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Attorneys for Plaintiffs
ALICE BROCK
ROBERT MOST

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN MATEO**

ALICE BROCK and ROBERT MOST,
Plaintiffs,
vs.

STANFORD HEALTH CARE; STANFORD
UNIVERSITY HOSPITAL; STANFORD
HOSPITAL; STANFORD MEDICINE;
STANFORD NEUROSCIENCE HEALTH
CENTER; JAIMIE MACDONALD
HENDERSON, MD; VICTOR BAUTISTA, RT;
and DOES 1-50, inclusive,
Defendants.

Case No.: 26-CIV-05331

COMPLAINT FOR:

- 1. PROFESSIONAL NEGLIGENCE**
- 2. MEDICAL BATTERY**
- 3. LOSS OF CONSORTIUM**

JURY TRIAL DEMANDED

COMES NOW PLAINTIFFS, ALICE BROCK and ROBERT MOST, and each of them,
and complain of defendants, and each of them, and allege, on information and belief, as follows:

PARTIES

1. Plaintiff ALICE BROCK is an individual and adult person.
2. Plaintiff ROBERT MOST is an individual and adult person.
3. Plaintiffs ALICE BROCK and ROBERT MOST are, and at all times mentioned
herein were, lawfully married.

1 4. At all times complained of herein, Defendants STANFORD HEALTH CARE;
2 STANFORD UNIVERSITY HOSPITAL; STANFORD HOSPITAL; STANFORD MEDICINE;
3 and STANFORD NEUROSCIENCE HEALTH CENTER were entities organized and existing
4 under and by virtue of the laws of the State of California, and were at all times and places
5 complained of herein engaged in the ownership, operation, and maintenance of hospitals and
6 other medical facilities open to the general public and to paying patients in and about the County
7 of Santa Clara.

8 5. Defendant JAIMIE MACDONALD HENDERSON, MD is an individual.
9 PLAINTIFFS are informed and believe that at all times relevant to this Complaint, Dr.
10 Henderson was performing work for and on behalf of STANFORD HEALTH CARE;
11 STANFORD UNIVERSITY HOSPITAL; STANFORD HOSPITAL; STANFORD MEDICINE;
12 and/or STANFORD NEUROSCIENCE HEALTH CENTER. PLAINTIFFS are informed and
13 believe that Dr. Henderson resides in the County of Santa Clara.

14 6. Defendant VICTOR BAUTISTA is an individual. PLAINTIFFS are informed and
15 believe that at all times relevant to this Complaint, Mr. Bautista was performing work for and on
16 behalf of STANFORD HEALTH CARE; STANFORD UNIVERSITY HOSPITAL;
17 STANFORD HOSPITAL; STANFORD MEDICINE; and/or STANFORD NEUROSCIENCE
18 HEALTH CENTER.

19 7. PLAINTIFFS are unaware of the true names and capacities of the defendants sued
20 herein as DOES 1 – 50, inclusive, and therefore sues these defendants by such fictitious names
21 pursuant to Code of Civil Procedure Section 474. PLAINTIFFS will amend this Complaint to
22 allege their true names and capacities when ascertained. PLAINTIFFS are informed and believe
23 and thereupon allege that each fictitiously-named defendant is responsible in some manner for
24 the occurrences alleged herein, that the damages as alleged herein were directly and proximately
25 caused by each such fictitiously-named defendant, and that PLAINTIFFS are entitled to the
26 relief requested herein against each such fictitiously-named defendant.

27 8. Reference herein to “DEFENDANTS” without other limitation shall include all
28 specifically and fictitiously named defendants, including defendants who were the officers,

1 directors, and/or managing agents of other defendants. Whenever and wherever reference is
2 made in this Complaint to DEFENDANTS, such reference shall include each and every
3 specifically and fictitiously named defendant individually, jointly, and severally.

4 9. Upon information and belief, at all times herein mentioned, each of the
5 DEFENDANTS was the agent, employee, and/or partner of, and/or was working in concert with,
6 each of the remaining DEFENDANTS, and in doing the things herein alleged, each was acting
7 within the course and scope of such agency, employment, partnership, and/or concerted activity.

8 **JURISDICTION AND VENUE**

9 10. This Court is the proper Court because the alleged damages exceed the
10 jurisdictional minimum of this Court.

11 11. Venue is proper in this Court as at least one defendant now resides in its
12 jurisdictional area.

13 **FIRST CAUSE OF ACTION**

14 **[Professional Negligence]**

15 **[Against all DEFENDANTS]**

16 12. PLAINTIFFS hereby incorporate by reference each of the allegations in each of
17 the preceding paragraphs as though fully set forth herein.

18 13. In 2012, Plaintiff ALICE BROCK had an intrathecal baclofen pump placed into
19 her body by Dr. Edward Chang, M.D. The purpose of the pump was to deliver muscle relaxant
20 medication into her spinal canal and alleviate spasticity.

21 14. On July 14, 2025, Plaintiff ALICE BROCK presented to DEFENDANTS for the
22 purpose of undergoing a myelogram to evaluate the functioning of her baclofen pump.

23 15. A myelogram is a diagnostic imaging test in which a contrast dye is injected into
24 the intrathecal space and which allows health care providers to assess whether a baclofen pump
25 system is functioning properly.

26 16. Defendants JAIMIE MACDONALD HENDERSON, MD; VICTOR
27 BAUTISTA, RT, and DOES 1-10 chose to use Omnipaque 350 as the contrast dye to inject into
28 ALICE BROCK's intrathecal space.

1 17. At the time of the July 14, 2025 procedure, Omnipaque 350 was the subject of an
2 FDA-approved boxed warning — commonly called a black box warning — concerning risks
3 associated with intrathecal administration of Omnipaque injection 140 and 350 mg iodine/mL
4 (i.e. “Omnipaque 140” and “Omnipaque 350”). The FDA-approved labeling warned that
5 intrathecal administration of a wrong iodine concentration, even if inadvertent, may cause death,
6 seizures/convulsions, cerebral hemorrhage, coma, paralysis, arachnoiditis, acute renal failure,
7 cardiac arrest, rhabdomyolysis, hyperthermia, and brain edema. The FDA labeling also indicated
8 that Omnipaque 140 and Omnipaque 350 were contraindicated for intrathecal use.

9 18. Specific warnings concerning intrathecal administration of Omnipaque 350 are
10 included below:

**WARNING: RISKS ASSOCIATED WITH INTRATHECAL
ADMINISTRATION OF OMNIPACQUE INJECTION
140 and 350 mg IODINE/mL**

**Use only the iodine concentrations and presentations
recommended for intrathecal procedures. Intrathecal
administration of a wrong iodine concentration, even if
inadvertent, may cause death, convulsions, seizures, cerebral
hemorrhage, coma, paralysis, arachnoiditis, acute renal failure,
cardiac arrest, rhabdomyolysis, hyperthermia, and brain
edema. (2.2, 2.8, 5.1)**

**WARNINGS—General
SEVERE ADVERSE EVENTS - INADVERTENT INTRATHECAL
ADMINISTRATION**

Serious adverse reactions have been reported due to the inadvertent intrathecal administration of iodinated contrast media that are not indicated for intrathecal use. These serious adverse reactions include: death, convulsions, cerebral hemorrhage, coma, paralysis, arachnoiditis, acute renal failure, cardiac arrest, seizures, rhabdomyolysis, hyperthermia, and brain edema. Special attention must be given to ensure that OMNIPACQUE 350 is not administered intrathecally. (OMNIPACQUE 300 is approved for intrathecal administration).

1 19. Notwithstanding the black box warning concerning risks associated with
2 intrathecal administration of Omnipaque 350, as referenced above, and the fact that Omnipaque
3 350 is specifically contraindicated for intrathecal use, Defendants JAIMIE MACDONALD
4 HENDERSON, MD; VICTOR BAUTISTA, RT; and DOES 1-10 injected Omnipaque 350,
5 and/or otherwise caused Omnipaque 350 to be injected, into ALICE BROCK'S intrathecal
6 space.

7 20. Following administration of the Omnipaque 350, over the course of the next
8 several hours, ALICE BROCK experienced a decline in neurological functioning to the point
9 that she lost her ability to move her legs.

10 21. ALICE BROCK was never advised, prior to injection of Omnipaque 350, that she
11 was going to receive an injection of Omnipaque 350 and never provided informed consent to the
12 use of Omnipaque 350.

13 22. DEFENDANTS and each of them had a duty to use the level of skill, knowledge,
14 and care in the provision of health care related goods and services that other reasonably careful
15 health care providers would use in the same or similar circumstances. Further, said
16 DEFENDANTS had a duty to provide procedures, policies, facilities, supplies, and qualified
17 personnel reasonably necessary for the treatment of its patients, including ALICE BROCK.

18 23. DEFENDANTS, and each of them, breached their duty of care through their
19 various acts and omissions, including but not limited to choosing to inject Omnipaque 350 into
20 ALICE BROCK's intrathecal space; intentionally and willfully injecting Omnipaque 350 into
21 ALICE BROCK's intrathecal space; failing to obtain ALICE BROCK's informed consent to the
22 injection of Omnipaque 350; failing to possess and enforce reasonable policies and procedures
23 designed to ensure that patients are not injected with contrast dyes that are contraindicated and
24 which have the potential to seriously harm or kill them; and otherwise allowing for Omnipaque
25 350 to be injected into ALICE BROCK's intrathecal space without her informed consent.

26 24. As a direct and proximate result of the negligence of DEFENDANTS, Plaintiff
27 ALICE BROCK was caused to suffer injuries including but not limited to decreased sensation,
28 increased weakness, motor loss, impaired balanced, impaired mobility, increased spasticity, and

1 increased tone. She can no longer walk the way she could previously.

2 25. As a further direct and proximate result of the negligence of DEFENDANTS,
3 Plaintiff ALICE BROCK has been required to employ the services of physicians and other
4 professionals, in an attempt to remedy the damage and injury caused by said Defendants'
5 negligence. Plaintiff ALICE BROCK has been compelled to incur expenses for such treatment,
6 medicines, and other services. Plaintiff ALICE BROCK is informed and believes, and thereon
7 alleges, that further services of said nature will be required by her in the future in an amount to
8 be shown according to proof at trial.

9 26. As a further direct and proximate result of DEFENDANTS' negligence, Plaintiff
10 ALICE BROCK has sustained, and will continue to sustain, past and future physical and
11 emotional injuries and past and future economic and non-economic damages including but not
12 limited to: (i) past and future physical pain, suffering, emotional pain, distress, frustration,
13 annoyance, worry, and loss of enjoyment of life; and (ii) past and future medical expenses and
14 past and future loss of income.

15 **SECOND CAUSE OF ACTION**

16 **[Medical Battery]**

17 **[Against Defendants JAIMIE MACDONALD HENDERSON, MD; AND VICTOR**
18 **BAUTISTA, RT]**

19 27. PLAINTIFFS hereby incorporate by reference each of the allegations in each of
20 the preceding paragraphs as though fully set forth herein.

21 28. Defendants JAIMIE MACDONALD HENDERSON, MD and VICTOR
22 BAUTISTA, RT intentionally injected Omnipaque 350, and/or otherwise intentionally caused
23 Omnipaque 350 to be injected, into ALICE BROCK's intrathecal space without ALICE
24 BROCK's consent.

25 29. Following administration of the Omnipaque 350, over the course of the next
26 several hours, ALICE BROCK experienced a decline in neurological functioning to the point
27 that she lost her ability to move her legs.

28 30. As a direct and proximate result of Plaintiff ALICE BROCK being injected with

1 Omnipaque 350 without her consent, Plaintiff ALICE BROCK was caused to suffer injuries
2 including but not limited to decreased sensation, increased weakness, motor loss, impaired
3 balanced, impaired mobility, increased spasticity, and increased tone. She can no longer walk the
4 way she could previously.

5 31. As a further direct and proximate result of Plaintiff ALICE BROCK being
6 injected with Omnipaque 350 without her consent, Plaintiff ALICE BROCK has been required
7 to employ the services of physicians and other professionals, in an attempt to remedy the damage
8 and injury caused by said Defendants' conduct. Plaintiff ALICE BROCK has been compelled to
9 incur expenses for such treatment, medicines, and other services. Plaintiff ALICE BROCK is
10 informed and believes, and thereon alleges, that further services of said nature will be required
11 by her in the future in an amount to be shown according to proof at trial.

12 32. As a further direct and proximate result of Plaintiff ALICE BROCK being
13 injected with Omnipaque 350 without her consent, Plaintiff ALICE BROCK has sustained, and
14 will continue to sustain, past and future physical and emotional injuries and past and future
15 economic and non-economic damages including but not limited to: (i) past and future physical
16 pain, suffering, emotional pain, distress, frustration, annoyance, worry, and loss of enjoyment of
17 life; and (ii) past and future medical expenses and past and future loss of income.

18 **THIRD CAUSE OF ACTION**

19 **[Loss of Consortium]**

20 **[Against All DEFENDANTS]**

21 33. PLAINTIFFS hereby incorporate by reference each of the allegations in each of
22 the preceding paragraphs as though fully set forth herein.

23 34. At all relevant times Plaintiff ALICE BROCK and ROBERT MOST were
24 lawfully married.

25 35. As a result of the conduct complained of herein and the resultant harms sustained
26 by Plaintiff ALICE BROCK, her husband, ROBERT MOST, has sustained losses involving his
27 wife's companionship and services, including losses of love, companionship, comfort, care,
28 assistance, protection, affection, society, and moral support.

RELIEF

WHEREFORE, PLAINTIFFS pray for judgment against DEFENDANTS, and each of them, jointly and severally, as follows:

1. For past and future general damages according to proof;
2. For past and future special damages according to proof;
3. For prejudgment interest according to law;
4. For costs of suit; and
5. For such other and further relief as the Court deems just and proper.

Dated: July 6, 2026

ROUDA, FEDER, TIETJEN & McGUINN



By: _____

Loren Schwartz
Attorneys for Plaintiffs
ALICE BROCK
ROBERT MOST

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Dated: July 6, 2026

Loran Schmitt

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COMPLAINT