

YES
EXHIBITS

COMPLAINT HAS EXHIBITS BUT THEY WERE NOT COPIED

CASE NO. 20184006362

DATE: 6/20/2018

CASE TYPE: Medical Malpractice

PAGE COUNT: 4

CASE NOTE

IN THE CIRCUIT COURT OF COOK COUNTY
COUNTY DEPARTMENT, LAW DIVISION

PRAMODBHAI PATEL

Plaintiff,

vs.

FRANK LIAO, M.D.,

Defendant.

2018L006362
CALENDAR/ROOM R
TIME 00:00
Case No. No. Medical Malpractice

COMPLAINT AT LAW¹

NOW COMES, Plaintiff, PRAMODBHAI PATEL (hereinafter "Mr. Patel"), by and through his attorneys, DOLAN LAW OFFICES, P.C., complaining of the Defendant, FRANK LIAO, M.D. (hereinafter "Dr. Liao") and states as follows:

COUNT I
MEDICAL NEGLIGENCE VS.
FRANK LIAO, M.D.

1. That at all times relevant, Defendant Dr. Liao was a surgeon licensed to practice medicine in the State of Illinois.
2. On August 28, 2012, Mr. Patel was diagnosed by Dr. Liao with a left inguinal hernia. He was scheduled for an outpatient laparoscopic inguinal hernia repair.
3. On August 29, 2012, Mr. Patel underwent a laparoscopic left inguinal hernia repair with a large Bard 3D mesh, performed by Dr. Liao

¹ This matter was previously filed in the Circuit Court of Cook County as number 13 L 10755. It was voluntarily dismissed on July 12, 2017. This is the first refiling.

4. Following the surgical procedure Mr. Patel began to experience excess swelling, decreased appetite, difficulty ambulating, and decreased energy which he complained of to Dr. Liao between September 7, 2012 and September 25, 2012.

5. On September 18, 2012, an abdomen CT was taken of Mr. Patel which revealed air fluid levels and thick-walled fluid collection. The radiologist noted that based upon the CT it was impossible to say whether or not it represented bowel herniation and/or abscess. The radiologist recommended a repeat CT with contrast be done and discussed these findings with Dr. Liao

6. Defendant Dr. Liao did not order a repeat CT with contrast for Mr. Patel and instead instructed Mr. Patel to follow up with him in one week.

7. On September 25, 2012, during an office visit, Defendant, without a repeat CT with contrast of Mr. Patel, determined the swelling was post-op fluid collection, rather than an abscess.

8. On the night of September 25, 2012, Mr. Patel was admitted to the emergency room with a fever of 103.3 degrees. He was diagnosed with an intra-abdominal abscess and a pulmonary embolism.

9. Mr. Patel was given heparin to treat the pulmonary embolism and on September 30, 2012, suffered a large parenchymal hemorrhage in the right parietal and temporal lobes with extensive surrounding edema.

10. At all times relevant, it was the duty of Defendant Dr. Liao to exercise reasonable care in providing medical care and treatment to Plaintiff so as to not cause injury to the Plaintiff.

11. Notwithstanding the aforementioned duty Defendant Dr. Liao was guilty of one or more of the following acts or omissions:

- a. Carelessly and negligently injured Mr. Patel's colon during the surgical procedure on August 29, 2012;
- b. Carelessly and negligently failed to recognize the CT scan on September 18, 2012 indicated air fluid level which was an abscess;
- c. Carelessly and negligently and unsuccessfully attended to the plaintiff Mr. Patel by failing to address and treat his complaints of swelling, decreased energy, and decreased appetite;
- d. Carelessly and negligently failed to order a repeat abdomen CT with contrast of Mr. Patel after September 18, 2012;
- e. Carelessly and negligently failed to diagnose Mr. Patel's abscess;
- f. Was otherwise careless and negligent.

12. That as a direct and proximate result of Defendant Frank Liao, M.D.'s negligence of one or more of the aforesaid negligent acts or omissions, Plaintiff Pramodbhai Patel has had permanent and severe medical injuries, multiple hospitalizations, suffered severe pain and suffering, and disability.

13. Attached to this Complaint is a report from a Board Certified General Surgeon pursuant to 735 ILCS 5/2-622.

WHEREFORE, Plaintiff PRAMODBHAI PATEL prays for judgment against the Defendant FRANK LIAO, M.D., in such an amount in excess of Fifty Thousand Dollars (\$50,000.00) as shall be just and proper compensation for the injuries sustained, plus costs.

Martin A. Dolan, Esq.
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10 South LaSalle Street, Suite 3702
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312-676-7600
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Attorney No. 43525

Respectfully Submitted,



By: One of Plaintiff's Attorneys

Dated: June 20, 2018

5. I have concluded on the basis of the health professional's review and consultation that there is a reasonable and meritorious cause for the filing of this action.

I certify that the aforementioned facts are true and correct.

VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this affidavit are true and correct, except as to matters therein stated to be on information and belief as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

By: _____

Martin A. Dolan

State of Illinois

County of Cook



Notary Public

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