**

11 **PATRICE GRINNELL and ASHLEY**  
12 **GRINNELL,**

13 Plaintiffs,

14 vs.

15  
16 **KAISER FOUNDATION HOSPITALS;**  
17 **KAISER FOUNDATION HEALTH**  
18 **PLAN; THE PERMANENTE MEDICAL**  
19 **GROUP; G.H., M.D.; and DOES 1**  
20 **through 30, inclusive,**  
21 **Defendants.**

CASE NO.

**COMPLAINT FOR PERSONAL**  
**INJURIES AND DAMAGES**

**[Damages in Excess of \$25,000.00]**

22 COME NOW Plaintiffs PATRICE GRINNELL (hereinafter "PATRICE"),  
23 ASHLEY GRINNELL (hereinafter "ASHLEY"), and allege against Defendants KAISER  
24 FOUNDATION HOSPITALS (hereinafter "HOSPITALS"), KAISER FOUNDATION  
25 HEALTH PLAN (hereinafter "PLAN"), THE PERMANENTE MEDICAL GROUP  
26 (hereinafter "GROUP"), G.H., M.D. (hereinafter G.H.), and DOES 1 through 30,  
27 inclusive, and each of them, as follows:  
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**File by Fax**

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**PARTIES**

1. Plaintiff is informed and believes and thereon alleges that Defendant KAISER FOUNDATION HOSPITALS is a licensed acute care hospital operating in the County of Sacramento, State of California, and provides medical services.

2. Plaintiff is informed and believes that Defendant PERMANENTE MEDICAL GROUP is a for profit organization which is a medical group that provides and arranges for medical care and treatment of patients.

3. Plaintiff is informed and believes that Defendant KAISER FOUNDATION HEALTH PLAN is a duly organized California Corporation that provides health insurance for its members.

4. Plaintiff is informed and believes that together, the foregoing three Defendants form Kaiser Permanente, a health maintenance organization in the State of California.

5. At all times mentioned herein, Defendant G.H., M.D. was a duly licensed physician, licensed to practice medicine, perform surgery, and/or provide other medical services in the State of California, County of Sacramento, and held himself out to possess that degree of skill, ability and learning applicable to physicians, surgeons, and/or other medical practitioners in said community. Due to the sensitive nature of the claims set forth herein, this Defendant is named by his initials.

6. The occurrence of events which are the subject matter of this Complaint occurred within the County of Sacramento, State of California.

7. The true names and capacities of Defendants, whether individual, corporate, associate, or otherwise, sued herein as DOES 1 through 30, inclusive, are presently unknown to Plaintiffs, who therefore sue such Defendants by fictitious names, pursuant to Code of Civil Procedure section 474. Plaintiffs are informed and believe and thereon allege that the fictitiously named Defendants, and each of them, sued as DOES 1 through 30, inclusive, are in some manner legally responsible to Plaintiffs for the events and happenings herein referred to, and proximately caused damages to Plaintiffs as set forth

1 herein. Plaintiffs will seek leave of court to amend this Complaint to insert the true names  
2 and capacities of said fictitiously named Defendants, and each of them, when the same  
3 have been ascertained.

4 8. Plaintiffs are informed and believe and on that basis alleges that at all times relevant  
5 herein, each of the Defendants, including each fictitiously named Defendant, was the  
6 partner, agent, joint venture, co-conspirator, lessor, lessee, servant, and/or employee of  
7 each of the remaining Defendants, and in doing the acts or things alleged herein were  
8 acting within the course and scope of such partnership, agency, employment, and/or other  
9 relationship stated herein, and in doing the acts herein alleged, was acting with the consent,  
10 approval, ratification, permission and/or authorization of each of the remaining  
11 Defendants.

12 **FACTUAL SUMMARY**

13 9. Plaintiffs re-allege and incorporate by reference Paragraphs 1 through 8 as though  
14 fully set forth herein.

15 10. In or about 1987 Plaintiff PATRICE consulted with and employed HOSPITAL,  
16 PLAN, GROUP, and/or G.H., M.D., and DOES 1 through 30, inclusive, and each of them,  
17 (hereinafter collectively referred to as "Defendants") for reproductive problems regarding  
18 difficulties conceiving a child. Following consultation and examination, PATRICE  
19 agreed to a medical procedure using donor sperm/semen to be inseminated. The donor  
20 sperm/semen was to come from an anonymous donor with characteristics selected by  
21 PATRICE.

22 11. The insemination procedure was then performed on PATRICE by Defendant G.H.,  
23 M.D., and DOES 16 through 30, inclusive, and each of them, at Kaiser medical facilities  
24 in Sacramento.

25 12. Following the insemination procedure, on October 27, 1987, PATRICE gave birth  
26 to Plaintiff ASHLEY.

27 13. Defendant G.H., M.D. remained PATRICE'S physician until approximately 2015.

28 14. When ASHLEY reached adulthood she consulted with and employed G.H., M.D.