

Your claim can be filed electronically on KCC's website at <https://epoc.kccllc.net/Tehum>.

ID: 25840011

PIN: xny2TknW

**Fill in this information to identify the case:**

Debtor Tehum Care Services, Inc.  
 United States Bankruptcy Court for the Southern District of Texas  
 Case number 23-90086

**Official Form 410  
 Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

**Part 1: Identify the Claim**

NameID: 15193285

1. Who is the current creditor? Bahir Bell  
 Name of the current creditor (the person or entity to be paid for this claim)  
 Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?  No  
 Yes. From whom? \_\_\_\_\_

<p>3. Where should notices and payments to the creditor be sent?</p> <p>Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)</p> <p><b>RECEIVED</b></p> <p><b>JUN 14 2023</b></p>	<p>Where should notices to the creditor be sent?</p> <p><u>Bahir Bell</u>  <u>Atty Reginald Allen</u>  <u>7601 Crittenden St., Unit F-12</u>  <u>Philadelphia, PA 19118</u></p> <p>Address _____                  Contact phone _____                  Contact email _____</p>	<p>Where should payments to the creditor be sent? (if different)</p> <p>Name _____                  Number Street _____                  City State ZIP Code _____                  Country _____                  Contact phone _____                  Contact email _____</p>
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Uniform claim identifier for electronic payments in chapter 13 (if you use one):  
 \_\_\_\_\_

4. Does this claim amend one already filed?  No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?  No  
 Yes. Who made the earlier filing? \_\_\_\_\_

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**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 8853

7. How much is the claim? \$ 60,000.00. Does this amount include interest or other charges?  
 No  
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.  
Personal injury/denial of adequate medical treatment

9. Is all or part of the claim secured?  No  
 Yes. The claim is secured by a lien on property.  
**Nature of property:**  
 Real estate: If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_  
**Basis for perfection:** \_\_\_\_\_  
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amount should match the amount in line 7.)  
**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
 Fixed  
 Variable

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JUN 14 2023

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10. Is this claim based on a lease?  No  
 Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  
 Yes. Identify the property: \_\_\_\_\_



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ \_\_\_\_\_

Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ \_\_\_\_\_

Wages, salaries, or commissions (up to \$15,150\* earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4). \$ \_\_\_\_\_

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ \_\_\_\_\_

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ \_\_\_\_\_

Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies. \$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

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

Executed on date 6 5 2023  
MM / DD / YYYY

Reginald Allen  
Signature

Print the name of the person who is completing and signing this claim:

Name Reginald Conner Allen  
First name Middle name Last name

Title Attorney

Company Law Office of Reginald Allen  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 7601 Crittenden Street, F-12  
Number Street

City Philadelphia State PA ZIP Code 19118 Country Philadelphia

Contact phone (215) 264-5120 Email reginald.allen@comcast.net  
reginald.allen@comcast.net

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REGINALD ALLEN, ESQUIRE  
7601 CRITTENDEN STREET, UNIT F12  
PHILADELPHIA, PA 19118  
(215) 242-3875/ FAX (267) 323-2037  
EMAIL: reginald.allen08@comcast.net

ADMITTED PA BAR 1995

June 6, 2023

Tehum Care Services, Inc.  
Claims Processing Center  
c/o KCC  
222 N. Pacific Coast Hwy., Ste. 300  
El Segundo, CA 90245

Re: TEHUM CARE SERVICES, INC.; Case No. 23-90086; IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS HOUSTON DIVISION; Proof of Claim of Bahir Bell

Dear Sir or Madam:

I am legal counsel for a creditor in the above referenced matter, Mr. Bahir Bell. Enclosed is his Proof of Claim form. Also enclosed is Mr. Bell's Second Amended Complaint which is filed in the United States District Court for the Eastern District of Pennsylvania at Civil Action No. 21-03852. The Second Amended Complaint summarizes Mr. Bell's claims that he was denied adequate medical care by "Corizone" and his damages. Please feel free to contact me at (215) 264-5120/(215) 242-3875 or my email indicated above if you have any questions or require any more information about Mr. Bell's claim.

Yours truly,

  
Reginald Allen, Esquire

CC: Mr. Bahir Bell  
Anthony Arechavala, Esquire

Enclosure

IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

---

BAHIR BELL : CIVIL ACTION NO. 21-03852  
710 S. 49<sup>TH</sup> STREET :  
PHILADELPHIA, PA 19143 : JURY TRIAL DEMANDED  
:  
THE CITY OF PHILADELPHIA :  
C/O City of Philadelphia Law :  
Dept. :  
1515 Arch Street, 14<sup>th</sup> Floor :  
Philadelphia, PA 19102 :  
AND :  
CORIZONE HEALTH :  
8001 STATE ROAD :  
PHILADELPHIA, PA 19136 :  
AND :  
CURRENTLY UNKNOWN AND :  
UNNAMED CITY OF PHILADELPHIA :  
EMPLOYEES :  
OF THE DEPARTMENT OF :  
CORRECTIONS :  
C/O of the City of Philadelphia :  
Law Dept. :  
1515 Arch Street, 14<sup>th</sup> Floor :  
Philadelphia, PA 19102 :  
:  
AND :  
DR. LALITHA TRIVIKRAM, :  
MS. GATU, MR. MORENO AND :  
RN MARY DUFFY :  
8201 STATE ROAD :  
PHILADELPHIA, PA 19136 :

## SECOND AMENDED COMPLAINT

### JURISDICTION

1. This action is brought pursuant to 42 U.S.C. S 1983. It is also brought pursuant to the Americans with Disabilities Act (ADA) and the Americans with Disabilities Act as Amended (ADAA). Federal jurisdiction is based on 28 U.S.C. S 1331 and 1343 (1) (3) (4) and the aforementioned statutory provisions. Plaintiff further invokes the supplemental jurisdiction of this Court to hear and adjudicate state law claims pursuant to 28 U.S.C. S 1367 (a) to hear and adjudicate state law claims.

### PARTIES

2. Plaintiff Bahir Bell is an adult citizen and resident of Philadelphia, PA and he has an address as indicated in the caption above.

3. Defendant the City of Philadelphia is a municipality of the Commonwealth of Pennsylvania and owns and operates, manages, directs and controls the Philadelphia Department of Corrections, which employees the currently unknown and unnamed defendant employees of the Philadelphia Department of Corrections, and has an address as indicated in the caption above; at all times relevant to this action, the currently unknown and unnamed City of Philadelphia

employees of the Philadelphia Department of Corrections were acting under color of state law, and they are being sued in their respective individual capacities.

4. Defendant Corizone Health, is a private business that provides health care Services, for defendant the City of Philadelphia for prisoners at its prisons in Philadelphia, and it has an address indicated in the address below; Dr. Lalitha Trivikram, Ms. Gatu, Mr. Moreno and RN Mary Duffy are all present of former Corizone Health employees, including physicians and other medical personnel who are being sued in their respective individual capacities and they have addresses as indicated in the caption above; Based on Corizone Health's contractual relationship with the City of Philadelphia, it and its employees were acting under acting under color of state law.

#### FACTUAL ALLEGATONS

5. After being arrested, plaintiff Bahir Bell (plaintiff) was incarcerated at the City of Philadelphia prison, CFCF on August 29, 2019; plaintiff had previously been incarcerated at a prior time, and defendant the City of Philadelphia (and CFCF) had his medical history on file based on that previous incarceration; additionally, plaintiff's medical history and disability information was taken by prison personnel upon his incarceration on August 29, 2019.

6. Plaintiff's medical history includes but is not limited to the following: that he suffers from diabetes, sleep apnea and obesity; as a result of sleep apnea, plaintiff was/is prone to be startled while sleeping, which could cause him to move unpredictably – he was at high risk to fall out of bed, which all defendants knew, or should have known, if not for reckless disregard for his disabilities, their respective symptoms and their respective effects on plaintiff's health.

7. Due to plaintiff's obesity (close to three hundred pounds), it was extremely hard for him to for him to climb up to an elevated bunk and down from it.

8. Upon his arrival at CFCF, plaintiff was assigned to a cell with three other people, and he was assigned a top bunk; there was no ladder to climb up and down from the bunk bed.

9. While attempting to come down from his bunk on August 29, 2019, plaintiff's hand became caught in a whole or opening in the bed, and he forcibly fell to the floor, injuring his left hand, more specifically his left pinky finger.

10. Plaintiff was not given a CPAP machine for his sleep apnea, which caused him difficulty breathing, and also caused him emotional distress about the possible effects of his sleep apnea without a CPAP machine.

11. On August 29, 2019, plaintiff went to the infirmary at Corizone Health



(Corizone) which is located inside of CFCF as a result of the injury to his hand/pinky finger – Corizone employees wrapped his hand with two wooden sticks and offered him a generic over the counter pain reliever – plaintiff declined the pain reliever, because he already had ibuprofen in his cell; upon a reasonable medical examination, it was evident that plaintiff's left pinky finger was broken, and X-rays should have been ordered on the finger immediately, however they were not, and plaintiff was in extreme pain (plaintiff believes that two or the personnel who treated him, from Corizone were a Ms. Moreno and a Ms. Gay).

12. Plaintiff pointed out to Corizone personnel, that his left pinky finger was the site of his injury and the source of his pain, which should have reasonably led to other measures to secure and stabilize the finger, including casting it; a properly performed X-ray would have revealed plaintiff's broken pinky finger (however no such properly conducted x-ray was done).

13. Plaintiff complained to CFCF correctional officers about the lack of medical treatment that he received, and they advised him to file a grievance.

14. According to a partial medical record on September 4, 2019, plaintiff requested a bottom bunk through Corizone and/or CFCF, and it was documented in plaintiff's records that he had diabetes, sleep apnea, a broken finger – left pinky

defendants Corizone and/or CFCF (his left pinky finger).

20. In early September 2019, plaintiff filed a Philadelphia Department of Prisons Inmate Grievance Form (grievance form) complaining about the lack of proper medical treatment he received for his pinky finger, as well as not being assigned a lower level bunk based on his disabilities.

21. On September 20, 2019 plaintiff completed a Philadelphia Department of Prisons Sick Call Request (Sick Call Request) in which he complained again about not receiving a lower level bunk, which he cited he had received in the past; he cited his obesity, diabetes and sleep apnea, as well as the injury he sustained from falling from his top bunk, as an additional rationale for needing a lower level bunk; plaintiff also indicated that he had made numerous previous requests for a bottom bunk and had not been reasonably accommodated.

22. On September 22, 2019, plaintiff completed another Sick Call Request in which he requested a copy of any X-ray report that existed for his pinky finger, as he had not been informed of any results thereof as of that time; plaintiff also complained that he was not receiving adequate treatment for his finger/hand and requested that the finger be wrapped up.

23. Plaintiff specified to Corizone and CFCF that the X-ray needed to be on his

– and that he as requesting an X-ray (paraphrased).

15. According to the same note, plaintiff was prescribed ibuprofen, muscle rub cream, education, and an X-ray; it was also noted that plaintiff had an ear issue and reference was made to a bottom bunk.

16. According to the same note referenced in paragraph 15 above, on September 5, 2019, an X-ray was completed on the left hand – however there was no reference to the X-ray being isolated to plaintiff left pinky finger.

17. According to the same note as referenced in paragraph 16 above, on September 5, 2019, either Corizone or CFCF documented that the X-ray did not reveal an “acute fracture”.

18. According to the same note referenced in paragraph 16 above, on September 12, 2019, plaintiff was prescribed ibuprofen, 600 milligrams to be taken twice daily for 7 days, presumably the last treatment that plaintiff received for his hand/pinky.

19. After September 5, 2019 and September 12, 2019, plaintiff’ s finger was extremely painful, he believed it was broken despite the alleged negative X-ray – plaintiff did not even believe that an X-ray was done on his finger or at least one that captured the site of his pain, which he had specifically revealed to

left pinky finger, the site of the injury and his pain, and he showed them that the finger was bent, and in his opinion, broken.

24. Upon reasonable belief, either Corizone failed to do an X-ray for plaintiff, or it recklessly failed to isolate an X-ray of his left pinky finger, improperly performing the procedure, despite the fact that it was evident that the left pinky was bent and injured, and was likely broken.

25. Plaintiff showed his hand to several CFCF correctional officers who observed that his pinky was bent, as if broken, the hand was extremely swollen; several of those correctional officers told him that the finger looked broken.

26. Corizone insisted that plaintiff's hand/pinky finger was not broken; all defendants, Dr. Lalitha Trivikram, Ms. Gatu, Mr. Moreno and RN Mary Duffy knew or reasonably should have known that the plaintiff's finger was broken, refused to place it in a cast, and deliberately or with reckless indifference provided substandard medical treatment.

27. Plaintiff experienced severe pain in his pinky finger and hand during the remainder of his incarceration, until he was released on October 25, 2019.

28. On October 28, 2019, plaintiff sought medical treatment at Mercy Hospital in Philadelphia, which referred him to a hand specialist, Dr. Steinberg.

29. Mercy Hospital diagnosed plaintiff with a “Tendon Rupture, Finger” , a broken finger, which was based on X-ray results.

30. There was no intervening event from plaintiff’s fall from his prison bunk on August 29, 2019, and his diagnosis of a broken left pinky finger on October 28, 2019.

31. Plaintiff’s left pinky finger was placed in a cast.

32. Since October 28, 2019, plaintiff has received extensive treatment for his injured finger, including having it stabilized in a fiberglass cast, physical therapy, pain medication management, and consideration of surgery; plaintiff has continued to suffer pain in the finger since he fell on August 29, 2019.

33. Plaintiff’s left pinky finger is deformed – it bent forward at the joint, which is obviously noticeable; he has been informed that the only likely way to get rid of the deformity would be by surgery, however surgery would require that the finger be straightened and thereafter, plaintiff would not be able to bend it forever.

34. Plaintiff’s pinky finger injury has resulted in a limitation on his ability to perform daily tasks and activities involving his hand without pain, including physical labor; plaintiff is unable to perform any substantial physical labor, the only work that he is qualified for.

38. Plaintiff incorporates paragraphs 1-37 above as though fully set forth herein.

39. All of the defendants, including the City of Philadelphia, and its currently unknown and unnamed employees and Corizone Health and its employees named in the caption above were deliberately indifferent to plaintiff's need for medical treatment for his broken finger, including but not limited to; the CFCF Warden ignoring plaintiff's complaint that he had received improper medical treatment for the broken finger, that persisted during his incarceration until he was released on October 25, 2019; the refusal of or reckless examination of plaintiff's injury; the refusal or reckless performance of an X-ray; the refusal or reckless indifference to plaintiff's complaints after September 5, 2019, that his finger was still in extreme pain and that he did not believe that it had either been given an X-ray, or that any X-ray that had been given was done incorrectly; and the refusal or disregard for the need to perform a properly performed X-ray, on the site of the plaintiff's injury.

40. The City of Philadelphia is liable for this violation of plaintiff's right to receive proper and adequate medical care, based on the CFCF Warden's notice of plaintiff's injury and his inaction in taking corrective action, which was based on

35. Defendants, through their personnel named in the caption above, failed to provide plaintiff with adequate medical care for a serious injury.

36. Defendants' failure to either give plaintiff an X-ray, and/or perform it correctly, fell below the standard of medical care that medical professionals in Pennsylvania would require for the injury that plaintiff suffered, including based on his description of how and where his finger was injured, and also based on medical observation of the finger.

37. Plaintiff filed a grievance at CFCF, which went to its warden, who is the top and final policy maker at the prison for determining reasonable accommodations, under its reasonable accommodations program; the warden is also the final decision maker and policy maker regarding at CFCF determining whether a prisoner has successfully grieved a claim of denial of adequate medical treatment; The warden denied and then delayed plaintiff's participation in CFCF's reasonable accommodations program and he denied and delayed plaintiff's request for adequate medical treatment, resulting in pain and suffering by the plaintiff.

**COUNT ONE – VIOLATION OF SECTION 1983 FOR DELIBERATE INDIFFERENCE TO  
THE NEED FOR MEDICAL TREATMENT FOR A SERIOUS INJURY AS TO ALL  
DEFENDANTS**

his decision as the highest level personnel at CFCF and its policy maker; the Warden's decision was the policy of CFCF, as he was its policy maker for its medical services and deciding if any prisoner had adequately grieved a claim for denial of adequate medical treatment.

41. As a result of the defendant's collective actions, plaintiff has suffered pain and suffering from while he was incarcerated, and thereafter, up until the present, because the delay in obtaining proper medical treatment led to a continuation of his pain and suffering.

42. Defendants' actions were done either deliberately or with reckless disregard for plaintiff's civil rights.

WHEREFORE, plaintiff requests judgment in his favor against defendants, jointly and severally, and he requests the following relief:

- a. Compensatory damages;
- b. Punitive damages for the individual defendants only;
- c. Reasonable attorney's fees and costs;
- d. Any other relief the Court deems appropriate.

**COUNT TWO – VIOLATION OF THE ADA AND ADA AND SECTION 1983 AS TO DEFENDANTS THE CITY OF PHILADELPHIA AND CORIZONE HEALTH AND IT'S CURRENTLY UNKNOWN AND UNNAMED EMPLOYEES**



43. Plaintiff incorporates paragraphs 1-42 above as though fully set forth herein.

44. Plaintiff is/was disabled based on his diabetes, sleep apnea, and his obesity, which affects his major life activities including physical movement, and the ability to sleep without significant disturbance, and his ability to properly regulate blood sugar.

45. These conditions were known to defendant the City of Philadelphia, including by the Warden of CFCF, based on plaintiff's prison records, and based on plaintiff's grievance to the Warden, in which he requested a reasonable accommodation for his disabilities; despite his request, the Warden deliberately denied and/or purposely delayed providing the reasonable accommodation that plaintiff be assigned a lower level bed for an inordinate amount of time.

46. As a result in the intentional delay receiving a low level bunk bed, plaintiff experienced pain and suffering having to climb up and down from the upper level bed, including with a broken finger; he also suffered emotional distress from the fear of falling, including while climbing, and while sleeping based on his sleep apnea, which could cause him to unexpectedly fall while having an attack while sleeping.

50. Defendants Corizone health and its named defendant employees above employees who treated plaintiff for his broken finger, woefully failed to provide him a standard of medical care as required by that medical professionals in Pennsylvania; the defendants care fell outside of acceptable professional standards and resulted in harm to the plaintiff.

51. This deviation from acceptable professional standards includes but is not limited to: (1) failure to properly examine plaintiff; (2) failure to examine the cite of plaintiff's injury (3) failure to have an appropriate medical professional, including an expert examine and/or treat plaintiff; (3) failure to perform an appropriate X-ray, and/or failure to properly perform and X-ray; (4) failure to properly read an X-ray; (5) failure to have an appropriate medical professional read an X-ray; (6) failure to reexamine plaintiff after repeated complaints that his finger appeared broken and he was worsening, including failure to either do another X-ray, or perform an MRI; (7) failure to properly secure and/or cast the finger; (8) failure to provide proper medication pain management.

52. Plaintiff's pain and suffering was proximately caused by defendants' medical malpractice, which was done either intentionally or with reckless disregard for plaintiff's health

47. Although the Warden addressed reasonable accommodations which were addressed to him, upon reasonable information and belief, Corizone Health and its employees were responsible to field reasonable accommodations requests as well, which plaintiff had made to its and its currently unknown and unnamed employees on several occasions.

48. Defendants Corizone Health and its currently unknown and unnamed intentionally and/or recklessly refused to properly and timely address plaintiff's requests to them for reasonable accommodations, resulting in plaintiffs' physical and emotional pain and suffering described above.

WHEREFORE, plaintiff requests judgment in his favor against the defendants Jointly and severally, and he requests the following relief:

- a. Compensatory damages;
- b. Reasonable attorney's fees and costs;
- c. Any other relief the Court deems appropriate.

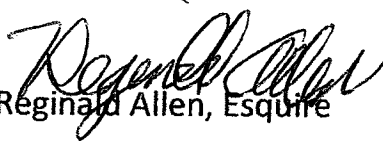
**COUNT THREE – SUPPLEMENTAL PENNSYLVANIA STATE LAW CLAIM FOR  
MEDICAL MALPRACTICE AS TO DEFENDANT CORIZONE AND ITS EMPLOYEE  
DEFENDANTS**

49. Plaintiff incorporates paragraphs 1-48 above as though fully set forth herein.

WHEREFORE, plaintiff requests judgment in his favor, jointly and severally and he requests the following relief:

- a. Compensatory damages
- b. Punitive damages.

Respectfully submitted,

  
Reginald Allen, Esquire