COMMONWEALTH OF KENTUCKY JEFFERSON CIRCUIT COURT DIVISION ____ CASE NO.

Electronically Filed

ANDRES LOPEZ VASQUEZ, both individually and as Administrator of the Estate of Marvi Eduardo Lopez Vasquez

23-CI-004533 07/27/2023

&

PEDRO ALEXANDER LOPEZ VASQUEZ

PLAINTIFFS

v. <u>COMPLAINT</u>

NORTON IMMEDIATE CARE CENTER NORTON CHILDREN'S AFTER-HOURS

DEFENDANTS

7926 Preston Highway Louisville, Kentucky 40219

NORTON HEALTHCARE, INC.

4967 U.S. Highway 42 Suite 100 Louisville, KY 40222

> Serve: Robert B. Azar 4967 US Highway 42 Suite 101 Louisville, KY 40222

COMMUNITY MEDICAL ASSOCIATES, INC d/b/a Norton Immediate Care Centers 4801 Olympia Park Plaza

Suite 3000 Louisville, KY 40222

> Serve: Robert B. Azar 4967 US Highway 42

Presiding Judge: HON. JENNIFER BRYANT WILCOX (630455)

Suite 101 Louisville, KY 40222

JANE DOE, NORTON EMPLOYEE

7926 Preston Highway Louisville, Kentucky 40219

07/27/2023

Come the Plaintiffs, Andres Lopez Vasquez, individually and as Administrator of the Estate of Marvi Eduardo Lopez Vasquez, and Pedro Alexander Lopez Vasquez by counsel, and for their Complaint against Defendants, state as follows:

PARTIES

- 1. Plaintiff Andres Lopez Vasquez has been appointed the Administrator of the Estate of Marvi Eduardo Lopez Vasquez. Andres Lopez Vasquez was appointed the Administrator of the Estate on or about February 20, 2023. Marvi Eduardo Lopez Vasquez was of Guatemalan descent and a United States immigrant. Andres Lopez Vasquez is the brother of the decedent. Andres Lopez Vasquez brings claims against Defendants both individually on his own behalf and in his capacity and on behalf of the Estate of Marvi Eduardo Lopez Vasquez. At all times relevant hereto, Andres has resided in Jefferson County, KY.
- Pedro Alexander Lopez Vasquez is the brother of the decedent, Marvi Eduardo Lopez Vasquez and also the brother of Andres Lopez Vasquez. At all times relevant hereto, Pedro has resided in Jefferson County, KY.
- 3. Defendant, Norton Immediate Care Center Norton Children's After-Hours, is an urgent care/immediate care medical facility located at 7926 Preston Highway, Louisville, KY. Norton Immediate Care Center Norton Children's After-Hours does business in Jefferson County, Kentucky. Upon information and belief, Norton Immediate Care Center Norton Children's After-Hours is owned, operated, and/or managed by Defendants Norton

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Healthcare, Inc. and/or Community Medical Associates, Inc. Norton Immediate Care Center Norton Children's After-Hours has the requisite minimum contacts in Kentucky required to invoke jurisdiction of this Court.

- 4. Defendant, Norton Healthcare, Inc. is a Kentucky Corporation with a principal office address located at 4967 US Highway, Suite 100, Louisville, KY 40222. Norton is registered with the Kentucky Secretary of State and does business in Jefferson County, Kentucky. Norton has the requisite minimum contacts in Kentucky required to invoke jurisdiction of this Court.
- 5. Defendant, Community Medical Associates, Inc., d/b/a Norton Immediate Care Centers, is a Kentucky Corporation with a principal office address located at 4801 Olympia Park Plaza, Suite 3000, Louisville, KY 40222. Community Medical Associates, Inc. is registered with the Kentucky Secretary of State and does business in Jefferson County, Kentucky. Community Medical Associates, Inc. has the requisite minimum contacts in Kentucky required to invoke jurisdiction of this Court.
- 6. Defendant, Jane Doe, Norton Employee, is/was a female employee of Defendants who primarily spoke with Plaintiffs Pedro and Andres at the Norton Immediate Care Center Norton Children's After-Hours facility on the night of the incident that is the subject of this Complaint.
- 7. The Defendants, Norton Immediate Care Center Norton Children's After-Hours, Norton Healthcare, Inc., and Community Medical Associates, Inc. shall be referred to collectively as "Norton" for the remainder of this pleading.

JURISDICTIION AND VENUE

- 8. Plaintiffs seeks damages in excess of the jurisdictional minimum of this Court.
- 9. The events complained of herein occurred in Jefferson County, Kentucky.
- 10. This Court has jurisdiction over this matter, and venue is proper in the Jefferson Circuit Court.

FACTS

- 11. Plaintiffs re-allege and incorporate all of the allegations contained in the previous paragraphs as if fully set forth herein.
- 12. The facts articulated below largely summarize the conduct of the Defendants, the decedent Marvi Eduardo Lopez Vasquez, and his brothers Pedro Alexander Lopez Vasquez and Andres Lopez Vasquez.
- 13. Marvi and his brothers were/are Guatemalan.
- 14. Marvi was just fifteen (15) years old at the time of his death.
- 15. On or about the morning of January 11, 2023, Marvi told his family that he had a stomachache.
- 16. Marvi's condition persisted and worsened during the evening and he did not feel like eating his dinner. At around 8:00 p.m., he threw up and felt feverish.
- 17. Marvi's brothers, Pedro and Andres, went to a local store to purchase over-the-counter medicine to help Marvi with his symptoms.
- 18. When they returned home they encouraged Marvi to lay down and sleep.
- 19. Around 9:00 p.m., Marvi told his brothers that he could not sleep and that he felt worse.
- 20. At this point, Marvi's brothers decided to take Marvi to the Norton Immediate Care Center ("Norton"), located at 7926 Preston Highway, the closest medical facility to their house they were aware of.

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21. Just after 9:00 p.m., Marvi and his brothers got in the car and drove to the Norton location.

Marvi was the back seat passenger. Marvi's pain worsened and he became very weak during the trip to Norton.

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- 22. They reached Norton at 9:17 p.m. At this point, Marvi was in so much pain that he was unable to speak. Marvi was breathing and moving around as he writhed in pain.
- 23. Marvi was removed from the car but was unable to walk on his own power. The brothers laid Marvi down in the parking lot, but were unable to move him inside on their own.

 Marvi's brother, Andres, held Marvi to comfort him while they awaited medical care or assistance.
- 24. Marvi's other brother, Pedro, proceeded inside the Norton facility and immediately announced, in English, that he needed help for his brother outside.
- 25. The Norton receptionist personnel responded to this cry for help by asking to see "his papers." Pedro was confused by this request and continued to ask for help for his brother.
- 26. Norton staff contacted a telephonic translator so that they could communicate with Pedro.

 The Norton receptionist personnel, through the translator, informed Pedro that if he did not
 "have papers" for Marvi, Norton would provide no assistance whatsoever.
- 27. Meanwhile in the parking lot, after some time had elapsed Marvi vomited and seemed to lose consciousness.
- 28. Back inside, the Norton receptionist staff finally handed Pedro a document containing a list of alternative care facilities they could take Marvi to and told them to leave the premises.
- 29. Pedro returned to the parking lot and told Andres what had occurred inside. Seeing Marvi's declining condition, Andres entered the Norton facility to plead for help.

30. Unfortunately, the Norton staff similarly turned him away.

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- 31. Without any other option, at 9:29 p.m. the brothers frantically loaded Marvi back into the car and drove to Mary & Elizabeth Hospital.
- 32. Marvi received no assistance, including CPR or any other care for the twelve (12) minutes he was on the Norton premises. Upon information and belief, Plaintiffs believe that nobody from Norton called for EMS.
- 33. Marvi and his brothers arrived at Mary & Elizabeth Hospital sixteen (16) minutes later at 9:45 p.m. Thus, from the moment Marvi first arrived at Norton to when he finally began receiving care from Mary & Elizabeth at 9:45 pm, twenty-eight (28) minutes had elapsed.
- 34. Once Mary & Elizabeth Hospital staff finally received Marvi for care, tragically the medical record states: "Given prolonged down time without CPR (10-15 min drive from urgent care + time in our parking lot + time to pull patient from car and place on stretcher) and presentation with fixed/dilated pupils, there was great concern for prognosis."
- 35. Despite the Mary & Elizabeth staff and treating physicians performing multiple lifesustaining measures, they were unable to save Marvi's life.
- 36. Marvi's time of death was 10:08 p.m.
- 37. Upon information and belief, Marvi was looking to Defendants for treatment and medical care.
- 38. Defendants are directly or vicariously liable for any acts and omissions by any person or entity, directly or indirectly controlled, including any governing body, officer, employee, ostensible or apparent agent, partner, consultant or independent contractor, whether inhouse or outside individuals, entities, agencies or pools.

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39. Defendants failed to discharge their obligations of care to Marvi, and in so failing, displayed a conscious disregard for his rights and safety. At all times mentioned herein, Defendants, individually and/or through their corporate officers and administrators, had knowledge of, ratified and/or otherwise authorized all of the acts and omissions that caused the injuries suffered by Marvi, as more fully set forth below.

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- 40. Due to the wrongful conduct of the Defendants, Marvi suffered accelerated deterioration of his health and physical condition, including conditions causing pain and suffering and, ultimately, Marvi's untimely death.
- 41. Plaintiffs also suffered unnecessary loss of personal dignity, extreme pain and suffering, degradation, mental anguish, disability, disfigurement, and loss of life, all of which were caused by the wrongful conduct of Defendants as alleged below.

COUNT I (MEDICAL NEGLIGENCE)

- 42. Plaintiffs re-allege and incorporate all of the allegations contained in previous paragraphs as if fully set forth herein.
- 43. The Defendants, by and through themselves, their duly authorized agents, servants and/or employees, refused to undertake to examine, diagnose, treat, attend to, and care for Marvi, despite owing him this duty of care.
- 44. The Defendants by and through themselves, their duly authorized agents, servants and/or employees, presented to Marvi as competent medical and care providers adhering to the applicable standards of care at the prevailing time. At all times relevant to this action, the Defendants by and through themselves, their duly authorized agents, servants and/or employees represented they would use reasonable care and adhere to the applicable standards of medical treatment, diagnosis and care of Marvi.

- 45. The Defendants by and through themselves, their duly authorized agents, servants and/or employees, failed to exercise the degree of care and skill expected of a reasonably competent medical professional acting in the same or similar circumstance when rendering medical care to Marvi. The Defendants by and through themselves, their duly authorized agents, servants and/or employees failed to, neglected to and omitted to properly care, advise, treat, supervise, consult, prescribe, monitor, examine, test, and exercise the necessary skill and care expected of a reasonably competent physician or medical provider in the care and treatment of Marvi.
- 46. The Defendants, through the doctrine of Respondent Superior, are responsible for the actions, breaches, negligence, and etc. of their agents and employees who were acting in the scope of their employment/agency.
- 47. As a direct and proximate result of the negligence and careless acts and omissions of the Defendants, Marvi suffered excruciating mental and physical pain, as well as medical expenses.

COUNT II (SURVIVAL ACTION)

- 48. Plaintiffs re-allege and incorporate all of the allegations contained in previous paragraphs as if fully set forth herein.
- 49. Defendants owed Marvi a duty of care as medical providers.
- 50. Defendants breached the duty they owed to Marvi, which caused Marvi to suffer injury and, ultimately, to perish.
- 51. Plaintiffs are entitled to recover damages for the injuries sustained after the Defendants' actions that harmed Marvi prior to his death.

- 52. Plaintiffs' damages include extreme pain and suffering, loss of dignity, medical costs, emotional damages, embarrassment, and otherwise unnecessary hospitalization, among others.
- 53. Plaintiffs are entitled to recover from Defendants.

COUNT III (WRONGFUL DEATH)

- 54. Plaintiffs re-allege and incorporate all of the allegations contained in previous paragraphs as if fully set forth herein.
- 55. As a direct and proximate result of the previously alleged conduct, all of which was grossly negligent, or was oppressive, fraudulent or malicious, Defendants caused the death of Marvi by their wrongful conduct.
- 56. Marvi suffered personal injuries, including extreme pain and suffering, mental anguish, disability, disfigurement, degradation, and unnecessary loss of personal dignity, resulting in his death on January 11, 2023. The extreme pain and suffering, mental anguish, disability, disfigurement, degradation, and unnecessary loss of dignity suffered by Marvi caused his family to suffer more than normal grief upon his death.
- 57. As a direct and proximate result of the wrongful death suffered by Marvi, Plaintiffs assert, against Defendants, a claim for judgment for all compensatory and punitive damages including, but not limited to, medical expenses, funeral expenses and other related costs, the grief suffered by statutory beneficiaries, extreme pain and suffering, mental anguish, disability, disfigurement, hospitalizations, degradation, unnecessary loss of personal dignity, and loss of life, in an amount to be determined by the jury, but in excess of the minimum jurisdictional limits of this Court, as well as costs and attorney's fees, plus costs and all other relief to which Plaintiffs are entitled by law.

58. Defendants committed wrongful acts that proximately caused the death of Marvi. As such, the wrongful death beneficiaries should be compensated for the losses resulting from Marvi's death.

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- 59. Plaintiffs bring this action pursuant to KRS 411.130, and any other statutes or common law related to an action for wrongful death.
- 60. Plaintiffs are entitled to recover from these Defendants.

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COUNT IV (NEGLIGENCE)

- 61. Plaintiffs re-allege and incorporate all of the allegations contained in previous paragraphs as if fully set forth herein.
- 62. The Defendants owed Plaintiffs and Marvi a duty of reasonable care as he presented to Norton for care and help.
- 63. The Defendants breached this duty by failing to provide any care or assistance to Marvi.
- 64. This breach caused damages, including pain and suffering, the impairment of future earnings, medical expenses, and other statutory damages.

COUNT V (PUNITIVE DAMAGES)

- 65. Plaintiffs re-allege and incorporate all of the allegations contained in previous paragraphs as if fully set forth herein.
- 66. The Defendants, by and through their agents, ostensible agents, servants and/or employees, had a duty to act reasonably in caring for Marvi and adhere to the applicable standards of medical treatment, diagnosis and care of Marvi.
- 67. The Defendants failed to exercise the degree of care expected of a reasonably competent medical professional acting in the same or similar circumstance when rendering medical care to Marvi. This failure includes but is not limited to requiring Marvi and/or his brothers

Presiding Judge: HON. JENNIFER BRYANT WILCOX (630455)

to produce "papers" as a condition to evaluating the patient, failing to evaluate the patient, failing to provide basic care such as CPR and/or other stabilizing care, failing to call 911 or an ambulance so that Marvi could have received medical care during his transit to the hospital, and etc.

- 68. As a direct and proximate cause of Defendants' negligent conduct while providing medical treatment, diagnosis and care, Marvi and Plaintiffs suffered permanent physical injury.
- 69. With regard to each of the foregoing acts of negligence, the Defendants acted with oppression, fraud, malice or were grossly negligent by acting with wanton or reckless disregard for the health and safety of Marvi or Plaintiffs.
- 70. The Plaintiffs are entitled to punitive damages.

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- 71. The heightened standard of proof for punitive damages as required by the General Assembly in KRS 411.184(2) is unconstitutional and should be determined to be null and void.
- 72. The restrictions on recovery of punitive damages against a principal or employer, as set forth in KRS 411.184(3), are unconstitutional and should be determined to be null and void.

COUNT VI (NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)

- 73. Plaintiffs re-allege and incorporate all of the allegations contained in previous paragraphs as if fully set forth herein.
- 74. Defendants owed duties of care to Marvi's brothers and bystanders at Defendants' refusal to treat, care for, and/or assist Marvi.
- 75. Defendants failed to exercise ordinary care in the discharge of the duties owed to Marvi's brothers and were negligence in the performance of such duties as alleged herein.

76. As a direct and proximate result of the acts and omissions of Defendants, as set forth herein, Marvi's brothers suffered serious and/or severe injuries as alleged herein.

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WHEREFORE, Plaintiffs, demand as follows:

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- 1. Judgment on all counts of their Complaint;
- 2. Leave to amend their Complaint as proof develops;
- Compensation for past and future medical expenses, past and future pain and suffering, impairment of future ability to labor and earn wages, and other compensatory damages;
- 4. For an award of punitive damages in such amount as a jury may find just at trial of this matter;
- 5. For punitive damages;
- 6. For an award of their costs expended herein;
- 7. For an award of their reasonable attorney fees;
- 8. For any and all other such relieve to which they may appear entitled.

Respectfully submitted,

/s/ John K. Spalding (95065)

John Spalding (95065) Fernando Valdizan (94532) 904 Minoma Avenue Louisville, KY 40217 Telephone: (502) 882-7552

John@arwhitelaw.com fernando@arwhitelaw.com

NO	JEFFERSON CIRCUIT COURT
	DIVISION
	JUDGE

07/27/2023

Electronically Filed

ANDRES LOPEZ VASQUEZ, both individually and as Administrator of the Estate of Marvi Eduardo Lopez Vasquez, et al.

PLAINTIFFS

 \mathbf{v}_{\bullet}

CERTIFICATE OF MERIT

NORTON IMMEDIATE CARE CENTER NORTON CHILDREN'S AFTER-HOURS, et al.

23-CI-004533

DEFENDANTS

* * * * *

Andres Lopez Vasquez as Administratix of the Estate of Marvi Eduardo Lopez Vasquez and the Wrongful Death Beneficiaries, hereafter "Claimants", hereby declare by and through the undersigned attorney that Claimants have reviewed the facts of this case and consulted with a physician who is qualified under the Kentucky Rules of Civil Procedure and the Kentucky Rules of Evidence to give testimony as to the standard of care and/or negligence, and who Claimants and/or Claimants' attorney reasonably believes is knowledgeable in the relevant issues involved in this action and concluded based upon review and consultation that there is a reasonable basis to commence this action.

Alex R. White, PLLC

<u>/s/ John K. Spalding</u>

John K. Spalding (95065) Alex R. White, PLLC 908 Minoma Avenue Louisville, Kentucky 40217

Phone: (502) 882-7552

23-CI-004533

Fax: (502) 585-3559
john@arwhitelaw.com
fernando@arwhitelaw.com
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was served on the Defendants as an attachment to the Complaint in this action.

07/27/2023

By: <u>/s/John K. Spalding</u>
John K. Spalding

AOC-E-105 Sum Code: CI Rev. 9-14

Commonwealth of Kentucky
Court of Justice Courts.ky.gov

CR 4.02; Cr Official Form 1



Case #: 23-CI-004533

Court: CIRCUIT

County: **JEFFERSON Circuit**

Plantiff, ESTATE OF MARVI EDUARDO LOPEZ VASQUEZ ET AL VS. NORTON IMMED, Defendant

TO: NORTON IMMEDIATE CARE CENTER NORTON CHILD 4967 U.S. HIGHWAY 42 SUITE 101 LOUISVILLE, KY 40222

The Commonwealth of Kentucky to Defendant: NORTON IMMEDIATE CARE CENTER NORTON CHILD

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

Jefferson Circuit Clerk Date: **7/27/2023**

DAVIS L. Nicholer

Proof of Service		
This Summons was:		
☐ Served by delivering a true copy and the Complaint (or other	r initiating document)	
To:		
☐ Not Served because:		
Date:, 20	Served By	
	Title	

Summons ID: @00001039843 CIRCUIT: 23-CI-004533 Certified Mail





Commonwealth of Kentucky
Court of Justice Courts.ky.gov

Sum Code: CI

CR 4.02; Cr Official Form 1



Case #: 23-CI-004533

Court: CIRCUIT

County: **JEFFERSON Circuit**

Plantiff, ESTATE OF MARVI EDUARDO LOPEZ VASQUEZ ET AL VS. NORTON IMMED, Defendant

TO: JANE DOE
4967 U.S. HIGHWAY 42
SUITE 101
LOUISVILLE, KY 40222

The Commonwealth of Kentucky to Defendant: **JANE DOE**

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

Jefferson Circuit Clerk Date: **7/27/2023**

DAVIS L. Nicholor

Proof of Service			
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Summons ID: @00001039844 CIRCUIT: 23-CI-004533 Certified Mail





Commonwealth of Kentucky
Court of Justice Courts.ky.gov

Sum Code: CI

CR 4.02; Cr Official Form 1



Case #: 23-CI-004533

Court: CIRCUIT

County: **JEFFERSON Circuit**

Plantiff, ESTATE OF MARVI EDUARDO LOPEZ VASQUEZ ET AL VS. NORTON IMMED, Defendant

TO: NORTON IMMEDIATE CARE CENTER NORTON CHILD 7926 PRESTON HIGHWAY LOUISVILLE, KY 40219

Memo: Alternative Service Address exists.

The Commonwealth of Kentucky to Defendant:

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

Jefferson Circuit Clerk Date: **7/27/2023**

DAVIS L. Nicholor

Proof of Service			
This Summons wa	as:		
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Summons ID: @00001039845 CIRCUIT: 23-CI-004533 Certified Mail





Commonwealth of Kentucky Court of Justice Courts.ky.gov

CR 4.02; Cr Official Form 1



Case #: 23-CI-004533

Court: CIRCUIT

County: **JEFFERSON Circuit**

Plantiff, ESTATE OF MARVI EDUARDO LOPEZ VASQUEZ ET AL VS. NORTON IMMED, Defendant

TO: JANE DOE 7926 PRESTON HIGHWAY **LOUISVILLE, KY 40219**

Sum Code: CI

Memo: Alternative Service Address exists.

The Commonwealth of Kentucky to Defendant:

You are hereby notified that a legal action has been filed against you in this Court demanding relief as shown on the document delivered to you with this Summons. Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

> Jefferson Circuit Clerk Date: 7/27/2023

DAVIS L. Nicholor

Proof of Service This Summons was: ☐ Served by delivering a true copy and the Complaint (or other initiating document)

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Date: , 20 Served By

Title

Summons ID: @00001039846 CIRCUIT: 23-CI-004533 Certified Mail

ESTATE OF MARVI EDUARDO LOPEZ VASQUEZ ET AL VS. NORTON IMMED



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Case #: **23-CI-004533**

Court: CIRCUIT

County: **JEFFERSON Circuit**

Plantiff, ESTATE OF MARVI EDUARDO LOPEZ VASQUEZ ET AL VS. NORTON IMMED, Defendant

TO: ROBERT B AZAR
4967 US HIGHWAY 42
SUITE 101
LOUISVILLE, KY 40222

Memo: Related party is NORTON HEALTHCARE, INC.

The Commonwealth of Kentucky to Defendant:

NORTON HEALTHCARE, INC.

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

Jefferson Circuit Clerk Date: **7/27/2023**

PAVIS L. Nicholer

Proof of Service		
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Date:, 20	Served By	
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Summons ID: @00001039847 CIRCUIT: 23-CI-004533 Certified Mail





Court of Justice

Commonwealth of Kentucky

Sum Code: CI

Courts.ky.gov

CR 4.02; Cr Official Form 1



Case #: **23-CI-004533**

Court: CIRCUIT

County: **JEFFERSON Circuit**

Plantiff, ESTATE OF MARVI EDUARDO LOPEZ VASQUEZ ET AL VS. NORTON IMMED, Defendant

TO: ROBERT B AZAR
4967 US HIGHWAY 42
SUITE 101
LOUISVILLE, KY 40222

Memo: Related party is COMMUNITY MEDICAL ASSOCIATES, INC.

The Commonwealth of Kentucky to Defendant: **COMMUNITY MEDICAL ASSOCIATES, INC.**

You are hereby notified that a **legal action has been filed against you** in this Court demanding relief as shown on the document delivered to you with this Summons. **Unless a written defense is made by you or by an attorney on your behalf within twenty (20) days** following the day this paper is delivered to you, judgment by default may be taken against you for the relief demanded in the attached complaint.

The name(s) and address(es) of the party or parties demanding relief against you or his/her (their) attorney(s) are shown on the document delivered to you with this Summons.

Jefferson Circuit Clerk Date: **7/27/2023**

PAVIS L. Nicholer

Proof of Service		
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Summons ID: @00001039848 CIRCUIT: 23-CI-004533 Certified Mail







Commonwealth of Kentucky David L. Nicholson, Jefferson Circuit Clerk

Received From: JOHN SPALDING Account Of: JOHN SPALDING

Case Title: ESTATE OF MARVI EDUARDO LOPEZ VASQUE Confirmation Number: 166174564

ET AL VS. NORTON IMMED Filed On 7/27/2023 5:00:30PM

<u>#</u>	Item Description		<u>Amount</u>
1	Access To Justice Fee		\$20.00
2	Money Collected For Others(Court Tech. Fee)		\$20.00
3	Money Collected For Others(Postage)		\$96.66
4	Money Collected For Others(Attorney Tax Fee)		\$5.00
5	Library Fee		\$3.00
6	Civil Filing Fee		\$150.00
7	Charges For Services(Copy - Photocopy)		\$9.60
		TOTAL:	\$304.26

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