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IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT IN AND FOR
HILLSBOROUGH COUNTY, FLORIDA, CIVIL DIVISION

Plaintiff,

vs.

CASE NO.:

DIVISION:

SUN CITY HOSPITAL INC. d/b/a SOUTH
BAY HOSPITAL

Defendant.

_____ /

COMPLAINT

Plaintiff, files this action against Defendant Sun City Hospital Inc. d/b/a South Bay Hospital (hereafter South Bay) and alleges as follows:

GENERAL ALLEGATIONS

1. This is an action for damages that exceed Fifteen Thousand dollars (\$15,000.00).
2. Plaintiff lives in Hillsborough County, Florida.
3. South Bay is a for profit corporation registered to do business in Florida that established, owns, conducts, manages, operates, and or maintains a hospital doing business at 4016 Sun City Center Blvd., Sun City Center, Fl 33573. South Bay holds the license for the hospital.
4. South Bay agreed to and did provide medical services to Plaintiff from November 23, 2007 through December 5, 2007.

5. She was living independently and performing all of her activities of daily living until she was admitted to South Bay on November 23, 2007 with complaints of nausea, generalized weakness, fatigue, headache, cognitive impairment and slurred speech.

6. As a result of her admitting condition she was evaluated as a fall risk.

7. On November 24, 2007 at 9:48 am Coriander K. Hunt, ARNP ordered that Plaintiff have assistance while out of bed.

8. On November 26, 2007 at 8:39 am physical therapy assessed Plaintiff as “patient requires supervision for out of bed...”.

9. On November 26, 2007 at 15:50 pm, case management assessed Plaintiff as confused and in need of assistance with total care and transfers.

10. On November 27, 2007 at 2000 pm nursing evaluated Plaintiff as having weakness in her legs and needing assistance to ambulate.

11. On November 27, 2007 at 2130 pm nursing gave Plaintiff two doses of nitroglycerin 5 minutes apart in response to chest pain.

12. On November 27, 2007, at approximately 2200pm nursing escorted Plaintiff to the bedside commode and left her unattended. Plaintiff was left on the bedside commode so long it was becoming uncomfortable to continue sitting. She therefore got up and attempted to return to bed without assistance.

13. While walking unassisted back to her bed, Plaintiff fell lacerating her head, breaking her hip and losing sight in one of her eyes.

12. The undersigned certifies that a reasonable investigation as permitted by the circumstances has been conducted which gives rise to a good faith belief that grounds exist for an action against each named defendant in this action.

13. All conditions precedent to the maintenance of this action have occurred been waived, or have been otherwise fulfilled.

17. South Bay has a duty to provide medical, nursing, pharmacy, and other care which, in light of all relevant surrounding circumstances, is recognized as acceptable and appropriate by reasonably prudent similar health care providers.

18. South Bay through the actions of its employees, agents, ostensible agents, apparent agents and joint venturers, was negligent in treating Plaintiff, and breached the acceptable standard of care including, but not limited to the following ways:

- a. Failing to properly monitor, supervise and assist Plaintiff on the evening of November 26, 2007.
- b. Administering SI nitroglycerin without proper follow up monitoring.
- c. Leaving Plaintiff on the bedside commode without assistance.

19. As a direct and proximate result of South Bay, their agents, servants, and or employees' actions, inactions, errors, and omissions, Plaintiff suffered bodily injury and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, the expense of hospitalization, medical care, nursing care, and other health care treatment, loss of ability to earn money, aggravation of a previously existing condition and other economic losses. Plaintiff's losses are either permanent or continuing in nature and Plaintiff will continue to suffer the losses in the future.

WHEREFORE, Plaintiff demands judgment against South Bay for damages suffered in excess of \$15,000.00, pre-judgment interest, costs, and any other relief this court deems appropriate, and demands a trial by jury on all issues.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above has been sent by U.S.

Mail on _____ to:

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