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FILED
JUL 12 1984
HOWARD HANSON
MARIN COUNTY CLERK
BY DEPUTY J. POSEY

SUPERIOR COURT OF CALIFORNIA
COUNTY OF MARIN

ADAM LONDON,
Plaintiff,

By TRUDIE LONDON,
his Guardian Ad Litem,

-vs-

MARK GLASSER,
an individual,
KAISER FOUNDATION HOSPITALS,
a corporation,
THE PERMANENTE MEDICAL GROUP,
a corporation, and
DOES 1 through 50
Defendants.

No. **118799**
COMPLAINT FOR
DAMAGES FOR
WILLFUL TORTS
(Battery) [CC 3333];
(False Imprisonment) [CC 3294]
(Child Abuse) [H&S 11165]
(Willful Cruelty) [H&S 11165,
PC 273a(1) and [PC 273a(2)]
(Inflicting Pain) [PC 273d]
(Kidnapping) [PC 207]
(Mayhem) [PC 203]

Plaintiff alleges:

PLAINTIFF'S
EXHIBIT
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FIRST CAUSE OF ACTION

COMMON LAW BATTERY

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4 1. Plaintiff Adam London is a minor, residing in the County of
5 Marin, State of California.
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7 2. TRUDIE LONDON is the Guardian ad Litem for Adam London.

8 3. Mark Glasser is an individual, residing in the County of
9 Marin, State of California, hereinafter referred to as
10 "Glasser," and is an employee of Pemanente Medical Group.

11 4. The Kaiser Foundation Hospitals, hereinafter referred to as
12 "Kaiser," and The Permanente Medical Group, hereinafter
13 referred to as "Permanente," are corporations doing business
14 in the County of Marin, State of California, specifically at
15 the location commonly known as the Kaiser-Permanente Medical
16 Center, 99 Montecillo Road, San Rafael, California.

17
18 5. All of the acts, occurrences and transactions herein
19 mentioned took place within the County of Marin.

20
21 6. Plaintiff is ignorant of the true names and capacities of
22 defendants sued herein as DOES 1-50, inclusive, and therefore
23 sues these defendants by such fictitious names. Plaintiff
24 will amend this Complaint to allege their true names and
25 capacities when ascertained. Plaintiff is informed and
26 believes and thereon alleges that each of the fictitiously
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1 named defendants is responsible in some manner for the
2 occurrences herein alleged, and that plaintiff's injuries as
3 herein alleged were proximately caused by their conduct.

4 7. Defendants Doe 1 through Doe 50, and each of them, were
5 acting in concert and at all times herein mentioned were the
6 agents and employees of their codefendants Glasser, Kaiser and
7 Permanente.

8 8. The Guardian ad Litem is informed and believes and thereon
9 alleges that on or about August 5, 1983, each of the
10 fictitiously named defendants, together with Glasser, Kaiser
11 and Permanente, acting in concert with each other and
12 individually, jointly and concurrently, without the knowledge
13 and consent of plaintiff, forcibly removed the foreskin from
14 plaintiff's penis by cutting the foreskin completely off.

15
16 10. By reason of the wrongful and malicious acts of
17 defendants, and each of them, and of the fright caused
18 plaintiff, plaintiff has suffered extreme and severe mental
19 anguish and physical pain and has been injured in mind and
20 body, all to plaintiff's damage in an amount which the law of
21 the State of California prohibits Plaintiff from stating
22 unless defendants, or any of them, request Plaintiff to so
23 state, in that Plaintiff was:

24 (a) Was temporarily unable to eat normally.
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(b) Was temporarily unable to sleep normally.

(c) Bled from the penis at the time of the unmerciful attack and thereafter.

(d) Does now, and always in the future will, suffer a permanent mutilation of the penis.

(e) Does now, and always in the future will, suffer from the removal of the natural protection afforded by the foreskin.

(f) Does now, and always in the future will, suffer permanent scarring of the penis.

(g) Does now, and always in the future will, suffer cosmetically because plaintiff's penis is abnormal in appearance when compared with persons who have not had their sexual organs altered.

(h) Does now, and always in the future will, suffer a permanently disfigured penis.

(i) Does now, and always in the future will, suffer permanent loss of sensitivity resulting from defendants cutting away nerve endings which were a part of the foreskin.

11. The inhuman acts aforementioned committed by defendants

1 were done, committed and caused by defendants with malice and
2 ill will, with the intent and design of mutilating,
3 disfiguring, injuring, desensitizing, physically altering and
4 oppressing plaintiff, with defendants, and each of them,
5 knowing full well that removal of the foreskin had no medical
6 basis and that the forcible removal of the foreskin by
7 defendants was for done for traditional, cultural, and
8 religious reasons unrelated to medicine and for that reason
9 plaintiff is entitled to and asks exemplary and punitive
10 damages in a amount which the law of the State of California
11 prohibits Plaintiff from stating unless defendants, or any of
12 them, request Plaintiff to so state.

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14 SECOND CAUSE OF ACTION

15 VIOLATION OF WILLFUL CRUELTY STATUTE

16 [Penal Code 273a]

17
18 12. Plaintiff incorporates by reference the same as set out in
19 full at this point Paragraphs 1 through 12 inclusive.

20 13. Defendants, and each of them, committed a tort of
21 willfully inflicting unjustifiable physical pain upon
22 plaintiff in violation of California Penal Code Section 273a.

23
24 14. Plaintiff is within that class of persons intended to be
25 protected by said statute. Defendants, and each of them,

1 violated their duty to Plaintiff under California Civil Code
2 Section 1708 and Plaintiff is entitled to compensation for
3 said acts under California Civil Code Sections 3281 et seq.,
4 3520 and 3523.

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7 THIRD CAUSE OF ACTION

8 VIOLATION OF INFLECTION OF PAIN STATUTE

9 [Penal Code 273d]

10 15. Plaintiff incorporates by reference the same as set out in
11 full at this point Paragraphs 1 through 12 inclusive.

12 16. Defendants, and each of them, committed a tort of
13 willfully inflicting unjustifiable physical pain upon
14 plaintiff in violation of California Penal Code Section 273d.

15
16 17. Plaintiff is within that class of persons intended to be
17 protected by said statute. Defendants, and each of them,
18 violated their duty to Plaintiff under California Civil Code
19 Section 1708 and Plaintiff is entitled to compensation for
20 said acts under California Civil Code Sections 3281 et seq.,
21 3520 and 3523.

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24 FOURTH CAUSE OF ACTION

25 VIOLATION OF WILLFUL CRUELTY STATUTE

[Health and Safety Code 11165, Penal Code Section 273a(1)
and Penal Code Section 273a(2)]

18. Plaintiff incorporates by reference the same as set out in full at this point Paragraphs 1 through 12 inclusive.

19. Defendants, and each of them, committed a tort of willfully inflicting unjustifiable physical pain upon plaintiff in violation of California Health and Safety Code, Section 11165, subparagraph (c), subsection (2), sub-subsection (d), in violation of Penal Code Section 273a, sub-section (1) and Penal Code Section 273a, sub-section (2).

20. Plaintiff is within that class of persons intended to be protected by said statutes. Defendants, and each of them, violated their duty to Plaintiff under California Civil Code Section 1708 and Plaintiff is entitled to compensation for said acts under California Civil Code Sections 3281 et seq., 3520 and 3523.

FIFTH CAUSE OF ACTION

VIOLATION OF CHILD ABUSE STATUTE

[Health and Safety Code 11165]

21. Plaintiff incorporates by reference the same as set out in full at this point Paragraphs 1 through 12 inclusive.

1 for defendant Glasser to accomplish while at the same time
2 preventing Plaintiff from defending himself in any manner
3 whatsoever.

4 26. Said act of false imprisonment was done at
5 Kaiser-Permanente Medical Center, 99 Montecillo Road, San
6 Rafael, California, with the full knowledge and consent of the
7 officials of said 99 Montecillo Road, San Rafael, California;
8 and, further, 99 Montecillo Road, San Rafael, California,
9 provided the room, the circumstraint, the necessary supporting
10 personnel, the instruments used to commit mayhem upon the body
11 of plaintiff and further provided the bandages and dressings
12 used to cover and dress the wound after the attack.
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15 SEVENTH CAUSE OF ACTION
16 VIOLATION OF KIDNAPPING STATUTE

17 [Penal Code 207]

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19 27. Plaintiff incorporates by reference the same as set out in
20 full at this point Paragraphs 1 through 12 inclusive.

21 28. Defendants, and each of them, committed a tort of
22 willfully taking and carrying plaintiff from one location in
23 the Kaiser-Permanente Medical Center, 99 Montecillo Road, San
24 Rafael, California, to another location within the
25 Kaiser-Permanente Medical Center, 99 Montecillo Road, San
26

1 22. Defendants, and each of them, committed a tort of
2 willfully inflicting unjustifiable physical pain upon
3 plaintiff in violation of California Health and Safety Code,
4 Section 11165, subparagraph (g).

5 23. Plaintiff is within that class of persons intended to be
6 protected by said statute. Defendants, and each of them,
7 violated their duty to Plaintiff under California Civil Code
8 Section 1708 and Plaintiff is entitled to compensation for
9 said acts under California Civil Code Sections 3281 et seq.,
10 3520 and 3523.
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12 SIXTH CAUSE OF ACTION

13 FALSE IMPRISONMENT

14 [CC 3294, 3333]
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17 24. Plaintiff incorporates by reference the same as set out in
18 full at this point Paragraphs 1 through 12 inclusive.

19 25. On or about August 5, 1983, defendant Glasser seized
20 plaintiff and forcibly, against plaintiff's will, without his
21 consent, and over his crying protest, immobilized plaintiff by
22 forcibly strapping plaintiff's legs and arms in a
23 circumstraint, depriving plaintiff of leverage, elevating
24 plaintiff's hips, and exposing plaintiff's genitalia in such a
25 position as to make the mutilation of plaintiff's penis easier
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1 Rafael, California for the sole purpose of committing mayhem
2 and mutilation of the body of plaintiff in violation of
3 California Penal Code Section 207.

4 29. Plaintiff is within that class of persons intended to be
5 protected by said statute. Defendants, and each of them,
6 violated their duty to Plaintiff under California Civil Code
7 Section 1708 and Plaintiff is entitled to compensation for
8 said acts under California Civil Code Sections 3281 et seq.,
9 3520 and 3523.
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12 EIGHTH CAUSE OF ACTION
13 VIOLATION OF MAYHEM STATUTE
14 [Penal Code 203]
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16 30. Plaintiff incorporates by reference the same as set out in
17 full at this point Paragraphs 1 through 12 inclusive.

18 31. Defendants, and each of them, committed a tort by
19 willfully, unlawfully and maliciously depriving plaintiff of
20 his foreskin and of permanently disfiguring plaintiff's penis
21 in violation of California Penal Code Section 203.
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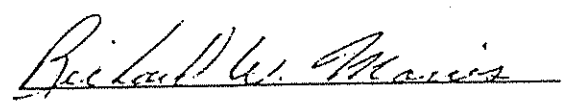
23 32. Plaintiff is within that class of persons intended to be
24 protected by said statute. Defendants, and each of them,
25 violated their duty to Plaintiff under California Civil Code
26 Section 1708 and Plaintiff is entitled to compensation for
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said acts under California Civil Code Sections 3281 et seq.,
3520 and 3523.

WHEREFORE, Plaintiff demands judgment against defendants, and
each of them, jointly and severally, as follows:

1. For general damages in a sum which is within the
jurisdiction of the Superior Court but which Plaintiff is
prohibited from stating by Code of Civil Procedure Section
425.10.
2. For medical and related expenses according to proof.
3. For punitive damages in a sum which is within the
jurisdiction of the Superior Court but which Plaintiff is
prohibited from stating by Code of Civil Procedure Section
425.10.
4. For costs of suit herein incurred.
5. For such other and further relief as the court may deem
proper.



RICHARD W. MORRIS
Attorney for Plaintiff

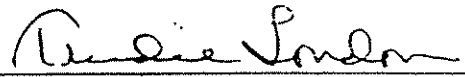
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VERIFICATION

I, Trudie London, am the natural parent and guardian ad litem in this proceeding for Adam London, a minor, plaintiff. I have read the foregoing complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 11, 1954, in the City of San Rafael, State of California.


TRUDIE LONDON