

Amended this 1st day of JULY, 2015
pursuant to the Order of
The Honourable Justice M.D. PARAYESKI
date the 22 day of JUNE, 2015
[Signature]
(Signature) Registrar, Superior Court of Justice
At Hamilton Superior Court of Justice

Court File No.

14-50128

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

SUZANNE YOUNG, CARI-ANN YOUNG
AND TERESA DI FALCO

Plaintiffs

- and -

ST. JOSEPH'S HEALTHCARE HAMILTON,
DAVID RICHARD JOHNSON SMALL, FREDERICK J. BAXTER,
NANCY DZAJA, ANNA DUL, NICHOLAS AFAGH, CATHERINE KELL,
BREANNA CORNELIUS, JOSIELYN STACEY, ANNA MARIE WALTERS,
TINA JACKSON-BEEMER, MARY MENS, DIANE GARDINER,
JOHN DOE and JANE DOE

Defendants

AMENDED
AMENDED STATEMENT OF CLAIM

TO THE DEFENDANTS:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiffs. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a Statement of Defence in Form 18A prescribed by the Rules of Civil Procedure, serve it on the plaintiff's lawyer or, where the plaintiff does not have a lawyer, serve it on the plaintiff, and file it, with proof of service, in this court office, **WITHIN TWENTY DAYS** after this statement of claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period for serving and filing your statement of defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Amended this 7 day of Apr, 2017
pursuant to the Order of
The Honourable Justice Goodman
date the 17 day of Mar, 2017
[Signature]
(Signature) Registrar, Superior Court of Justice
At Hamilton Superior Court of Justice

Instead of serving and filing a Statement of Defence, you may serve and file a Notice of Intent to Defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your Statement of Defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

Date:

Nov 5/14

Issued By:



Local Registrar

Address of Court Office:
 Superior Court of Justice
 45 Main Street East
 Suite 110
 Hamilton, Ontario
 L8N 2B7

TO: St. Joseph's Healthcare Hamilton
 50 Charlton Ave. E
 Hamilton, ON L8N 4A6

AND TO: David Richard Johnson Small
 Fourth Floor Fontbonne Building
 301 James Street South
 Hamilton ON L8P 3B6

AND TO: Frederick J. Baxter
 St. Joseph's Healthcare Hamilton
 Department of Anaesthesiology
 50 Charlton Avenue East
 Hamilton ON L8N 4A6

- AND TO: Nancy Dzaja
83 Dawson Road, Suite 210
Guelph ON N1H 1B1
- AND TO: Anna Dul
The Atrium at MIP
175 Longwood Road South, Suite 201A
Hamilton ON L8P 0A1
- AND TO: Nicholas Afagh
Postgraduate Medical Education
McMaster University
1280 Main Street West
Room MDCL - 3101A
Hamilton ON L8S 4K1
- AND TO: Catherine Kell
St. Joseph's Healthcare Hamilton
50 Charlton Ave. E
Hamilton, ON L8N 4A6
- AND TO: Breanna Cornelius
St. Joseph's Healthcare Hamilton
50 Charlton Ave. E
Hamilton, ON L8N 4A6
- AND TO: Josielyn Stacey
St. Joseph's Healthcare Hamilton
50 Charlton Ave. E
Hamilton, ON L8N 4A6
- AND TO: Anna Marie Walters
St. Joseph's Healthcare Hamilton
50 Charlton Ave. E
Hamilton, ON L8N 4A6
- AND TO: Tina Jackson-Beemer
St. Joseph's Healthcare Hamilton
50 Charlton Ave. E
Hamilton, ON L8N 4A6
- AND TO: Mary Mens
St. Joseph's Healthcare Hamilton
50 Charlton Ave. E
Hamilton, ON L8N 4A6

AND TO: Diane Gardiner
St. Joseph's Healthcare Hamilton
50 Charlton Ave. E
Hamilton, ON L8N 4A6

AND TO: John Doe

AND TO: Jane Doe

CLAIM

1. The Plaintiffs claim:
 - a. General damages for the Plaintiff, Suzanne Young, in the sum of \$4.5 \$1.7 million;
 - b. Special damages for the Plaintiff, Suzanne Young, in the sum of \$750,000.00;
 - c. Damages for the Plaintiff, Cari-Ann Young, in the sum of \$75,000.00 pursuant to the *Family Law Act*, R.S.O. 1990, as amended.
 - d. Damages for the Plaintiff, Teresa DiFalco, in the sum of \$75,000.00 pursuant to the *Family Law Act*, R.S.O. 1990, as amended.
 - e. Punitive, aggravated and exemplary damages for the Plaintiff, Suzanne Young, as against the Defendant, St. Joseph's Healthcare Hamilton, in the amount of \$100,000.00;
 - e. f. Prejudgment and postjudgment interest in accordance with the Courts of Justice Act;
 - f. g. O.H.I.P subrogated costs in an amount to be ascertained;
 - g. h. Their costs of this action on a full indemnity scale; and

h. i. Such further and other relief as this Honourable Court may deem just.

2. The Plaintiff, Suzanne Young, resides in the City of Hamilton, in the Province of Ontario.

3. The Plaintiff, Cari-Ann Young, resides in the City of Hamilton, in the Province of Ontario and is the daughter of the Plaintiff, Suzanne Young.

4. The Plaintiff, Teresa DiFalco, resides in the City of Hamilton, in the Province of Ontario and is the sister of the Plaintiff, Suzanne Young.

5. The Defendant, St. Joseph's Healthcare Hamilton, is a medical corporation/organization who at all material times herein owned and operated St. Joseph's Hospital - Charlton Campus in the City of Hamilton, in the Province of Ontario which is a public hospital operated, pursuant to the provisions of the *Public Hospitals Act* R.S.O. 1990, c.P.40, as amended, and the regulations thereunder, and was at all material times carrying on the business of a hospital, providing medical services to the general public (hereinafter referred to as the Defendant Hospital). The Defendant Hospital is responsible as a matter of fact and law for the acts and omissions of its employees, agents and representatives as more particularly described herein.

6. The Defendant, David Richard Johnson Small, is licensed to practice medicine in the Province of Ontario and at all material times was an employee, agent, afforded privileges by, and/or servant of the Defendant Hospital. The Defendant, David Richard Johnson Small was a doctor in charge of the treatment and care of the Plaintiff, Suzanne Young.

7. The Defendant, Frederick J. Baxter, is a physician licensed to practice in the Province of Ontario, and at all material times was an employee, agent, afforded privileges by and/or servant of the Defendant Hospital. The Defendant,

Frederick J. Baxter, was the anesthesiologist involved in the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

8. The Defendant, Nancy Dzaja, was a medical resident acting as an obstetrician and gynecologist, and at all material times was an employee, agent, afforded privileges by and/or servant of the Defendant Hospital. The Defendant, Nancy Dzaja was a physician involved in the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

9. The Defendant, Anna Dul, was a medical resident and a physician licensed to practice in the Province of Ontario, and at all material times was an employee, agent, afforded privileges by and/or servant of the Defendant Hospital. The Defendant, Anna Dul was a physician involved in the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

10. The Defendant, Nicholas Afagh, is a clinical clerk and licensed to practice medicine in the Province of Ontario, and at all material times, the Defendant, Nicholas Afagh was an employee, agent, afforded privileges by and/or servant of the Defendant Hospital. Nicholas Afagh was in charge of the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

11. The Defendant, Catherine Kell, is a registered nurse licensed to practice in the Province of Ontario. At all material times, the Defendant, Catherine Kell was an employee, agent and/or servant of the Defendant Hospital. The Defendant, Catherine Kell was a nurse in charge of the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

12. The Defendant, Breanna Cornelius, is a registered nurse licensed to practice in the Province of Ontario. At all material times, the Defendant, Breanna Cornelius was an employee, agent and/or servant of the Defendant Hospital. The Defendant, Breanna Cornelius, was a nurse in charge of the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

13. The Defendant, Joseilyn Stacey, is a registered nurse licensed to practice in the Province of Ontario. At all material times, the Defendant, Joseilyn Stacey was an employee, agent and/or servant of the Defendant Hospital. The Defendant, Joseilyn Stacey, was a nurse in charge of the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

14. The Defendant, Anne Marie Walters, is a registered nurse licensed to practice in the Province of Ontario. At all material times, the Defendant, Anne Marie Walters was an employee, agent and/or servant of the Defendant Hospital. The Defendant, Anne Marie Walters, was a nurse in charge of the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

15. The Defendant, Tina Jackson-Beemer, is a registered nurse licensed to practice in the Province of Ontario. At all material times, the Defendant, Tina Jackson-Beemer, was an employee, agent and/or servant of the Defendant Hospital. The Defendant, Tina Jackson-Beemer, was a nurse in charge of the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

16. The Defendant, Mary Mens, is a registered nurse licensed to practice in the Province of Ontario. At all material times, the Defendant, Mary Mens, was an employee, agent and/or servant of the Defendant Hospital. The Defendant, Mary Mens, was a nurse in charge of the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

17. The Defendant, Diane Gardiner, is a registered nurse licensed to practice in the Province of Ontario. At all material times, the Defendant, Diane Gardiner, was an employee, agent and/or servant of the Defendant Hospital. The Defendant, Diane Gardiner, was a nurse in charge of the treatment and care of the Plaintiff, Suzanne Young, whilst in the Defendant Hospital.

18. The Defendants, John Doe and Jane Doe, represent nurses, employees, physicians and other medical personnel who were employed by and/or afforded privileges and practiced medicine at the Defendant Hospital and were involved in the care of the Plaintiff, Suzanne Young, and are unknown to the Plaintiffs at the time of this pleading.

19. On or about the 26th day of November 2012, the Plaintiff, Suzanne Young, was admitted to the Defendant Hospital in the City of Hamilton, to have a total abdominal hysterectomy and bilateral salpingo oophorectomy.

20. The Plaintiffs state, and the fact is, that on November 26, 2012, the Plaintiff, Suzanne Young, underwent surgery for a abdominal hysterectomy and bilateral salpingo oophorectomy by the Defendants, David Richard Johnson Small, Frederick J. Baxter, Nancy Dzaja and Anna Dul.

21. The Plaintiffs further state that the Defendants, David Richard Johnson Small, Frederick J. Baxter, Nancy Dzaja, Anna Dul, Nicholas Afagh, Catherine Kell, Breanna Cornelius, Josielyn Stacey, Anna Marie Walters, Tina Jackson-Beemer, Mary Mens, Diane Gardiner, John Doe and Jane Doe, acted on behalf of themselves and the Defendant Hospital and acted as a team when performing the surgical procedures conducted on November 26, 2012, on the Plaintiff, Suzanne Young.

22. At all material times, the Plaintiff, Suzanne Young, was under the complete control of the Defendants, David Richard Johnson Small, Frederick J. Baxter, Nancy Dzaja, Anna Dul, Nicholas Afagh, Catherine Kell, Breanna Cornelius, Josielyn Stacey, Anna Marie Walters, Tina Jackson-Beemer, Mary Mens, Diane Gardiner, John Doe and Jane Doe, for her surgical treatment on November 26, 2012.

23. Following the surgery the Plaintiff, Suzanne Young, was admitted to the Defendant Hospital on November 26, 2012. In the evening of November 26, 2012, the Plaintiff, Suzanne Young, made a complaint to a registered nurse of a

lump on her head. The Plaintiff, Suzanne Young, was assessed by a registered nurse and a hematoma was detected.

24. The Plaintiff was also assessed by the Defendants, David Richard Johnson Small and Nancy Dzaja, on November 27, 2012, with complaints of headache, pain behind eyes, blurry vision and nausea. The Defendant, Nancy Dzaja confirmed a 3-4 cm mass in the Plaintiff, Suzanne Young's occipital region.

25. The Plaintiffs state, and the fact is, that the Plaintiff, Suzanne Young, was discharged from the Defendant Hospital on December 1, 2012.

26. Through the remainder of 2012 and into 2013, the Plaintiff, Suzanne Young, continued to be treated, assisted and monitored by the Defendant, David Richard Johnson Small, Dr. Lauren Smith, the Plaintiff's family physician, Dr. Bruno Di Paolo and CCAC. During that time the Plaintiff, Suzanne Young continued to complain of ongoing headaches, neck pain, nausea, hair loss, difficulty with balance, blurred vision, visual changes, short term memory difficulties, word finding difficulties and stuttering. As a result of these ongoing complaints the Plaintiff was referred to Dr. Michel P. Rathbone, a neurologist, who confirmed that the Plaintiff, Suzanne Young's symptoms were consistent with post concussion syndrome. The Plaintiff, Suzanne Young, was subsequently referred to the Acquired Brain Injury Clinic.

ALLEGATION OF BATTERY

27. The Plaintiffs plead that the Plaintiff, Suzanne Young, was subjected to unconsented harmful contact caused by the Defendants, David Richard Johnson Small, Frederick J. Baxter, Nancy Dzaja, Anna Dul, Nicholas Afagh, Catherine Kell, Breanna Cornelius, Josielyn Stacey, Anna Marie Walters, Tina Jackson-Beemer, Mary Mens, Diane Gardiner, John Doe and Jane Doe, before, during or after the subject surgery resulting in a head injury. The Plaintiffs plead that the activities by the Defendants amount to battery.

ALLEGATIONS OF NEGLIGENCE

28. The Plaintiffs plead that the Plaintiff, Suzanne Young' injuries and damages were caused by the negligence, breach of duty and malpractice of the Defendants, particulars of which are as follows:

AS TO THE NEGLIGENCE OF THE DEFENDANT HOSPITAL, ITS AGENTS AND/OR SERVANTS:

- a. It failed to have a proper system in place to ensure that surgical procedures were conducted with proper care and without negligence;
- b. It failed to have a proper system in place to ensure proper transfers of patients before, during and after surgical procedures;
- c. It failed to have a proper system in place to ensure that patient's conditions were properly monitored and recorded before, during and after surgery and following admission to the Defendant Hospital;
- d. It failed to ensure that there was proper and experienced staff available at all times to monitor the care and treatment of the Plaintiff, Suzanne Young;
- e. It failed to provide proper and safe surgical facilities, equipment and staff needed for the purpose of conducting the treatment and/or care of the Plaintiff, Suzanne Young;
- f. It failed to have a system to ensure that surgical procedures were conducted with proper care and without negligence;
- g. It failed to take the appropriate steps to ensure that the Defendants, David Richard Johnson Small, Frederick J. Baxter, Nancy Dzaja, Anna Dul, Nicholas Afagh, Catherine Kell, Breanna Cornelius, Josielyn Stacey, Anna Marie Walters, Tina Jackson-Beemer, Mary Mens, Diane Gardiner, John Doe and Jane Doe has the appropriate knowledge and experience before it allowed them to treat and/or care for the Plaintiff, Suzanne Young;

- h. It failed to provide and maintain proper hospital procedures and standards for care and treatment of its patients;
- i. It allowed physicians and/or nurses with inadequate training to provide services in its hospital as members of their medical staff;
- j. It failed to train and ensure that the knowledge and skill of the physicians and nurses responsible for the care of the patients at the hospital and the physicians and nurses responsible for the performing of the relevant surgical procedures was proper and adequate;
- k. It employed incompetent or untrained staff including residents, doctors, nurses, anesthesiologists who were not capable of assessing the needs of the plaintiff, Suzanne Young, and had insufficient training to make or assist in the medical judgment to proceed;
- l. The staff who were assisting the Defendants, David Richard Johnson Small, Frederick J. Baxter, Nancy Dzaja and Anna Dul were part of a team of people with various responsibilities to ensure that accurate and timely information was provided to the physician in charge of the Plaintiff, Suzanne Young's care, and in this case the team failed to note the head injury suffered during the surgery;
- m. It failed to have appropriate and necessary facilities for the surgery to be performed on the Plaintiff, Suzanne Young;
- n. It failed to ensure that its agents, servants and/or employees exercised adequate care, when they knew, or ought to have known, a hazard existed;
- o. It failed to ensure that there were a sufficient number of agents, servants and/or employees before during and after the subject surgery, when they knew, or ought to have known, that this lack of staff would result in a dangerous situation and hazard to the Plaintiff, Suzanne Young;
- p. It failed to provide appropriate training and supervision of its agents, servants and/or employees with respect to appropriate monitoring, lifting and transferring techniques, safety precautions, apparatus and

safety equipment needed when monitoring, lifting and transferring the Plaintiff, Suzanne Young; and

- q. Such further and other particulars as counsel may advise and this Honourable Court may permit.

AS TO THE NEGLIGENCE OF THE DEFENDANTS, DAVID RICHARD JOHNSON SMALL, FREDERICK J. BAXTER, NANCY DZAJA, ANNA DUL, NICHOLAS AFAGH, CATHERINE KELL, BREANNA CORNELIUS, JOSIELYN STACEY, ANNA MARIE WALTERS, TINA JACKSON-BEEMER, MARY MENS, DIANE GARDINER, JOHN DOE AND JANE DOE:

- a. They did not perform a proper abdominal hysterectomy and bilateral salpingo oophorectomy;
- b. They did not ensure that appropriate procedures were followed to ensure that the subject surgery was conducted with proper care and without negligence;
- c. They failed to ensure that appropriate procedures were taken to ensure the proper transfer of the Plaintiff, Suzanne Young, before, during and after the subject surgical procedure;
- d. They failed to ensure that the Plaintiff, Suzanne Young, was properly placed and secured before during and after the subject surgical procedure;
- e. They failed to have ensure that appropriate procedures were followed to ensure that the Plaintiff, Suzanne Young's condition was properly monitored and recorded before, during and after surgery, and following admission to the Defendant Hospital;
- f. They failed to ensure that there was someone monitoring the Plaintiff, Suzanne Young, at all material times;
- g. They failed to ensure that appropriate levels of anesthesia were administered;

- h. They failed to provide a proper and safe surgical environment for the Plaintiff, Suzanne Young;
- i. They did not conduct proper follow-up medical examinations;
- j. They did not properly diagnose the symptoms suffered by the Plaintiff, Suzanne Young;
- k. On the occasion in question, they were incompetent and lacking the reasonable skill, ability and self-command necessary for the treatment and/or care of the Plaintiff, Suzanne Young;
- l. They failed to use reasonable care when examining, diagnosing and treating the Plaintiff, Suzanne Young;
- m. They did not provide for proper medical follow-up of the Plaintiff, Suzanne Young, following discharge from hospital;
- n. They failed to obtain a consultation from a neurologist regarding the condition of the Plaintiff, Suzanne Young;
- o. They failed to ensure that when the Plaintiff, Suzanne Young, was in their care, that equipment that was used was reliable, effective and appropriate for the surgical procedure;
- p. On November 26, 2012 and thereafter they did not perform medical procedures to the necessary skill, care and attention that would be expected of a medical physician and/or nurse;
- q. They failed to make prompt and appropriate use of clinical aids that were made available to them;
- r. They failed to provide the Plaintiff, Suzanne Young, with a reasonable standard of medical care under the circumstances;
- s. They failed to ensure that they exercised adequate care, when they knew, or ought to have known, a injury hazard existed;
- t. They failed to ensure that there were a sufficient number doctors, and nurses present, when they knew, or ought to have known, that this lack of staff would result in a dangerous situation and hazard to the Plaintiff, Suzanne Young;

- u. They failed to follow appropriate monitoring, lifting and transferring techniques and safety precautions, and failed to use the appropriate apparatus and safety equipment needed when monitoring, lifting and transferring the Plaintiff, Suzanne Young; and
- v. Such further and other particulars as counsel may advise and this Honourable Court may permit.

29. The Plaintiffs plead and rely upon the doctrine of *res ipsa loquitur*.

30. As a result of the negligence of the Defendants, the Plaintiff, Suzanne Young, has sustained health difficulties requiring her to seek the attention of physicians, surgeons and physiotherapists. This Plaintiff's physical and psychological complaints include: post concussion syndrome, occipital neuralgia, headaches, dizziness, nausea, vomiting, head contusion, neck pain, blurred vision, photophobia, impairment of balance, sensitivity to sounds and smells, short term memory and concentration difficulties, sleep problems, fatigue, mood changes, emotional and psychological trauma, word finding difficulties, stuttering, nightmares and sleep disturbance, anxiety, nervousness, depression and post-traumatic stress syndrome, adjustment disorder, considerable pain and suffering and will continue to experience pain and suffering in the future; loss of enjoyment of life, loss of independence, and will continue to suffer from loss of enjoyment of life and loss of independence in the future.

31. The Plaintiff, Suzanne Young, states that as a result of the negligence of the Defendants, she has suffered a loss of income up to the time of trial and will continue to suffer a loss of income into the future.

32. The Plaintiff, Suzanne Young, states that as a result of the negligence of the Defendants, she has suffered a loss of competitive advantage, and will continue to suffer such a loss into the future.

33. The Plaintiff, Suzanne Young, states that as a result of the negligence of the Defendants, she has suffered a decrease in her employability, and will continue to suffer such a loss into the future.

34. The Plaintiff, Suzanne Young, states and the fact is that as a result of the injuries suffered in the motor vehicle accident, the Plaintiff, Suzanne Young, has had a loss of homemaking/handy person capacity. The Plaintiff, Suzanne Young, further states that she will continue to have a loss of homemaking/handy person capacity into the future.

35. The Plaintiff, Suzanne Young, states and the fact is that she is entitled to recover cost of care to date of trial and future cost of care items.

36. By reason of the negligence of the Defendants, the Plaintiff, Suzanne Young, has been put to the following known out-of-pocket expenses and losses to date:

Loss of income for the Plaintiff, Suzanne Young:	Unknown
Out-of-Pocket expenses for the Plaintiff, Suzanne Young:	Unknown
OHIP Subrogated Claim for the Plaintiff, Suzanne Young:	Unknown

37. Under the provisions of the Family Law Act, R.S.O. 1990, c. F.3 and amendments thereto, the Plaintiffs, Cari-Ann Young and Teresa DiFalco, claim damages including:

- a. Actual out-of-pocket expenses reasonably incurred for the benefit of the Plaintiff, Suzanne Young;
- b. A reasonable allowance for travel expenses actually incurred in visiting the Plaintiff, Suzanne Young during her treatment and recovery;

- c. A reasonable allowance for loss of income and the value of nursing, housekeeping, and other services provided for the Plaintiff, Suzanne Young; and
- d. An amount to compensate for loss of guidance, care and companionship that each might reasonably have expected to receive from the Plaintiff, Suzanne Young, had the accident and resulting injuries not occurred.

37.1 The Plaintiff, Suzanne Young, further claims that the conduct of the Defendant Hospital in general, is reprehensible and should be deterred and she is therefore entitled to aggravated, punitive and exemplary damages.

38. The Plaintiffs plead and rely upon the provisions of the following statutes, as amended from time to time:

- a. Public Hospital Act, R.S.O. 1990, c.P.40;
- b. The Negligence Act, R.S.O. 1990, c. N. 1; and
- c. The Family Law Act, R.S.O. 1990, c. F. 3.

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LAWYER FOR THE PLAINTIFFS

SUSANNE YOUNG et al
Plaintiffs

and
ST. JOSEPH'S HEALTHCARE HAMILTON et al
Defendants

Court File No.

14-5028

**ONTARIO
SUPERIOR COURT OF JUSTICE**

**ACTION COMMENCED IN THE CITY OF
HAMILTON**

**AMENDED ~~AMENDED~~
STATEMENT OF CLAIM**

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