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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

JANE DOE #1)	Case No: 25STCV15910
JANE DOE #2)	
JANE DOE #3)	COMPLAINT FOR DAMAGES:
JANE DOE #4)	
JANE DOE #5)	1. VIOLATION OF UNRUH ACT
JANE DOE #6)	(Civil Code § 51)
JANE DOE #7)	2. VIOLATION OF BANE ACT
JANE DOE #8)	(Civil Code § 52.1)
JANE DOE #9)	3. GENDER VIOLENCE (Civil
JANE DOE #10)	Code § 52.4)
JANE DOE #12)	4. SEXUAL HARASSMENT (Civil
JANE DOE #13)	Code § 51.9)
JANE DOE #14)	5. SEXUAL ASSAULT
JANE DOE #15)	6. SEXUAL BATTERY (Civil Code
JANE DOE #16)	§ 1708.5)
JANE DOE #17)	7. INTENTIONAL INFLICTION
JANE DOE #18)	OF EMOTIONAL DISTRESS
JANE DOE #19)	8. NEGLIGENCE (Code of Civil
JANE DOE #20)	Procedure § 1714)
JANE DOE #21)	9. GROSS NEGLIGENCE and/or
JANE DOE #22)	WANTON and RECKLESS
JANE DOE #23)	CONDUCT
JANE DOE #24)	10. NEGLIGENT SUPERVISION
JANE DOE #25)	HIRING, TRAINING AND
JANE DOE #26)	RETENTION

JANE DOE #27
JANE DOE #28
JANE DOE #29
JANE DOE #30
JANE DOE #31
JANE DOE #33
JANE DOE #34
JANE DOE #36
JANE DOE #37
JANE DOE #38
JANE DOE #39
JANE DOE #40
JANE DOE #41
JANE DOE #42
JANE DOE #43
JANE DOE #44
JANE DOE #45
JANE DOE #46
JANE DOE #47

Plaintiffs,

v.

BARRY BROCK, M.D., an individual; CEDARS SINAI MEDICAL CENTER, a California Corporation; CEDARS-SINAI HEALTH SYSTEM, a California Corporation; CEDARS SINAI MEDICAL GROUP, an unknown business entity; CEDARS SINAI WOMEN'S MEDICAL GROUP, an unknown business entity; BEVERLY HILLS OBGYN, an unknown business entity; RODEO DRIVE WOMEN'S HEALTH CENTER, a California Corporation; BARRY J. BROCK, M.D., INC., a California Corporation; and Does 1 through 100,

Defendants.

) 11. NEGLIGENT FAILURE TO
) WARN
) 12. INVASION OF PRIVACY
) 13. NEGLIGENT INFLICTION OF
) EMOTIONAL DISTRESS
) 14. UNFAIR BUSINESS
) PRACTICES (Business &
) Professions Code § 17200)
) 15. CONSTRUCTIVE FRAUD

) REQUEST FOR JURY TRIAL

) Judge:

) Dept.:

COMPLAINT FOR DAMAGES

Based upon information and belief available to Plaintiffs at the time of the filing of this Complaint for Damages, Plaintiffs makes the following allegations:

COME NOW, PLAINTIFFS, who complain and allege as follows:

GENERAL ALLEGATIONS AS TO THE PARTIES

1. This action seeks to support the rights of countless female patients who were sexually abused, harassed, and molested by serial sexual predator, DEFENDANT DR. BARRY J. BROCK (“BROCK”) while they were patients at DEFENDANTS CEDARS-SINAI MEDICAL CENTER (“CEDARS-SINAI”), and other DEFENDANT medical facilities named herein and collectively referred to as CORPORATE DEFENDANTS. Each Plaintiff (collectively, “PLAINTIFFS” or “Plaintiffs”) were induced to seek medical treatment from BROCK because of his affiliation with one of the most renowned medical institutions in the world – CEDARS-SINAI and its affiliates. Many of the Plaintiffs sought BROCK’s care due to his specialization in high-risk pregnancies, including but not limited to, women who were cancer survivors, women with various auto-immune disorders, and/or women presenting with fragile medical history rendering their pregnancies and gynecological care highly specialized.

2. BROCK used this position of trust and authority to repeatedly sexually abuse his patients by engaging in acts that include, but are not limited to: forcing his patients to undress completely in front of him while he watched; administering prolonged and medically unnecessary pelvic exams to his patients; groping his patients’ breasts; digitally penetrating his patients’ vaginas and anuses, often without wearing gloves and with unwashed hands; and making misogynistic, sexually-harassing comments to his patients. None of the foregoing acts served a legitimate medical purpose and all the described conduct was an outgrowth of his workplace responsibilities, conditions or events, and were committed to satisfy BROCK’s own prurient sexual interests.

3. CEDARS-SINAI, and DEFENDANTS named herein, have publicly attempted to scrub BROCK’S identity from their websites and materials without explanation despite *43 years* of continuously employing BROCK, holding BROCK out as a premiere physician in the field, and providing him unrestricted hospital privileges. Despite their recent efforts to conceal their affiliation with BROCK, CEDARS-SINAI cannot hide his history of sexual deviance and misconduct. CEDARS-

1 SINAI actively and deliberately concealed BROCK's sexual abuse of female patients for years,
2 continuing to grant BROCK unfettered sexual access to the women – including minors – in his and
3 CEDARS-SINAI's care, all to protect DEFENDANT CEDARS-SINAI's reputation and financial gain.

4 4. CCP § 340.16 provides recourse for sexual assault victims and survivors who have suffered
5 physical, psychological, or other injuries, as a result of a DEFENDANT'S misconduct which constitutes
6 a sexual offense under Sections 243.4, 261, 254.1, 286, 287, or 289, or former Sections 262 and 288a of
7 the Penal Code. Under Sections 243.4, 261, 254.1, 286, 287, or 289, or former Sections 262 and 288a of
8 the Penal Code, the relevant offenses herein include, but are not limited to, sexual misconduct, rape,
9 criminal sexual acts, sexual penetration, forcible touching, and predatory sexual assault. *See*, Penal Code
10 §§ 243.4, 261, 254.1, 286, 287, and 289. The Sexual Abuse and Cover-Up Accountability Act does not
11 create a new cause of action; rather it revives claims that can be asserted under existing law, such as tort
12 claims for battery or assault. The Sexual Abuse and Cover-Up Accountability Act amends California's
13 Civil Practice Law and Rules to revive temporarily any and all expired claims related to certain sexual
14 offenses committed against individuals 18 years of age, or older, that took place on or after January 1,
15 2009, with the exception of claims that were litigated to finality in court, or compromised by a settlement
16 agreement, before January 1, 2023. *See*, CCP § 340.16(b)(3). The law allows survivors of sexual assault,
17 whose claims were previously time-barred, to file a lawsuit against their abusers during a three-year
18 "look-back period" beginning on January 1, 2023, and ending on December 31, 2026. During the look-
19 back window, victims and survivors of sexual assault, can recover damages from their abusers and their
20 abusers' enablers. Therefore, Plaintiffs' claims are timely under CCP §§ 340.16(a) and 340.16(b)(3) and
21 other California State laws.

22 Plaintiffs' actions are also timely because the sexual exploitation and abuse that was committed
23 by DEFENDANT BARRY BROCK was performed under the guise of medical care and treatment, was
24 fraudulent, and was ratified, enabled, known, covered up, and actively concealed, by the CORPORATE
25 DEFENDANTS.

26 Plaintiffs JANE DOE # 1 through 10; JANE DOE # 12 through 31; JANE DOE # 33 through
27 34 and JANE DOE # 36 through 47, through their counsel herein, state as follows against
28 DEFENDANT BARRY J. BROCK, as well as DEFENDANTS CEDARS-SINAI MEDICAL

1 CENTER, CEDARS-SINAI HEALTH SYSTEMS, CEDARS-SINAI MEDICAL GROUP,
2 CEDARS-SINAI WOMEN'S MEDICAL GROUP, BEVERLY HILLS OBGYN, RODEO DRIVE
3 WOMEN'S HEALTH CENTER, and BARRY J. BROCK, MD, INC., (collectively
4 "DEFENDANTS" or "Defendants"), based upon their personal knowledge and, as to all other matters,
5 upon information and belief, including their counsel's investigation. Plaintiffs believe additional
6 evidentiary support exists for their claims, which will be revealed when given the opportunity to
7 conduct discovery.

8 **THE PARTIES**

9 ***PLAINTIFFS:***

10 1. Given the sensitive nature of their claims, Plaintiffs are using pseudonyms in this
11 litigation to protect their privacy. If required by the Court, Plaintiffs will seek permission to proceed
12 under these pseudonyms.

13 2. Plaintiff, JANE DOE 1, is an adult female and at all times relevant hereto, was a
14 resident of the State of California and a citizen of the United States.

15 3. Plaintiff, JANE DOE 2, is an adult female and at all times relevant hereto, was a resident
16 of the State of California and a citizen of the United States.

17 4. Plaintiff, JANE DOE 3, is an adult female and at all times relevant hereto, was a resident
18 of the State of California and a citizen of the United States.

19 5. Plaintiff, JANE DOE 4, is an adult female and at all times relevant hereto, was a resident
20 of the State of California and a citizen of the United States.

21 6. Plaintiff, JANE DOE 5, is an adult female and at all times relevant hereto, was a resident
22 of the State of California and a citizen of the United States.

23 7. Plaintiff, JANE DOE 6, is an adult female and at all times relevant hereto, was a resident
24 of the State of California and a citizen of the United States.

25 8. Plaintiff, JANE DOE 7, is an adult female and at all times relevant hereto, was a resident
26 of the State of California and a citizen of the United States.

1 9. Plaintiff, JANE DOE 8, is an adult female and at all times relevant hereto, was a resident
2 of the State of California and a citizen of the United States.

3 10. Plaintiff, JANE DOE 9, is an adult female and at all times relevant hereto, was a resident
4 of the State of California and a citizen of the United States.

5 11. Plaintiff, JANE DOE 10, is an adult female and at all times relevant hereto, was a
6 resident of the State of California and a citizen of the United States.

7 12. Plaintiff, JANE DOE 12, is an adult female and at all times relevant hereto, was a
8 resident of the State of California and a citizen of the United States.

9 13. Plaintiff, JANE DOE 13, is an adult female and at all times relevant hereto, was a
10 resident of the State of California and a citizen of the United States.

11 14. Plaintiff, JANE DOE 14, is an adult female and at all times relevant hereto, was a
12 resident of the State of California and a citizen of the United States.

13 15. Plaintiff, JANE DOE 15, is an adult female and at all times relevant hereto, was a
14 resident of the State of California and a citizen of the United States.

15 16. Plaintiff, JANE DOE 16, is an adult female and at all times relevant hereto, was a
16 resident of the State of California and a citizen of the United States.

17 17. Plaintiff, JANE DOE 17, is an adult female and at all times relevant hereto, was a
18 resident of the State of California and a citizen of the United States.

19 18. Plaintiff, JANE DOE 18, is an adult female and at all times relevant hereto, was a
20 resident of the State of California and a citizen of the United States.

21 19. Plaintiff, JANE DOE 19, is an adult female and at all times relevant hereto, was a
22 resident of the State of California and a citizen of the United States.

23 20. Plaintiff, JANE DOE 20, is an adult female and at all times relevant hereto, was a
24 resident of the State of California and a citizen of the United States.

25 21. Plaintiff, JANE DOE 21, is an adult female and at all times relevant hereto, was a
26 resident of the State of California and a citizen of the United States.

27 22. Plaintiff, JANE DOE 22, is an adult female and at all times relevant hereto, was a
28 resident of the State of California and a citizen of the United States.

1 23. Plaintiff, JANE DOE 23, is an adult female and at all times relevant hereto, was a
2 resident of the State of California and a citizen of the United States.

3 24. Plaintiff, JANE DOE 24, is an adult female and at all times relevant hereto, was a
4 resident of the State of California and a citizen of the United States.

5 25. Plaintiff, JANE DOE 25, is an adult female and at all times relevant hereto, was a
6 resident of the State of California and a citizen of the United States.

7 26. Plaintiff, JANE DOE 26, is an adult female and at all times relevant hereto, was a
8 resident of the State of California and a citizen of the United States.

9 27. Plaintiff, JANE DOE 27, is an adult female and at all times relevant hereto, was a
10 resident of the State of California and a citizen of the United States.

11 28. Plaintiff, JANE DOE 28, is an adult female and at all times relevant hereto, was a
12 resident of the State of California and a citizen of the United States.

13 29. Plaintiff, JANE DOE 29, is an adult female and at all times relevant hereto, was a
14 resident of the State of California and a citizen of the United States.

15 30. Plaintiff, JANE DOE 30, is an adult female and at all times relevant hereto, was a
16 resident of the State of California and a citizen of the United States.

17 31. Plaintiff, JANE DOE 31, is an adult female and at all times relevant hereto, was a
18 resident of the State of California and a citizen of the United States.

19 32. Plaintiff, JANE DOE 33, is an adult female and at all times relevant hereto, was a
20 resident of the State of California and a citizen of the United States.

21 33. Plaintiff, JANE DOE 34, is an adult female and at all times relevant hereto, was a
22 resident of the State of California and a citizen of the United States.

23 34. Plaintiff, JANE DOE 36, is an adult female and at all times relevant hereto, was a
24 resident of the State of California and a citizen of the United States.

25 35. Plaintiff, JANE DOE 37, is an adult female and at all times relevant hereto, was a
26 resident of the State of California and a citizen of the United States.

27 36. Plaintiff, JANE DOE 38, is an adult female and at all times relevant hereto, was a
28 resident of the State of California and a citizen of the United States.

1 37. Plaintiff, JANE DOE 39, is an adult female and at all times relevant hereto, was a
2 resident of the State of California and a citizen of the United States.

3 38. Plaintiff, JANE DOE 40, is an adult female and at all times relevant hereto, was a
4 resident of the State of California and a citizen of the United States.

5 39. Plaintiff, JANE DOE 41, is an adult female and at all times relevant hereto, was a
6 resident of the State of California and a citizen of the United States.

7 40. Plaintiff, JANE DOE 42, is an adult female and at all times relevant hereto, was a
8 resident of the State of California and a citizen of the United States.

9 41. Plaintiff, JANE DOE 43, is an adult female and at all times relevant hereto, was a
10 resident of the State of California and a citizen of the United States.

11 42. Plaintiff, JANE DOE 44, is an adult female and at all times relevant hereto, was a
12 resident of the State of California and a citizen of the United States.

13 43. Plaintiff, JANE DOE 45, is an adult female and at all times relevant hereto, was a
14 resident of the State of California and a citizen of the United States.

15 44. Plaintiff, JANE DOE 46, is an adult female and at all times relevant hereto, was a
16 resident of the State of California and a citizen of the United States.

17 45. Plaintiff, JANE DOE 47, is an adult female and at all times relevant hereto, was a
18 resident of the State of California and a citizen of the United States.

19
20 ***DEFENDANT, Barry J. BROCK, M.D.:***

21 46. DEFENDANT BROCK at all times mentioned herein, was and is an adult male, who the
22 Plaintiffs are informed and believe, and on that basis allege, lived in the State of California during the
23 period of time in which the sexual exploitation, abuse, harassment, and molestations set forth herein took
24 place, and is currently a resident of the State of California.

25 47. Plaintiffs are informed and believe, and on that basis allege, that BROCK received his
26 medical degree from McGill University in 1976 and completed his medical residency in Obstetrics and
27 Gynecology at DEFENDANT CEDARS-SINAI and/or CEDARS-SINAI HEALTH, in 1981.
28

1 48. After completing his residency, BROCK immediately began his OB/GYN practice at
2 CEDARS-SINAI and CEDARS-SINAI HEALTH. At all relevant times between 1981 and 2024,
3 BROCK remained an employee-agent of CEDARS-SINAI.

4 49. At all relevant times between 2017 and 2024, BROCK remained an employee-agent of
5 CEDARS-HEALTH, CEDARS-SINAI MEDICAL, CEDARS-SINAI WOMEN'S, and BEVERLY
6 HILLS continuously without interruption in the field of obstetrics and gynecology that over time,
7 became known as an elite specialist for high-risk patients.

8 50. DEFENDANT BROCK also maintained private practices at two clinics: RODEO
9 DRIVE between 2004 and 2024; and BROCK, INC. between 1986 and 1998 and again (after a 10-year
10 corporate lapse) between 2018 and 2024.

11 51. DEFENDANT BROCK, at all times relevant, was an agent, servant, and/or employee
12 of the CORPORATE DEFENDANTS, and its medical clinics facilities, and locations and/or was under
13 their complete control and/or direct supervision when he carried out his tortious conduct against
14 Plaintiffs. It was through these positions of access, trust, and authority that BROCK sexually exploited
15 and abused Plaintiffs.

16 52. The CORPORATE DEFENDANTS not only ratified, approved, and helped cover up
17 DEFENDANT BROCK'S misconduct, but also financially profited from BROCK'S inappropriate and
18 illegal behaviors as BROCK'S misconduct resulted in an estimated tens of millions of dollars in
19 increased medical costs to patients due to BROCK'S sexual exploitation of those patients under the
20 guise of medical care.

21 53. Plaintiffs are informed and believe, and on that basis assert, that BROCK is under criminal
22 investigation by the Los Angeles Police Department, based upon the sexually exploitative and abusive
23 conduct stated herein.

24 54. In the event that DEFENDANT BROCK is prosecuted and convicted of a felony for
25 the conduct herein, Plaintiffs request leave to amend the instant Complaint, such that a request for
26 attorneys fees can be made against BROCK pursuant to CCP § 1021.4.

1 ***CORPORATE DEFENDANTS:***

2 55. At all relevant times herein, the CORPORATE DEFENDANTS actively, regularly, and
3 fraudulently represented themselves to be a safe, secure environment where the general public, and the
4 Plaintiffs herein, could expect to receive first-rate medical care and treatment, without fear of being
5 subjected to sexual exploitation, abuse, assault or harassment by its own medical staff.

6 56. At all times during BROCK’S professional and personal relationship with the
7 CORPORATE DEFENDANTS, they held BROCK out to be a trustworthy, experienced, and legitimate
8 OB/GYN, as well as an agent, actual, apparent and/or ostensible agent, servant, representative and/or
9 employee of CORPORATE DEFENDANTS. By offering and renewing medical privileges to BROCK,
10 holding DEFENDANT BROCK out as an agent, actual, apparent and/or ostensible agent, servant,
11 representative and/or employee of CORPORATE DEFENDANTS, designating BROCK as a full time
12 OB/GYN at CORPORATE DEFENDANTS, scheduling patient appointments with BROCK, referring
13 OB/GYN patients to BROCK, the CORPORATE DEFENDANTS caused female patients to place their
14 trust and confidence in BROCK as a qualified, competent, and safe doctor.

15 57. While falsely representing to Plaintiffs, and the public, that BROCK was a trustworthy,
16 safe, and highly competent physician, the CORPORATE DEFENDANTS were concealing multiple
17 reports lodged by female patients, as well as reports from fellow medical personnel at CORPORATE
18 DEFENDANTS, about BROCK’s sexual exploitation and abuse of female patients.

19 58. Plaintiffs are informed and believe, and on this basis state, that the CORPORATE
20 DEFENDANTS received a myriad of complaints regarding BROCK’S sexually abusive behavior and,
21 therefore, knew of BROCK’S dangerous propensities to sexually exploit and abuse female patients.

22 59. Despite the CORPORATE DEFENDANTS’ knowledge about BROCK’S misconduct,
23 Plaintiffs are informed and believe, and on this basis state, that CORPORATE DEFENDANTS never
24 once reported BROCK to law enforcement, or to the Medical Board of California, despite the fact that
25 CORPORATE DEFENDANTS are mandated reporters that have a legal, moral, and ethical duty to
26 make such reports.
27
28

1 60. Plaintiffs are informed and believe, and on that basis state, that CORPORATE
2 DEFENDANTS benefitted financially from retaining BROCK as an OB/GYN by offering his services
3 to CORPORATE DEFENDANTS' female patients, at those patients' detriment and expense.

4 61. Plaintiffs further are informed and believe, and on this basis state, that CORPORATE
5 DEFENDANTS benefitted financially from actively concealing complaints of sexual abuse and other
6 inappropriate conduct made by their female patients against BROCK by, among other things,
7 protecting their own reputations and financial coffers. The CORPORATE DEFENDANTS deliberate
8 and fraudulent concealment, included, but is not limited to BROCK'S recent, and quiet suspension and
9 removal from the CEDARS-SINAI'S Physician Profile website, and BROCK'S ultimate "retirement"
10 from obstetrics and gynecology.

11 62. Upon information and belief, the CORPORATE DEFENDANTS hid negative reports
12 about BROCK, despite the fact that many of the reports came directly from the CORPORATE
13 DEFENDANTS own employees and staff, including nurses and medical assistants who were physically
14 present during the examinations as "chaperones", and witnessed BROCK'S sexual misconduct
15 firsthand. DEFENDANT BROCK has only recently "retired" so that the CORPORATE
16 DEFENDANTS can continue trying to conceal from Plaintiffs, and the public at large, that BROCK is
17 a known serial predator, who has sexually exploited and abused hundreds of unsuspecting female
18 patients.

19 ***A. DEFENDANT Cedars-Sinai Medical Center:***

20 63. DEFENDANT CEDARS-SINAI, at all times mentioned herein was and is a California
21 Corporation, having its principal place of business in the State of California, County of Los Angeles.
22 DEFENDANT CEDARS-SINAI is located at 8700 Beverly Blvd., Los Angeles, California.

23 64. DEFENDANT CEDARS-SINAI is a non-profit, tertiary, teaching hospital established
24 in 1902.

25 65. CEDARS-SINAI'S Code of Ethics states: "Cedars-Sinai expects all individuals who
26 provide services at Cedars-Sinai facilities to adhere to the guiding principles and standards reflected in
27 these Standards of Conduct."
28

1 66. DEFENDANT CEDARS-SINAI markets and promotes itself as being a safe,
2 affordable, and convenient healthcare provider where the general public, including the Plaintiffs herein,
3 can expect to receive the highest quality medical care and treatment, from highly-qualified CEDARS-
4 SINAI and/or CEDARS-SINAI HEALTH medical personnel—including DEFENDANT BROCK.

5 67. At all relevant times herein, CEDARS-SINAI knew, or should have known, that female
6 patients, in particular, require safe, direct, and private access to gynecological and reproductive
7 healthcare treatment. In fact, CEDARS-SINAI’s own website states that it offers each patient - “The
8 Care You Need from Doctors You Trust”.

9 68. CEDARS-SINAI also represents to its patients, and the public at large, that it provides
10 “...caring, comprehensive, OBGYN care delivered by a team of specialists [and] routine gynecological
11 examinations, including pap smears, pelvic examinations and breast examinations, are conducted by
12 caring professionals experienced in women’s health.”

13 69. CEDARS-SINAI’S Mission Statement proclaims: “As a leading academic healthcare
14 organization, our mission is to elevate the health status of the community we serve.”

15 70. DEFENDANTS CEDARS-SINAI and CEDARS-SINAI HEALTH, independently held
16 out DEFENDANT BROCK as an agent, actual, apparent and/or ostensible agent, servant,
17 representative and/or employee of DEFENDANT CEDARS-SINAI and/or CEDARS-SINAI
18 HEALTH by, among other things, publicly publishing information about their physician on the website
19 in a manner that would lead any reasonable person to conclude that BROCK was, in fact, an agent,
20 actual, apparent and/or ostensible agent, servant, representative and/or employee of DEFENDANTS
21 CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

22 ***B. DEFENDANT Cedars-Sinai Health Systems:***

23 71. Plaintiffs are informed and believe, and on this basis assert, that CEDARS-SINAI
24 HEALTH, at all times mentioned herein, was and is a California Corporation, having its principal place
25 of business in the State of California, County of Los Angeles. CEDARS-SINAI HEALTH operates as
26 an integrated health system with its principal place of business located at 8700 Beverly Blvd, in Los
27 Angeles.
28

1 72. CEDARS-SINAI HEALTH includes CEDARS-SINAI, a nationally recognized
2 academic medical center, along with a network of primary and specialty care providers, research
3 institutions, and affiliated hospitals.

4 73. At all relevant times, BROCK was employed by, or was an agent of CEDARS-SINAI
5 HEALTH, who held BROCK out to be a trustworthy, experienced, and legitimate OB/GYN, as well
6 as an agent, actual, apparent and/or ostensible agent, servant, representative and/or employee.

7 74. DEFENDANTS CEDARS-SINAI and CEDARS-SINAI HEALTH, independently held
8 out DEFENDANT BROCK as an agent, actual, apparent and/or ostensible agent, servant,
9 representative and/or employee of DEFENDANT CEDARS-SINAI and/or CEDARS-SINAI
10 HEALTH by, among other things, publicly publishing information about their physician on the website
11 in a manner that would lead any reasonable person to conclude that BROCK was, in fact, an agent,
12 actual, apparent and/or ostensible agent, servant, representative and/or employee of DEFENDANTS
13 CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

14 ***C. DEFENDANT Cedars-Sinai Medical Group:***

15 75. Plaintiffs are informed and believe, and on this basis assert, that CEDARS-SINAI
16 MEDICAL, at all times mentioned herein, was and is a California Corporation, having its principal
17 place of business in the State of California, County of Los Angeles.

18 76. CEDARS-SINAI MEDICAL is a non-profit obstetrics and gynecologic clinic, directly
19 affiliated with CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

20 77. At all relevant times, BROCK was employed by, or was an agent of CEDARS-SINAI
21 MEDICAL, who held BROCK out to be a trustworthy, experienced, and legitimate OB/GYN, as well
22 as an agent, actual, apparent and/or ostensible agent, servant, representative and/or employee.

23 78. CEDARS SINAI MEDICAL markets and promotes itself as being a safe, affordable
24 and convenient healthcare provider where the general public, including the Plaintiffs herein, can expect
25 to receive the highest quality medical care and treatment from highly qualified CEDARS-SINAI and/or
26 CEDARS-SINAI HEALTH medical personnel.
27
28

1 79. At all times relevant herein, CEDARS-SINAI MEDICAL knew, or should have known,
2 that female patients in particular require safe, direct and private access to gynecological and
3 reproductive healthcare treatment.

4 ***D. DEFENDANT Cedars-Sinai Women's Medical Group:***

5 80. Plaintiffs are informed and believe, and on this basis assert, that CEDARS-SINAI
6 WOMEN'S, at all times mentioned herein was and is a California Corporation, having its principal
7 place of business in the State of California, County of Los Angeles.

8 81. CEDARS-SINAI WOMEN'S, is a non-profit obstetrics and gynecologic clinic, directly
9 affiliated with CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

10 82. At all relevant times, BROCK was employed by, or was an agent of CEDARS-SINAI
11 WOMEN'S, who held BROCK out to be a trustworthy, experienced, and legitimate OB/GYN, as well
12 as an agent, actual, apparent and/or ostensible agent, servant, representative and/or employee.

13 83. CEDARS-SINAI WOMEN'S, markets and promotes itself as being a safe, affordable
14 and convenient healthcare provider where the general public, including the Plaintiffs herein can expect
15 to receive the highest quality medical care and treatment from highly qualified CEDARS SINAI
16 WOMEN'S medical personnel.

17 84. At all times relevant herein, CEDARS-SINAI WOMEN'S knows or should have known
18 that female patients in particular require safe, direct and private access to gynecological and reproductive
19 healthcare treatment.

20 ***E. DEFENDANT Beverly Hills OBGYN:***

21 85. Plaintiffs are informed and believe, and on this basis assert that BEVERLY HILLS
22 OBGYN at all times mentioned herein was and is a California Corporation, having its principal place
23 of business in the State of California, County of Los Angeles.

24 86. DEFENDANT BEVERLY HILLS is a for-profit healthcare center located in Beverly
25 Hills, California and directly affiliated with CEDARS-SINAI and/or CEDARS-SINAI HEALTH.
26
27
28

1 87. At all relevant times, BROCK was employed by, or was an agent of BEVERLY HILLS,
2 who held BROCK out to be a trustworthy, experienced, and legitimate OB/GYN, as well as an agent,
3 actual, apparent and/or ostensible agent, servant, representative and/or employee.

4 88. BEVERLY HILLS markets and promotes itself as being a safe, affordable and
5 convenient healthcare provider where the general public, including the Plaintiffs herein, can expect to
6 receive the highest quality medical care and treatment from highly qualified BEVERLY HILLS
7 medical personnel.

8 89. At all times relevant herein, BEVERLY HILLS knew, or should have known, that
9 female patients, in particular, require safe, direct, and private access to gynecological and reproductive
10 healthcare treatment.

11 ***F. DEFENDANT Rodeo Drive Women's Health Center:***

12 90. Plaintiffs are informed and believe, and on this basis assert, that DEFENDANT RODEO
13 DRIVE, at all times mentioned herein was and is a California Corporation, having its principal place
14 of business in the State of California, County of Los Angeles.

15 91. DEFENDANT RODEO DRIVE is a for-profit medical facility located in Los Angeles,
16 California and directly affiliated with CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

17 92. At all relevant times, BROCK was employed by, or was an agent of RODEO DRIVE,
18 who held BROCK out to be a trustworthy, experienced, and legitimate OB/GYN, as well as an agent,
19 actual, apparent and/or ostensible agent, servant, representative and/or employee.

20 93. RODEO DRIVE proclaimed itself to be "A full-service OBGYN practice dedicated to
21 providing women in the Beverly Hills area with the high level of care that they deserve in the fields of
22 pregnancy, high-risk obstetrics and gynecology".

23 94. Furthermore, RODEO DRIVE markets and promotes itself as being a safe, affordable,
24 and convenient healthcare provider where the general public, including the Plaintiffs herein, can expect
25 to receive the highest quality medical care and treatment from highly qualified RODEO DRIVE
26 medical personnel.

1 95. DEFENDANT RODEO DRIVE also represents to its patients, and the public at large,
2 that “Each member of their team of highly experienced team of physicians is an attending physician at
3 one of the most revered medical institutions in the world, Cedars-Sinai Medical Center in Los Angeles,
4 California.”

5 96. At all times relevant herein, RODEO DRIVE knew, or should have known, that female
6 patients, in particular, require safe, direct, and private access to gynecological and reproductive
7 healthcare treatment.

8 ***G. DEFENDANT Barry J. BROCK, M.D., Inc.:***

9 97. Plaintiffs are informed and believe, and on that basis assert, that DEFENDANT
10 BROCK, INC., at all times mentioned herein was and is a California Corporation, having its principal
11 place of business in the State of California, County of Los Angeles.

12 98. BROCK, INC. is a for-profit medical facility located in Los Angeles, California and
13 directly affiliated with CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

14 99. BROCK, INC., represents to its patients, and the public at large, that BROCK and
15 BROCK, INC., “Takes pride in giving quality care to all his patients”.

16 100. At all relevant times, BROCK was employed by, or was an agent of BROCK, INC.,
17 who held BROCK out to be a trustworthy, experienced, and legitimate OB/GYN, as well as an agent,
18 actual, apparent and/or ostensible agent, servant, representative and/or employee.

19 101. BROCK, INC., markets and promotes itself as being a safe, affordable, and convenient
20 healthcare provider where the general public, including the Plaintiffs herein, can expect to receive the
21 highest quality medical care and treatment from highly qualified BROCK, INC., medical personnel.

22 102. At all relevant times herein, BROCK, INC., knew, or should have known, that female
23 patients, in particular, require safe, direct, and private access to gynecological and reproductive
24 healthcare treatment.

25 103. DEFENDANTS DOES 1 through 100, inclusive, and each of them, are sued herein
26 under said fictitious names. Plaintiffs are ignorant as to the true names and capacities of DOES 1
27 through 100, whether individual, corporate, associate, or otherwise, and therefore sue said
28 DEFENDANTS by such fictitious names. When their true names and capacities are ascertained,

1 Plaintiffs will request leave of Court to amend this Complaint to state their true names and capacities
2 herein.

3
4 **STATEMENT OF JURISDICTION AND VENUE**

5 **(For Adult Victims of Sexual Abuse)**

6 104. This action is brought, *inter alia*, pursuant to California Civil Procedure (CCP) § 340.16
7 and the Sexual Abuse and Cover-Up Accountability Act. Plaintiffs include female patients who were
8 sexually assaulted, sexually exploited, and sexually abused by BROCK who was employed, supervised,
9 contracted, hired, managed, controlled, directed, protected, and enabled, by DEFENDANTS to render
10 medical care and treatment to female patients.

11 105. California Civil Procedure (CCP) § 340.16 provides recourse for adult sexual assault
12 victims and survivors who have suffered physical, psychological, or other injuries, as a result of a
13 DEFENDANTS' misconduct which constitutes a sexual offense. The relevant offenses herein include,
14 but are not limited to, sexual misconduct, rape, criminal sexual acts, sexual penetration, forcible
15 touching, and predatory sexual assault. *See*, Penal Code § 243.4, 261, 254.1, 286, 287, and 289.

16 106. The Sexual Abuse and Cover-Up Accountability Act revives claims that can be asserted
17 under existing law, such as tort claims for battery or assault. The Sexual Abuse and Cover-Up
18 Accountability Act amended California's Civil Practice Law and Rules to revive temporarily any and
19 all expired claims related to certain sexual offenses committed against individuals 18 years of age, or
20 older, that took place on or after January 1, 2009, with the exception of claims that were litigated to
21 finality in court, or compromised by a settlement agreement, before January 1, 2023. *See*, CCP §
22 340.16(b)(3). The law allows survivors of sexual assault, whose claims were previously time-barred,
23 to file a lawsuit against their abusers during a three-year "look-back period" beginning on January 1,
24 2023, and ending on December 31, 2026. During the look-back window, victims and survivors of
25 sexual assault, can recover damages from their abusers and their abusers' enablers. Therefore, plaintiffs
26 'claims are timely under CCP §§ 340.16(a) and 340.16(b)(3) and other California State laws.
27
28

**The Statute of Limitations is Likewise Tolloed Based on the Continuing
Violations Doctrine, Fraud, Fraudulent Concealment, Aiding & Abetting,
And Criminal Cover-Up**

107. DEFENDANTS intentionally concealed material facts regarding DEFENDANT BROCK's conduct, including that Plaintiffs had valid causes of action against the CORPORATE DEFENDANTS at the time the conduct occurred. DEFENDANTS misrepresented and omitted facts by portraying BROCK's actions as legitimate medical care. In truth, BROCK's conduct was not consistent with any recognized medical standard, including obstetrics and gynecology, but was instead criminal and exploitative in nature. CORPORATE DEFENDANTS participated in a cover-up of this conduct, enabling BROCK's continued abuse of female patients under the guise of medical treatment.

108. At the time these misrepresentations and omissions were made, DEFENDANTS knew they were false. They were aware that BROCK's examinations and conduct were inappropriate, illegitimate, and not within any standard of care for any medical specialty. The acts were performed for BROCK's personal sexual gratification, not for medical purposes.

109. DEFENDANTS made these misrepresentations and omissions with the intent that Plaintiffs and other female patients rely upon them. Plaintiffs were misled into believing that BROCK's misconduct constituted appropriate medical care. DEFENDANTS' deception prevented Plaintiffs from recognizing the abuse, dissuaded them from reporting it, and delayed the discovery of valid legal claims. This concealment allowed BROCK to continue his exploitation, further harming patients and obstructing law enforcement investigation.

110. Plaintiffs reasonably relied on DEFENDANTS' misrepresentations and omissions in the following ways:

- a. They believed BROCK's examinations were medically appropriate and legitimate;
- b. They were unaware of the inappropriateness of BROCK's conduct; and
- c. They did not realize they had potential legal claims against BROCK and the CORPORATE DEFENDANTS for his misconduct and the subsequent cover-up.

111. Directors, managers, supervisors, physicians, nurses, and other staff at CEDARS-SINAI, CEDARS-SINAI HEALTH, CEDARS SINAI MEDICAL, CEDARS SINAI WOMEN'S, BEVERLY HILLS, RODEO DRIVE, and/or BROCK, INC., took deliberate actions to conceal BROCK's misconduct. These actions included suppressing complaints, failing to act on reports, and continuing to expose female patients to BROCK despite knowledge of his prior misconduct.

112. The conduct described above constitutes fraud, fraudulent concealment, conspiracy, aiding and abetting, and a coordinated effort to obstruct justice.

113. As a result of DEFENDANTS' wrongful conduct, the statute of limitations on Plaintiffs' claims was equitably tolled, and DEFENDANTS are equitably estopped from asserting it as a defense.

114. CORPORATE DEFENDANTS undertook numerous actions to conceal BROCK's pattern of abuse and to hinder detection of his misconduct, including:

- a. Allowing BROCK to remain in a position of trust despite knowledge of his behavior;
- b. Scheduling patients with BROCK without a chaperone;
- c. Providing BROCK unfettered access to female patients under the guise of legitimate obstetrics and gynecological care;
- d. Misrepresenting BROCK as competent and as a physician who adheres to appropriate medical practices and conduct;
- e. Failing to disclose BROCK's prior misconduct to patients, the public, or authorities;
- f. Neglecting to investigate prior complaints or reports;
- g. Failing to implement safeguards to prevent BROCK's misconduct; and
- h. Neglecting to establish systems for proper supervision and mandatory reporting under California Penal Code § 11160.

115. At all relevant times, BROCK acted as an actual, apparent, or ostensible agent, servant, representative, and/or employee of CORPORATE DEFENDANTS. His actions were within the scope of this relationship, making the CORPORATE DEFENDANTS vicariously liable.

116. CORPORATE DEFENDANTS participated in, conspired with, and aided each other in committing the unlawful acts described herein.

117. Each DEFENDANT is jointly and severally liable for the acts alleged, and Plaintiffs' injuries were proximately caused by all DEFENDANTS' conduct.

118. Plaintiffs did not, and could not reasonably, discover their claims against BROCK and the CORPORATE DEFENDANTS until they learned of similar reports from other victims and consulting legal counsel.

For Childhood Victims of Sexual Abuse

119. As amended effective January 1, 2024, § 340.1(p) provides that any case “in which the childhood sexual assault occurred on or before December 31, 2023, may only be commenced pursuant to the applicable statute of limitations set forth in existing law as it read on December 31, 2023.” Thus, Plaintiff’s right to recover damages is governed by § 340.1 as amended by Stats.2022, c. 444 (A.B. 2959), § 1, eff. Jan. 1, 2023.

120. As it existed on December 31, 2023, Code Civ. Proc. § 340.1 permitted a plaintiff to bring an action arising from childhood sexual assault prior to plaintiff attaining age 40, “or within five years from date the plaintiff discovers or reasonably should have discovered that psychological injury or illness occurring after the age of majority was caused by the sexual assault [].”

121. Thus, pursuant to the controlling iteration of *Code of Civil Procedure* § 340.1, which governs the applicable statute of limitations for civil actions arising from childhood sexual abuse, PLAINTIFFS' action is timely asserted against DEFENDANTS.

1 **BACKGROUND FACTS**

2 ***Cedars-Sinai's Culture of Concealing Sexual Misconduct***

3
4 122. CEDARS-SINAI has a stunning history of concealing allegations of sexual abuse against
5 its employees, blatantly disregarding complaints brought forward by patient-victims or their own
6 employees. Despite multiple reports of misconduct, CEDARS-SINAI routinely failed to conduct
7 thorough investigations (if at all) or take meaningful action to protect victims. This consistent failure to
8 respond reasonably to allegations allowed a pattern of misconduct to persist and worsen over time,
9 demonstrating a disregard for the safety and wellbeing of those under its care.
10

11 123. As an example, on information and belief, CEDARS-SINAI blatantly ignored numerous
12 complaints of rape and sexual assault against one of its employees for many years – before CEDARS
13 SINAI finally initiated an internal investigation and intervened. Multiple CEDARS-SINAI employees
14 over the span of 30-years faced multiple allegations of molestation, sexual assault, possession of child
15 pornography, and other heinous sexually motivated crimes.
16

17 124. No less than one hundred (100) separate lawsuits have been filed involving the
18 professional misconduct of BROCK and the within named CORPORATE DEFENDANTS, including
19 CEDARS-SINAI and CEDARS-SINAI HEALTH, which pre-date this action. Further, on information
20 and belief, multiple additional reports have been filed by current and former patients with the Medical
21 Board of California, local law enforcement, California's Office of the Attorney General, and directly with
22 DEFENDANTS CEDARS-SINAI and CEDARS-SINAI HEALTH.
23

24 125. Accordingly, at all relevant times herein, the CORPORATE DEFENDANTS were, or
25 reasonably should have been, aware of BROCK'S serial misconduct, exploitation, abuse, gross
26 misconduct, and reckless and wanton disregard for patient safety. BROCK'S misconduct violates the
27
28

1 applicable standards of care and comports with each of the Plaintiffs' individual descriptions of their
2 interactions and experiences with BROCK, as stated in detail herein.

3 126. BROCK'S sexual misconduct while at CEDARS-SINAI, CEDARS-SINAI HEALTH,
4 CEDARS-SINAI MEDICAL, CEDARS-SINAI WOMEN'S, BEVERLY HILLS, RODEO DRIVE, and
5 BROCK, INC., is well-documented, and was well known to the CORPORATE DEFENDANTS for
6 decades.
7

8 127. Despite an abundance of litigation, and all of the patient reports about BROCK'S serial
9 misconduct, exploitation, and abuse, the CORPORATE DEFENDANTS have done nothing except cover
10 up DEFENDANT BROCK'S actions from the public, law enforcement, and the very patients who have
11 entrusted their health and medical care to the DEFENDANTS named herein.
12

13 ***BROCK'S Sexual Abuse of Plaintiffs***
14

15 128. Based on information and belief, Plaintiffs allege that BROCK sexually abused countless
16 female patients, including Plaintiffs, over the course of decades. Using his position of trust and authority
17 as a highly sought after physician employed by the CORPORATE DEFENDANTS, BROCK engaged in
18 sexually exploitive misconduct including, but not limited to: directing Plaintiffs to remove their clothing
19 in front of him as he watched; performing prolonged and medically unnecessary pelvic exams; groping
20 Plaintiffs' breasts without gloves; digitally penetrating Plaintiffs' vaginas and anuses without gloves or
21 handwashing; performing sadistic pap smears, and routinely making sexually inappropriate remarks
22 regarding the size, appearance, and details of Plaintiffs' external genitalia or breasts.
23

24 129. Plaintiffs allege the CORPORATE DEFENDANTS emboldened BROCK to exploit his
25 patients by refusing to acknowledge scores of complaints made internally to staff members, nurses, and
26 other licensed physicians at CORPORATE DEFENDANTS. Complaints were met with a callous
27 indifference indicative of a culture suppressing reports of sexual misconduct. Nurses frequently
28

1 dismissed complaints made by BROCK'S patients instead warning, "best to let it lie" or that they were
2 not surprised – a clear implication BROCK had a widely known reputation for the type of interactions
3 alleged herein.

4 130. Plaintiffs further allege the CORPORATE DEFENDANTS failed to train their staff or
5 establish institutional policies for the recognition, response, and reporting of physician sexual
6 misconduct. CORPORATE DEFENDANTS failed to intervene, correct, or discipline BROCK despite
7 longstanding reports of misconduct and his reputation for sexually inappropriate interactions with
8 patients. Further, CORPORATE DEFENDANTS concealed BROCK'S known propensities and
9 history of sexually abusing his patients and instead, continued to hold BROCK out as a reputable and
10 skilled physician in the field and allowed him to continue his ongoing sexually abusive escapades,
11 resulting in harm to Plaintiffs.
12

13 131. Only when several lawsuits alleging abuse against BROCK became public, did
14 Plaintiffs come to understand the abuse perpetrated by BROCK and CORPORATE DEFENDANTS'
15 inaction. Only in the last few months have Plaintiffs come to realize that they were subjected to abuse
16 during examinations and that BROCK's conduct in those exams was inappropriate and of a sexual
17 nature, including molesting them during routine examinations and procedures.
18

19 132. BROCK'S inappropriate misconduct and comments toward his female patients knew
20 no bounds. And the female chaperones tasked with safeguarding patients against such exploitive
21 interactions failed to protect BROCK'S patients, including Plaintiffs. The CORPORATE
22 DEFENDANTS knew or reasonably should have known of the risk its agents, including BROCK,
23 posed to patients. BROCK'S sexual exploitation and abuse—and the institution's ongoing concealment
24 and cover-up of prior agent's exploitation and abuse, resulted in countless number of women, including
25 Plaintiffs, to suffer under the guise of medical care.
26
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28

1 **A. Specific Factual Allegations - Plaintiff JANE DOE #1**

2
3 133. Plaintiff JANE DOE #1 is an adult woman and was an OB/GYN patient of
4 CORPORATE DEFENDANTS and BROCK from around 2020 to 2021.

5 134. Plaintiff JANE DOE #1 became a patient of Dr. Barry BROCK on or about September
6 8, 2020, when she was thirty-one years old. She treated with BROCK at RODEO AND BEVERLY
7 HILLS OBGYN.
8

9 135. Plaintiff JANE DOE #1 believed Rodeo to be a highly rated, professional facility and
10 expected she would receive elite gynecological care. Plaintiff trusted BROCK and believed him to be
11 one of the best and most experienced OB/GYNs in the country. In fact, BROCK was recommended to
12 Plaintiff by several family members and friends as a highly-skilled physician. She held so much
13 confidence in his abilities that when he left Rodeo to establish a practice at Beverly Hills, she followed
14 him to continue care.
15

16 136. Plaintiff JANE DOE #1's first appointment with BROCK occurred on or about
17 September 8, 2020, at which time she expressed infertility concerns to him and asked to discuss
18 freezing her eggs for future fertilization. In response, BROCK dismissed her concerns and told her she
19 didn't need to freeze her eggs. BROCK said, "You are a young, attractive woman; you should have no
20 problem meeting someone – and it's more fun having kids the natural way." Plaintiff felt embarrassed
21 discussing sexual intercourse as "fun" with her physician, so she did not continue her inquiry.
22

23 137. During the same appointment, BROCK gave Plaintiff JANE DOE #1 a breast exam
24 during which he used both of his hands to "examine" her breasts and spent several moments rubbing
25 and fondling her breasts and nipples. Plaintiff has a history of breast cancer in her family, so she
26 appreciated that BROCK seemed to be conducting a thorough exam that would ensure he would catch
27 any abnormalities. While giving her the breast exam, he told her he would not recommend a breast
28

1 reduction because her breasts were “great as they are” and because “men like large breasts.” BROCK
2 also gave Plaintiff a Pap smear that involved rubbing her inner thighs and her external genitalia. At the
3 time, Plaintiff believed BROCK’s conduct to be medically legitimate. She now realizes he was sexually
4 assaulting her.

5
6 138. Plaintiff JANE DOE #1 saw BROCK a second time on or about February 4, 2021, at
7 Beverly Hills. Leading up to the appointment, she felt a sense of dread because she worried that she
8 would receive another abnormal Pap smear result. At this appointment, BROCK pulled her legs apart
9 and rubbed her external vaginal area before starting the pelvic exam. Throughout the exam, he rubbed
10 and caressed her inner thighs. Toward the end of the exam, despite the fact that Plaintiff told BROCK
11 she did not want to undergo a cervical biopsy (and refused to sign a consent form for the procedure),
12 BROCK performed the biopsy anyway, without warning Plaintiff. The procedure caused Plaintiff to
13 experience severe pain, so much so that she gritted her teeth and could not sit up after the biopsy.
14 Looking back, Plaintiff believes BROCK performed this procedure without her consent to inflict severe
15 pain on her, for his own sexual gratification.

16
17 139. Prior to Plaintiff JANE DOE #1’s first appointment with BROCK, Plaintiff had been a
18 patient of former OB/GYN James Heaps. Heaps was forced to leave UCLA in 2018 due to accusations
19 of sexual misconduct (which later led to multiple criminal convictions). Plaintiff had treated with Heaps
20 since she was seventeen years old and underwent twelve years of gynecological care (until 2018) before
21 she realized that Heaps’ conduct in the exams was not medically necessary and sexually motivated.

22
23 140. Plaintiff JANE DOE #1 was devastated by the abuse she suffered at the hands of Heaps.
24 She struggled with PTSD and flashbacks and could not bring herself to see another gynecologist for
25 two years. Such neglect was dangerous for Plaintiff, as Plaintiff had a history of issues that put her at
26 higher risk of developing cervical cancer. Plaintiff had a history of abnormal Pap smear results and
27
28

1 HPV and struggled with severe pain associated with interstitial cystitis and fibromyalgia. Prior to her
2 diagnoses, she was misdiagnosed several times and forced to live with unrelenting pain.

3 141. After being abused by Heaps, Plaintiff JANE DOE #1 was hesitant to see another male
4 doctor; however, she ignored her discomfort and told herself that she needed to trust that BROCK was
5 acting appropriately so that she could stay healthy. Throughout her treatment with BROCK, Plaintiff
6 had a difficult time making it through her exams and felt uncomfortable being touched. However, she
7 believed that the incidents involving Heaps were highly unusual and did not fathom she would be
8 abused again. She believed that her discomfort while treating with BROCK was as a result of the
9 emotional trauma she endured when abused by Heaps and that she was overreacting to what occurred
10 during BROCK's examinations of her.
11

12 142. Plaintiff JANE DOE #1 has only recently realized that BROCK's conduct was
13 perpetrated not because of legitimate medical need, but for BROCK's own sexual gratification. As a
14 result of that realization, Plaintiff has had to deal with tremendous upset and anxiety. This distress is
15 compounded by the fact that she suffered abuse perpetuated by BROCK when she was still recovering
16 from the aftermath of being abused by Heaps. Plaintiff will now never again see or trust another male
17 gynecologist and struggles interacting with male physicians regardless of specialty, which has
18 hampered her routine medical care.
19

20
21 **B. Specific Factual Allegations - Plaintiff JANE DOE #2**

22 143. When Plaintiff JANE DOE #2 secured her first well-paid job, she was very excited to
23 establish her health care at Cedars, rather than the integrated healthcare system she had grown up with,
24 because she understood that Cedars was the "best of the best" in Southern California. In 2013, she
25 started seeing her primary care doctor at Cedars. In 2015, when she started thinking seriously about
26 trying to get pregnant, her primary care doctor referred her to BROCK. Her primary care doctor
27
28

1 explained that BROCK had delivered his own children, and based in part on that recommendation, and
2 in part on Cedars' stellar reputation in the community, Plaintiff JANE DOE #2 placed her trust and
3 confidence in BROCK to provide her with top quality gynecological care. Plaintiff JANE DOE #2 was
4 a patient of BROCK's for multiple visits between 2015 and 2017.

5
6 144. Plaintiff JANE DOE #2 trusted the physicians at Cedars implicitly. BROCK garnered
7 her trust and confidence, which he then took advantage of in order to sexually abuse and harass her.

8 145. BROCK's vaginal examinations of Plaintiff JANE DOE #2 were much longer than she
9 was used to. But again, trusting Cedars' reputation, she wrote off what she now knows to have been
10 overly lengthy, non-medical vaginal exams to BROCK's being "thorough." Plaintiff JANE DOE #2
11 was lulled into the belief that she was being provided with high quality pre-natal care by a skilled
12 obstetrician and gynecologist, while she now knows that she was being sexually harassed, assaulted
13 and abused by him.

14
15 146. When BROCK performed his vaginal exams on her, and when he inserted the speculum
16 for Pap tests, he would massage Plaintiff JANE DOE #2's legs, starting from her upper thigh and going
17 down and back up her legs. Plaintiff now understands that this contact is not a part of legitimate
18 healthcare, but was done to sexually harass and abuse her and to sexually gratify BROCK.

19
20 147. During the time that she was a patient of BROCK's, he also performed what Plaintiff
21 JANE DOE #2 now knows to have been sexually abusive breast exams. BROCK would perform these
22 "exams," with her sitting up, facing him, using both hands at the same time to hold and caress her
23 breasts. BROCK would also spend what she now knows to have been an extended period of time
24 "examining" her breasts in this manner. At the time, again, Plaintiff believed that that she was being
25 provided high quality care by a skilled gynecologist at a reputable clinic, while she now knows that she
26 was being sexually harassed, assaulted and abused by BROCK.
27
28

1 148. Plaintiff is an anxious person by nature. For example, she went into her relationship
2 with BROCK concerned that she might have HPV, based on her husband's history. BROCK would
3 laugh and make light of her concerns, telling her that she was "so young," telling her that she was so
4 "beautiful," and that "everything was fine," while not actually addressing the questions she brought to
5 his attention. BROCK would have an assistant in the room when he said these things to her, but the
6 assistant would just laugh along at the inappropriate things BROCK was saying, making Plaintiff JANE
7 DOE #2 believe that she must be misinterpreting what was happening in his office. Plaintiff JANE
8 DOE #2 now understands that BROCK's comments to her were intended to, and did distract her from
9 the liberties he was taking with her during her appointments.
10

11 149. During Plaintiff's last visit to BROCK in 2017, BROCK asked her when she was going
12 to finally get pregnant. BROCK told her that he would take good care of her and her baby, and that he
13 would give her a "husband stitch" after the birth of her baby to keep her husband happy.
14

15 150. Plaintiff now knows that the length of her vaginal exams, the caressing of her legs,
16 along with the fondling nature of her breast exams were all unnecessary and that these exams were
17 performed in a non-medical manner. Plaintiff JANE DOE #2 also now knows that BROCK's
18 comments were not relevant, nor were they a part of legitimate healthcare, but were meant to flatter
19 her, and to keep her off balance so that he could more easily take advantage of her to sexually harass
20 and abuse her, and to sexually gratify himself.
21

22 151. When Plaintiff JANE DOE #2 learned that BROCK was being sued for his sexually
23 harassing, abusive, and unprofessional conduct involving patients, she realized that what he did to her
24 over the two years that she was his patient was in fact sexually abusive.
25

26 152. Because BROCK took advantage of Plaintiff JANE DOE #2 during these very
27 vulnerable exams to abuse her, Plaintiff JANE DOE #2 has experienced feelings of betrayal,
28

1 humiliation, depression and anxiety, which have resulted in physical manifestations of that distress
2 including sleeplessness and lack of focus.

3
4 **C. Specific Factual Allegations - Plaintiff JANE DOE #3**

5 153. Plaintiff JANE DOE #3 saw Dr. Barry BROCK in or about 2019 for pre-natal care at
6 RODEO. Plaintiff believed Rodeo to be an elite medical provider that hired high-quality physicians.
7 Instead of receiving the professional care she expected, Plaintiff was subjected to repeated sexual abuse
8 by BROCK.
9

10 154. Throughout Plaintiff's pregnancy, BROCK took advantage of her trust to perform
11 procedures that were unnecessary and sexually motivated. Plaintiff was required to attend pre-natal
12 appointments approximately every month, during which time BROCK would require her to undergo a
13 vaginal "exam." This "exam" entailed BROCK inserting and moving his fingers in and out of Plaintiff's
14 vagina repeatedly in a manner that Plaintiff now realizes was not medically necessary. He would begin
15 these exams by roughly and aggressively moving his fingers in and out of her vagina and then finish
16 by gently moving his fingers in and out of her body in a manner that, looking back, Plaintiff believes
17 was designed to mimic sexual intercourse.
18

19 155. While conducting these unnecessary vaginal exams, BROCK would casually brush his
20 fingers against Plaintiff's external vaginal area. The mere contact with that area felt stimulating and
21 alarming to Plaintiff. At the time, Plaintiff assumed BROCK was not able to avoid touching her in that
22 manner in the process of conducting a thorough vaginal exam. At all times, Plaintiff believed BROCK
23 was performing procedures that would help ensure she would deliver a healthy baby.
24

25 156. When Plaintiff attended her five-month pre-natal appointment, she discovered that her
26 baby no longer had a heartbeat. BROCK seemed unfazed that Plaintiff had lost her baby and sent her
27 home, telling her he would let her know when he could get her in to induce labor. Plaintiff was not able
28

1 to get an appointment at Rodeo immediately and had to wait several days before being induced by
2 another physician (BROCK was not available). Plaintiff delivered a stillborn child.

3 157. Over the last five years, Plaintiff has had to struggle with incredible grief over losing
4 her child. Only recently did she realize that the procedures BROCK required her to undergo – and the
5 way he performed them – were sexually abusive. Since that realization, she has struggled with
6 significant emotional trauma.
7

8 **D. Specific Factual Allegations - Plaintiff JANE DOE #4**

9

10 158. Plaintiff JANE DOE #4 had been a long-time patient of Cedars when sometime between
11 2012 and 2014, her primary care physician referred her to BROCK because she was having heavy and
12 painful periods. Plaintiff JANE DOE #4 trusted her primary care physician, and for that reason, and
13 because Cedars was such a well-respected healthcare provider in the community, she at all times
14 believed that BROCK was a highly skilled gynecologist who would provide her with excellent
15 healthcare and who would finally be able to provide her with some relief from her painful periods.
16 Plaintiff JANE DOE #4 saw BROCK two times, attempting to address her medical issue.
17

18 159. During her first appointment, while she was undressed, and in the stirrups, the nurse left
19 the room and left the door open. Plaintiff JANE DOE #4 assumed that the nurse left the door open so
20 that nothing inappropriate could happen in an examination room. BROCK then grabbed her legs to
21 “scooch” her down, but then, when she was in position, he touched her in a way that she now knows
22 was not professional and not a part of legitimate healthcare. BROCK grabbed and fondled her upper,
23 inner thigh, with his thumb at the very top of her thigh and held her there throughout the entire vaginal
24 exam.
25
26
27
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1 160. At the time, during what she now knows to have been this sexual assault, Plaintiff JANE
2 DOE #4 trusted Cedars' and BROCK's reputations. Plaintiff JANE DOE #4 had been molested as a
3 child, but told herself that BROCK and Cedars would not be involved in improper examinations.

4 161. Plaintiff JANE DOE #4 was lulled into the belief that she was being provided with high
5 quality gynecological care by a skilled obstetrician and gynecologist, while she now knows that she
6 was being sexually harassed, assaulted and abused by BROCK.

7
8 162. Except for one outpatient procedure, Plaintiff has not seen a gynecologist since
9 BROCK. Even though Plaintiff at all times doubted herself and trusted that Cedars and BROCK were
10 providing her with professional and skilled care, Plaintiff has continued to endure her painful periods
11 each month rather than risk what she mistakenly believed was only her own discomfort experienced
12 during her gynecological visits with BROCK.

13
14 163. When Plaintiff JANE DOE #4 learned that BROCK was being sued for his sexually
15 harassing, abusive, and unprofessional conduct involving patients, she started to cry and realized that
16 she had not been "overreacting" to him based on her earlier childhood trauma, but that what he did to
17 her was in fact sexually abusive.

18
19 164. Because BROCK took advantage of Plaintiff JANE DOE #4 during these very
20 vulnerable exams to abuse her, Plaintiff JANE DOE #4 has experienced feelings of betrayal,
21 humiliation, depression and anxiety, which have resulted in physical manifestations of that distress
22 including sleeplessness and lack of focus.

23
24 **E. Specific Factual Allegations - Plaintiff JANE DOE #5**

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26 165. Plaintiff JANE DOE #5 was a patient of Dr. Barry BROCK's from on or about May 2,
27 2011, to on or about September 7, 2016. Plaintiff was referred to BROCK because she suffered from
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1 severe uterine fibroids and understood BROCK to be a highly skilled physician who specialized in
2 fertility and pre-natal care.

3 166. Plaintiff wanted to have children; therefore, it was of utmost importance to her to
4 remove the fibroids so she could become pregnant – a fact she told BROCK at her first appointment.
5 Instead of responding to Plaintiff's struggles with infertility and advising her accordingly, BROCK
6 recommended that Plaintiff forgo a myomectomy in lieu of a hysterectomy to surgically remove the
7 fibroids. BROCK's suggestion was distressing to Plaintiff, as undergoing a hysterectomy would mean
8 that she could not have children.

9 167. When BROCK gave Plaintiff a vaginal exam during her first appointment, he required
10 her to lie naked on the exam table, without a privacy covering. While he was performing the exam, he
11 made comments about Plaintiff's infertility and uterus. For example, BROCK remarked, "Just take it
12 all out [referring to Plaintiff's uterus]. Get your husband to buy you a bauble [a little trinket] instead."
13 BROCK's callous commentary was extremely upsetting to Plaintiff, especially as she wanted children.

14 168. At the end of the appointment, Plaintiff reiterated to BROCK that she hoped to have
15 children and pleaded for him to give her a myomectomy instead. BROCK agreed and performed the
16 myomectomy May 20, 2011.

17 169. On or about May 25, 2011, Plaintiff saw BROCK at the Cedars Sinai Medical Group
18 office for her myomectomy post-op appointment. Afterward, Plaintiff chose to discontinue seeing
19 BROCK because she still felt upset that he did not seem to take her desire to become pregnant seriously.

20 170. Several years later, Plaintiff again contacted Cedars-Sinai and requested a gynecological
21 and fertility specialist. To her surprise, Cedars recommended that she see BROCK at RODEO. Plaintiff
22 did not understand why Cedars would send her to a physician outside of their practice, especially since
23 she did not ask for him and had coverage through Cedars, meaning that she could have been referred
24 to any of the OBGYN doctors on staff. Because Cedars-Sinai kept scheduling her with BROCK,
25 Plaintiff believed he was the best Cedars-Sinai had to offer and the most skilled in the treatment of
26 gynecological disorders and infertility.
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1 171. On September 7, 2016, Plaintiff attended an appointment with BROCK at Rodeo.
2 During that appointment, BROCK gave Plaintiff a prolonged breast exam that involved “examining”
3 and pinching her nipple. Throughout the breast exam, which seemed to last several moments, BROCK
4 rested his hand on Plaintiff’s breast when the exam was (seemingly) over, while casually talking with
5 her. At the time, Plaintiff believed BROCK was providing thorough medical care. She now realizes he
6 took advantage of her vulnerability to sexually assault her.

7 172. During that same exam in 2016, BROCK gave Plaintiff an overly aggressive and
8 prolonged vaginal exam that involved him inserting his fingers and moving them roughly inside her
9 body. While he was moving his fingers, he held eye contact with Plaintiff and said, “God you’re tight.”
10 At the same time, he took his other hand and – without using a glove – rested it on her abdomen.
11 Throughout Plaintiff’s time as his patient, BROCK made numerous inappropriate comments of a sexual
12 nature and comments which she now realizes were designed to demean and groom her, such as, “When
13 was the last time you had sex because I can’t get this thing in?” [referring to the speculum], “When
14 was the last time you had sex because you’re so tight?” and “If you’d just see a nutritionist, you’d be
15 cuter.”

16 173. Throughout the time Plaintiff saw BROCK, she was terribly upset by his comments
17 regarding her infertility and his general demeanor, but believed she was overly sensitive. In fact, after
18 Plaintiff’s initial appointment with BROCK, she reported him to her primary care physician at Cedars-
19 Sinai. Plaintiff complained that BROCK made terrible comments regarding her infertility – and that
20 his bedside manner was unacceptable and unprofessional. Her primary care physician disregarded
21 Plaintiff’s report and made her feel as if she was overreacting, saying something to the effect of, “That’s
22 how he is.” Neither her primary care physician, nor anyone from Cedars-Sinai, contacted Plaintiff to
23 gather more information or investigate Plaintiff’s complaint against BROCK. As a result of Cedars’
24 failure to respond to Plaintiff’s complaint, Plaintiff was lured into a false sense of security – and even
25 worse, had to endure additional sexual abuse at the hands of BROCK.

26 174. After Plaintiff’s final appointment in or about 2016, she decided to discontinue care
27 with BROCK. Plaintiff had not fully recovered from BROCK’s insensitive comments regarding her
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1 infertility issues and, even years later, found she still did not care for his bedside manner. Plaintiff left
2 his practice and did not find a new gynecologist until in or about 2021. Looking back, Plaintiff realizes
3 her hiatus was especially dangerous, given the fact that her mother passed away from cervical cancer.

4 175. When Plaintiff learned that BROCK was being sued for his sexually harassing, abusive,
5 and unprofessional conduct involving patients, she realized that what he did to her over the years that
6 she was his patient was in fact sexually abusive. Plaintiff now understands that BROCK's physical
7 contact with her was not a part of legitimate healthcare but was done to sexually harass and assault her
8 and to sexually gratify BROCK.

9 176. As a result of BROCK's pervasive inappropriate and sexually harassing and abusive
10 conduct, Plaintiff has suffered and continues to suffer from severe emotional trauma. She now fears
11 OB/GYN exams, however given her mother's history with cervical cancer, forces herself to keep up
12 with her care.

13 **F. Specific Factual Allegations - JANE DOE #6**

14 177. When Plaintiff JANE DOE #6 went into labor in 2014, Dr. Barry BROCK was the
15 obstetrician on call at Cedars-Sinai Medical Center. Even though BROCK was not Plaintiff's regular
16 obstetrician, she understood that Cedars only hired professional and experienced physicians and
17 expected she would be safe in his hands.

18 178. When Plaintiff was laboring in her delivery room, BROCK told her that he would need
19 to examine her. Part of his "exam" included a breast exam, where he touched and fondled her breasts.
20 At the time, she did not know what he was looking for but thought that she, as a lay person, should not
21 question his techniques. She wanted to have a healthy delivery and baby and put complete trust in his
22 abilities and discretion.

23 179. Plaintiff experienced a grueling and difficult labor, prior to delivering her son. She was
24 six days past her due date and understood that her baby would be over ten pounds. While she was
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1 pushing, and as BROCK was guiding her through the delivery, BROCK's phone rang. Without
2 removing his gloves, he answered his phone and discussed his dinner plans for later that evening. After
3 the phone call, he began touching her intimate areas again, without washing his hands or changing his
4 gloves.

5
6 180. After Plaintiff had labored for three hours, BROCK tried to suction the baby out of her
7 body with a vacuum. Plaintiff understood that due to the size of her baby, she may need to undergo a
8 C-section, however BROCK was intent on doing everything possible purportedly to ensure a natural
9 delivery. He instructed her to continue pushing until her sciatic nerve burst. BROCK rushed her into
10 the operating room to perform a C-section. Following the delivery, she could not walk for several weeks
11 and had to undergo five months of physical therapy before she could lift her child.

12
13 181. Plaintiff only recently discovered that BROCK's conduct during her delivery was
14 devoid of medical legitimacy. She now knows that that he took advantage of her trust and vulnerability
15 to conduct unnecessary intimate exams – and performed those exams in a sexual manner, for his own
16 gratification. As a result of that realization, she has experienced severe emotional distress.

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18 **G. Specific Factual Allegations - JANE DOE #7**

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20 182. Plaintiff JANE DOE #7's first ever gynecological exam was performed by BROCK on
21 or about May 2, 2013 – the date of Plaintiff's eighteenth birthday. Plaintiff made an appointment on
22 the advice of her mother, who had also treated with BROCK. In fact, BROCK was the obstetrician who
23 had delivered Plaintiff.

24
25 183. Based on the fact that her mother trusted BROCK and on Cedars-Sinai Medical Center's
26 elite reputation in the Los Angeles medical community, Plaintiff placed tremendous faith in BROCK,
27 believing that his examinations, physical contact and comments to her were medically necessary and
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appropriate. Both Cedars and BROCK betrayed Plaintiff's trust, sexually abusing and harassing her on or about her first day of adulthood.

184. Plaintiff felt extremely nervous and apprehensive, leading up to her appointment with BROCK. Plaintiff expected that her mother would accompany her during the exam; however, when she arrived, BROCK told her she had to be examined alone. Even worse, BROCK, despite knowing it was Plaintiff's first gynecological exam, decided to examine her without the presence of a chaperone. Though Plaintiff was barely 18 years old, BROCK made Plaintiff feel that she now needed to "act like an adult" and endure his "exam" without her mother or another chaperone.

185. At the beginning of her appointment, as Plaintiff sat on the table wearing her privacy gown, BROCK asked her, "[A]re you still a virgin?" Plaintiff said that she was, and BROCK responded that, "[Y]ou won't be a virgin for long because you are beautiful." He gave her a pelvic exam, using his bare, ungloved fingers. At the same time, he pressed his leg against Plaintiff's inner thigh. Looking back, Plaintiff cringes at the realization that he had an erection and that she could feel it through his pants. While conducting the exam, he commented, "You are very tight." Although Plaintiff was embarrassed to hear BROCK, an adult, male doctor, making these comments about her vagina, she assumed they were medically motivated.

186. During the same appointment, BROCK administered a breast exam that involved rubbing and stimulating her nipples. Plaintiff felt humiliated and tried her best to disassociate from what was happening, expecting this would be the first of many uncomfortable gynecological exams that she would need to submit to as a woman, in order to monitor and safeguard her health.

187. Throughout the exam, Plaintiff felt extremely uneasy. In the ensuing years, Plaintiff often flashed back to the exam, as it was the first time that she was touched in what she now realizes was a sexual manner. Because she was so young and had no basis for comparison (and because this

egregious sexual abuse had been perpetuated against her in the guise of medical care), she did not comprehend that she had been sexually assaulted. However, Plaintiff now understands that, in fact, BROCK was touching and rubbing an eighteen-year-old's body with the intent of sexually stimulating her.

188. In or about late 2024, Plaintiff learned of the allegations made against BROCK. Plaintiff began to reflect on her own experiences and realized that she had been sexually abused during her appointment with BROCK. Plaintiff has recently come to understand that the conduct that made her feel uncomfortable, but which she assumed was inherent in legitimate gynecological examinations, was wrongful sexual contact by a trusted family physician. Realizing that she was sexually molested by someone whom she and her family trusted has left her with feelings of betrayal and disappointment.

189. Moreover, Plaintiff's realization that she was sexually abused by BROCK has also led to strain in her relationship with her mother, as her mother was also BROCK's patient and brought Plaintiff to him. Plaintiff has also learned that her mother experienced sexual abuse at the hands of BROCK. Plaintiff's knowledge of her mother's feelings of guilt for referring her to BROCK (and of her mother's own abuse) has only compounded Plaintiff's significant emotional distress.

H. Specific Factual Allegations - JANE DOE #8

190. Plaintiff JANE DOE #8 underwent a major surgery in 2020 to treat uterine fibroids and ovarian cysts. When the fibroids reappeared in 2021, her good friend, who was 20 years her senior, told her that BROCK was a skilled gynecologist and would be the physician to address and finally resolve her issues. Based upon her friend's recommendation and Cedars standing in the community, Plaintiff made an appointment to see BROCK at Cedars Sinai Medical Group offices.

191. When Plaintiff JANE DOE #8 arrived for her visit with BROCK, the nurse told her that BROCK required a breast exam during her visit. She told the nurse that she did not want or need a

1 breast exam as she was there to address her fibroids. BROCK then came in and was adamant that he
2 was going to perform a breast exam, which Plaintiff again declined. While she held firm, Plaintiff
3 JANE DOE #8 was then uncomfortable and not at ease. BROCK nonetheless garnered Plaintiff JANE
4 DOE #8's trust and confidence during this appointment, extolling his credentials and assuring her that
5 he was the physician who would address her fibroids once and for all, which trust and confidence he
6 then took advantage of in order to sexually abuse and harass her.

8 192. During this appointment, BROCK performed what Plaintiff JANE DOE #8 now knows
9 to have been an overly lengthy vaginal examination, throughout which he asked her many questions.
10 At the time, she trusted that the length of that intrusive examination was medically necessary in order
11 to diagnose and treat her serious medical condition. Plaintiff JANE DOE #8 now knows that the length
12 of the examination and the many questions were intended to distract her from the liberties he was taking
13 with her body to sexually abuse her and to sexually gratify himself.

15 193. During her vaginal exam, BROCK appeared to become visibly aroused. There was no
16 nurse in the room and Plaintiff JANE DOE #8 was alone with BROCK when it happened. Unsure of
17 how or whether she should respond, Plaintiff JANE DOE #8 pretended like she had not seen BROCK's
18 erection.

20 194. When Plaintiff JANE DOE #8 returned home, shaken by her interaction with BROCK,
21 she told her boyfriend what had happened during her appointment, and he told her that he was sure that
22 BROCK was just doing his job, and reminded her that he was a reputable physician, in a reputable
23 clinic, which made her feel like she must have overreacted to the situation or been wrong in believing
24 that BROCK appeared to be sexually aroused.

26 195. Plaintiff JANE DOE #8 also endured inappropriate and intrusive questions about her
27 sexual relationships, preferences, whether she used condoms and so forth, from BROCK. BROCK also
28

commented that her partner, being significantly older than she, was “one lucky guy.” At the time, she believed that the intrusive questions bore some relation to recurrence and/or treatment of her fibroids, based on Cedars’ and BROCK’s reputations, and her belief that she was being provided with high quality care by a skilled gynecologist. Plaintiff JANE DOE #8 now knows that BROCK performed an exam in a non-medical manner and asked about her sex life for no other reason than his own sexual gratification and to sexually harass and abuse her.

196. Following this appointment, BROCK called her at home, late one evening, long after office hours were over, to discuss medications with her. Following this phone call, Plaintiff JANE DOE #8 never went back to BROCK for any further treatment.

197. Upon returning to Los Angeles, after time away, Plaintiff JANE DOE #8 saw a picture of BROCK online, shown in conjunction with allegations of sexual misconduct with patients. As she got chills and began to cry, she understood that what had happened to her at the hands of BROCK was not routine gynecological care, nor legitimate preparation to treat her fibroids, but was in fact sexual abuse and harassment, under the guise of medical treatment.

198. Since her realization that BROCK took advantage of Plaintiff JANE DOE #8’s severe medical condition (a painful recurrence of her uterine fibroids) to sexually abuse her, Plaintiff JANE DOE #8 has experienced feelings of betrayal, humiliation, depression, anxiety, intrusive thoughts and other symptoms of PTSD which have resulted in physical manifestations of that distress including sleeplessness and lack of focus.

I. Specific Factual Allegations - JANE DOE #9

199. Plaintiff JANE DOE #9 made an appointment with Dr. Barry BROCK on or about November 12, 2020, on the advice of her co-worker. Plaintiff had struggled with painful uterine fibroids and needed to see a specialist to receive a second opinion on whether she needed a hysterectomy.

1 Because BROCK came highly recommended and practiced at RODEO, an OB/GYN practice
2 specializing in pregnancy, high-risk obstetrics, and gynecology, Plaintiff believed she would receive
3 high-quality, professional medical care. Instead, she was subjected to sexual abuse and harassment.

4 200. Throughout Plaintiff's vaginal exam, BROCK rubbed her calf and her inner thigh in
5 what she now understands was a non-medical manner and for his sexual gratification. After the vaginal
6 exam, and while Plaintiff was still exposed, BROCK stated that Plaintiff was "very tight down there"
7 and that it was "good for [her] husband or boyfriend." Plaintiff felt so humiliated by BROCK's
8 comments that she reported BROCK to the Rodeo Office Manager, Alex Baskin. She described
9 BROCK's inappropriate comments to Baskin and reported that a chaperone was not present during her
10 exam. Baskin listened to her concerns, however after they spoke, she was never contacted about the
11 matter again. About a month after reporting BROCK, Plaintiff received an automated message from
12 Rodeo that BROCK would be leaving the practice and moving to Beverly Hills Medical Plaza on
13 January 1, 2021. Because no one ever followed up with Plaintiff or officially acknowledged her
14 complaint – and because BROCK seemingly moved on to a bigger practice, Plaintiff believed that
15 BROCK's comments must not have been as serious as she thought and that she had overreacted.

16 201. Prior to her interactions with BROCK, Plaintiff JANE DOE #9 had treated with former
17 OB/GYN Dr. James Heaps – and suffered sexual abuse during her exams. Heaps was forced to leave
18 UCLA in 2018 due to accusations of sexual misconduct (related to which he later received multiple
19 criminal convictions). Plaintiff was still dealing with symptoms of post-traumatic stress when she
20 began to see BROCK and was especially vulnerable as a survivor of prior sexual abuse. Plaintiff had a
21 difficult time making it through her exams with BROCK and felt uncomfortable being touched.
22 However, she believed that any discomfort she felt was a result of the PTSD she was struggling with
23 after being sexually abused by Heaps. She ignored her discomfort and told herself that she needed to
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1 trust that BROCK was acting appropriately so that she could stay healthy. Plaintiff JANE DOE #9
2 believed that the incidents involving Heaps were highly unusual and did not fathom she would get
3 abused again.
4

5 202. As a result of being sexually abused by BROCK, Plaintiff JANE DOE #9 has
6 experienced significant emotional upset and anxiety. She no longer trusts male OB/GYN doctors and
7 will now only see female doctors.
8

9 **J. Specific Factual Allegations - JANE DOE #10**

10 203. Plaintiff JANE DOE #10 has been a patient at Cedars for over 20 years. When she
11 became pregnant in 2009, she was referred to BROCK because she had recently been diagnosed with
12 a serious medical condition, which threatened her life and made her pregnancy “high risk,”
13 necessitating her placement with a specialist. She was referred to BROCK, whom she was told had
14 more than 25 years of experience, and was the physician that could best help her to deliver a healthy
15 baby. Plaintiff JANE DOE #10 was told and believed that BROCK was a skilled obstetrician and
16 gynecologist, as well as experienced regarding her condition, and therefore placed her trust in him.
17 BROCK garnered Plaintiff JANE DOE #10’s trust and confidence which he then took advantage of in
18 order to sexually abuse and harass her.
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21 204. Plaintiff JANE DOE #10 was under the care of BROCK during her pregnancy from late
22 2009 into 2010. She was in a very fragile and vulnerable state during this pregnancy given her newly
23 diagnosed medical condition and had legitimate worries about her own health and delivering a healthy
24 baby. Plaintiff JANE DOE #10 relied heavily on BROCK and Cedars’ assurances that BROCK was
25 the physician who could provide a high standard of care for her and her baby. She placed her trust and
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1 confidence in him, believing that the healthcare providers at Cedars, and BROCK, in particular, were
2 trustworthy and skilled and could ensure a successful delivery.

3 205. During the time that she was a patient of BROCK, Plaintiff JANE DOE #10 was lulled
4 into the belief that she was being provided with high quality care by a skilled obstetrician and
5 gynecologist, while she now knows that she was being sexually assaulted and abused by him.
6

7 206. During her first visit with BROCK, Plaintiff JANE DOE #10 underwent what she now
8 knows to have been an overly lengthy and unnecessary breast exam, and what she now knows to have
9 been an unreasonably lengthy, physically forceful, and unnecessarily invasive pelvic exam. Plaintiff
10 JANE DOE #10 now understands that she did not need that breast exam at all, as all her records were
11 at Cedars, she was not a “new patient” and also because she had just recently had a breast exam with a
12 female obstetrician right before her referral to BROCK. Plaintiff JANE DOE #10 was led to believe,
13 at the time, that she needed this breast exam (and lengthier pelvic exam) due to the “high risk” nature
14 of her pregnancy. Plaintiff JANE DOE #10 now understands that BROCK performed these exams in a
15 non-medical manner for no other reason than his own sexual gratification and to sexually harass and
16 abuse her.
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19 207. During all but one of the monthly, semi-monthly, and then weekly visits during her
20 pregnancy, BROCK likewise performed what Plaintiff JANE DOE #10 now knows to have been overly
21 lengthy, physically forceful, and unnecessarily invasive pelvic/vaginal exams. (The one time he didn’t
22 perform a vaginal exam was the one and only time that her husband accompanied her to her
23 appointment.) It was very stressful to Plaintiff JANE DOE #10 to know that BROCK “was going to
24 be inside her,” in a very aggressive way, during every single visit to his office. At the time, Plaintiff
25 JANE DOE #10 was again led to believe that her newly diagnosed condition made these numerous and
26 overly aggressive exams necessary. She now knows that the way the vaginal exams were performed,
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1 as well as the frequency of the vaginal exams, were not medically necessary or appropriate and were
2 not a part of legitimate medical care but were done in a manner to physically intimidate Plaintiff JANE
3 DOE #10, to sexually abuse Plaintiff JANE DOE #10, and sexually gratify BROCK.

4 208. During her second to last visit before her delivery, during her vaginal exam to check her
5 dilation, BROCK looked intently into her eyes, rather than looking at her cervix. Again, at the time,
6 she could not process the meaning of that uncomfortable eye contact, because she was told and believed
7 that she needed BROCK for the safe delivery of her baby during her own medical crisis. She now
8 knows that that uncomfortable eye contact was not part of legitimate medical care but was done in a
9 manner intended to sexually intimidate, harass and abuse her under the guise of a routine medical
10 examination.
11

12 209. While in labor, Plaintiff JANE DOE #10 was offered a medication that she was told
13 would relax her. Plaintiff JANE DOE #10 was told she was allowed to take that medication three (3)
14 times over the course of 3 hours, that it would not harm the baby but would relax her and allow her
15 labor to progress. At the time of her second dose, she asked for an epidural. She took that second dose,
16 as offered, to relax her in preparation for the placement of the epidural. She was nervous and anxious
17 about the large epidural needle going into her back and hoped the medication would help her to be
18 calmer. At that time, BROCK came into the room and asked her, aggressively, what she was doing
19 taking that medication, “[W]as she trying to get a fix?” “[W]as she trying to get high?” Plaintiff was
20 distressed by these comments especially given her medical problems and the fact that she was in active
21 labor at the time.
22

23 210. Due to the high-risk nature of her delivery, NICU personnel arrived in the delivery room
24 to assess her baby immediately following the delivery. At that time, while she was still in the delivery
25 room, BROCK roughly and forcefully pulled up her gown to expose her breasts, purportedly to put her
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1 baby on her chest, and then further embarrassed her in front of all those present when he loudly
2 chastised her for wearing a bra during her delivery.

3 211. Following her high-risk delivery, Plaintiff JANE DOE #10 told her husband to go with
4 the baby, and he did. BROCK took an inordinately long time sewing her up after her delivery. Her
5 epidural had worn off to the point that she could feel every single pull of the suture as BROCK
6 performed the procedure. While she was exhausted from a very long labor and difficult delivery, she
7 did not process this at the time. Looking back with hindsight, she now believes that BROCK took
8 pleasure in her discomfort and was sexually gratified by it. While BROCK was sewing her up, her
9 husband asked, “[S]he tore?” to which BROCK answered “[Y]es. But don’t worry, I’ll throw in a
10 stitch for you.” Plaintiff JANE DOE #10 now knows that BROCK’s statements were not a part of
11 legitimate medical care but were meant to objectify and dehumanize her and were made for his own
12 sexual gratification.
13

14 212. At her six-weeks post-partum visit, Plaintiff JANE DOE #10 asked BROCK if he could
15 extend her maternity leave because she was not ready to go back to work. He told her that there was
16 no medical reason justifying an extension of her leave. BROCK, nonetheless, had her come back to
17 his office at 11 weeks post-partum, where he again performed an overly lengthy and invasive vaginal
18 exam, telling her that she “looked great” and that her “husband was going to be a very happy man.”
19 She now believes that this second post-partum visit, and this additional sexually abusive vaginal exam
20 were unnecessary and not a part of legitimate medical care.
21

22 213. Plaintiff JANE DOE #10 did not go to BROCK’s office but continued to see her primary
23 care doctor for regular annual and bi-annual non-gynecological visits from 2010 through 2018. In
24 2018, Plaintiff JANE DOE #10 and her husband decided to try to have another baby, so Plaintiff JANE
25 DOE #10 called BROCK’s office at Cedars to make an appointment for a wellness exam to ensure that
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1 she was healthy enough to try to conceive. She was told that BROCK no longer worked there. When
2 she asked the nurse, at her appointment, what happened to him, the nurse stated, “You know, people
3 are sensitive.” Plaintiff JANE DOE #10 now believes that this meant that BROCK had complaints
4 lodged against him, and that Cedars at all times knew about these complaints but failed to inform his
5 patients of these complaints or to take steps to investigate his sexually abusive behavior with patients
6 when those events were occurring.
7

8 214. Only after learning that BROCK had been sued for sexual misconduct involving
9 patients, did Plaintiff JANE DOE #10 come to understand what had been done to her by BROCK’s
10 misconduct and Cedars’s inaction. Plaintiff JANE DOE #10 has now come to realize that BROCK’s
11 conduct in her exams was inappropriate and of a sexual nature, including abusing, molesting, harassing
12 and intimidating her under the guise of performing routine medical examinations.
13

14 215. Because BROCK took advantage of Plaintiff JANE DOE #10’s vulnerability and fear,
15 especially regarding her serious medical problems (and concomitant fears about her baby’s health as a
16 result), to abuse her, Plaintiff JANE DOE #10 has experienced feelings of betrayal, humiliation,
17 depression, anxiety, intrusive thoughts and other symptoms of PTSD which have resulted in physical
18 manifestations of that distress including sleeplessness and lack of focus.
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20 **K. Specific Factual Allegations - JANE DOE #12**
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22 216. In 2015, through in vitro fertilization, Plaintiff JANE DOE #12 became pregnant at the
23 age of 42. Her ‘advanced maternal age’ and her conception through in vitro fertilization making her
24 pregnancy ‘high-risk,” Plaintiff JANE DOE#12 sought prenatal care from BROCK in the Cedars clinic
25 on Robertson because she had heard that he had a good reputation for treating patients with high-risk
26 pregnancies. Plaintiff JANE DOE#12 also chose BROCK because he was associated with Cedars. She
27 understood that the doctors at Cedars would provide her with the very best in prenatal care. Plaintiff
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1 placed her trust and confidence in BROCK believing that the healthcare providers at Cedars, and
2 BROCK, in particular, were trustworthy and skilled.

3 217. BROCK garnered Plaintiff JANE DOE#12's trust and confidence which he then took
4 advantage of in order to sexually abuse and harass her.

5 218. During each of Plaintiff JANE DOE#12's pre-natal visits, BROCK performed what
6 Plaintiff now knows to have been overly lengthy vaginal examinations. BROCK performed these
7 "examinations" without a chaperone present in the room, and without wearing gloves. At the time,
8 Plaintiff JANE DOE #12 thought that these frequent digital examinations were necessary to ensure the
9 health of her baby. Plaintiff now knows that she did not need a vaginal examination during every one
10 of her pre-natal visits and that the frequency with which these examinations was performed, as well as
11 how they were performed – in an overly-lengthy manner, without a chaperone, and without gloves –
12 was done to sexually harass and abuse her and to gratify BROCK.

13 219. Several times, after a pelvic exam, BROCK would say to her "Don't worry, we are
14 going to make you like new after the baby comes – like a reborn virgin." At the time, trusting that she
15 was being provided high quality care from a skilled obstetrician, Plaintiff believed that BROCK's
16 comments were made for a medical purpose—because she was "damaged" from two prior pregnancies
17 and childbirth and that her intimate anatomy was in need of "repair." The comments made her self-
18 conscious and kept her off balance and distracted from the liberties he had just taken with her body
19 during his physical "exam." Plaintiff now knows that BROCK's comments about her intimate anatomy
20 were not appropriate, were not a part of legitimate medical care, but were made to groom, embarrass
21 and sexually harass her and to gratify BROCK.

22 220. After her delivery, BROCK was guiding a medical student to stitch up Plaintiff JANE
23 DOE#12. After the medical student apparently failed to do it properly, BROCK took over and
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1 completed her vaginal repair. Upon information and belief, BROCK did indeed alter Plaintiff JANE
2 DOE#12's intimate anatomy, apparently to make her "like a reborn virgin." Plaintiff JANE DOE #12
3 was stitched up in a manner that caused her continued pain thereafter, especially during intimacy. At
4 the time, Plaintiff continued to trust that she was being provided with high quality care by a skilled
5 obstetrician and gynecologist in a reputable hospital. She now understands the depravity of a physician
6 altering her intimate anatomy in a manner that he believed would be pleasing to her partner.
7

8 221. In late 2017, Plaintiff JANE DOE#12 became pregnant, again by means of in vitro
9 fertilization. She again went to BROCK, trusting his reputation as an expert regarding high-risk
10 pregnancies, and because he had ultimately helped her to deliver a healthy baby in 2015. She trusted
11 that BROCK was a skilled physician who would provide her with excellent pre-natal care, hopefully
12 resulting in the delivery of another healthy child. BROCK again took advantage of the trust and
13 confidence he had garnered from her previous healthy delivery to sexually abuse and harass her.
14

15 222. BROCK's pelvic exams continued, as they had in her previous pregnancy, to be too
16 long, too frequent, and followed by the same comments about her intimate anatomy. Plaintiff continued
17 to focus on her pregnancy, believing that she needed to endure BROCK's medical treatment of her in
18 order to ensure the delivery of a healthy baby.
19

20 223. Upon learning that BROCK was being sued for sexual misconduct involving patients,
21 Plaintiff JANE DOE#12 came to understand what had been done to her and that BROCK performed
22 his physical examinations of her in a non-medical manner for no other reason than his own sexual
23 gratification and to sexually harass and abuse her. She now also knows that the way that he stitched
24 her together following her delivery was not medically necessary or appropriate and not a part of
25 legitimate medical care, but was in fact sexually abusive, and was done solely to sexually gratify
26 BROCK.
27
28

1 224. Because BROCK took advantage of Plaintiff JANE DOE#12 (when she was at her most
2 vulnerable, believing that she needed his particular expertise during her high-risk pregnancies), to
3 abuse her, Plaintiff JANE DOE#12 has experienced feelings of betrayal, humiliation, depression, and
4 anxiety, which have resulted in physical manifestations of that distress including sleeplessness and lack
5 of focus.
6

7 **L. Specific Factual Allegations - JANE DOE #13**
8

9 225. In 2011, Plaintiff JANE DOE#13 was experiencing severe abdominal pain that had sent
10 her to the emergency department of Cedars looking for answers, and for pain relief, on more than one
11 occasion. After multiple emergency room visits, one of which had resulted in hospitalization, a close
12 friend of hers referred her to BROCK, stating that he was an experienced gynecologist that would be
13 able to diagnose and treat her ongoing issues. Plaintiff JANE DOE#13 made an emergency
14 appointment with BROCK's office the day after one of her emergency room visits. She continued to
15 see BROCK every 2 weeks for the next 5 months as she was trying to figure out and resolve her severe
16 pain and ongoing vaginal bleeding.
17

18 226. Because BROCK came highly recommended, and because of Cedars' standing in the
19 community, Plaintiff believed that she would be receiving expert gynecological care from BROCK
20 through the Cedars clinic on La Cienega Boulevard. BROCK garnered Plaintiff JANE DOE#13's trust
21 which he took advantage of in order to sexually abuse and harass her and to gratify himself.
22

23 227. Plaintiff JANE DOE#13 had never undergone a transvaginal ultrasound before she
24 became a patient of BROCK's. During her first transvaginal ultrasound, BROCK took lubricant and
25 applied it directly to her vaginal opening. He then began rubbing her clitoris and labia saying, "Now,
26 just relax," before inserting the wand. Having no experience with this particular test, she knew it made
27 her intensely uncomfortable but trusted that the manner in which BROCK performed this test was a
28

1 necessary and legitimate part of diagnosing and hopefully treating her severe abdominal and pelvic
2 pain.

3 228. BROCK continued to perform transvaginal ultrasounds during approximately half of
4 her visits to his office in this same manner – applying the lubricant directly to her vaginal opening and
5 rubbing her clitoris and labia prior to insertion of the wand. Plaintiff JANE DOE #13 trusted that she
6 was receiving high quality care from a skilled gynecologist, and she trusted that this must be the
7 accepted manner in which this ultrasound test was performed. Plaintiff now knows that the manner in
8 which BROCK touched and caressed her during these multiple transvaginal ultrasounds was not
9 medically acceptable, was not a part of routine medical care, but was sexually abusive, and was done
10 to sexually gratify BROCK.
11

12 229. BROCK also performed vaginal examinations, using his fingers, during every one of
13 her visits to his office. These examinations were very lengthy and always occurred while the nurse who
14 had escorted her to the exam room was out on some sort of errand for BROCK, so that there was never
15 a chaperone present. BROCK would also touch Plaintiff JANE DOE #13's clitoris and labia during
16 these digital exams. Although, at the time that she was under BROCK's care, she thought she was
17 receiving expert care from a skilled gynecologist, Plaintiff JANE DOE#13 now knows that the way
18 BROCK touched her was not a part of legitimate gynecological care, but was sexually abusive, and
19 was done solely for BROCK's own gratification.
20

21 230. BROCK also made what Plaintiff now knows to have been sexually harassing comments
22 to her during her visits to his office. For example, during her first pelvic examination with BROCK,
23 he said "Wow, these are some of the biggest ones I've ever seen!" When she asked him, "What?"
24 BROCK replied, "Your lips, Dear." Plaintiff JANE DOE #13 who was concerned about what her
25 severe pain and bleeding could mean, and whether or not she had cancer, ignored this comment, and
26
27
28

1 others at the times they were made. However, with hindsight, Plaintiff JANE DOE#13 now realizes
2 that not only was BROCK's commentary regarding her intimate anatomy highly inappropriate, it also
3 kept her unbalanced, and distracted her from the physical liberties he was taking with her during her
4 examinations.

5
6 231. After learning that BROCK was being sued for sexual misconduct involving patients,
7 Plaintiff JANE DOE#13 realized that the manner in which BROCK touched, rubbed, caressed and
8 spoke to her, all under the guise of routine gynecological examinations, was done to her for no other
9 reason than his own sexual gratification and to sexually harass and abuse her. She now knows that the
10 way he performed his vaginal examinations and transvaginal ultrasounds was not medically necessary
11 or appropriate and was not a part of legitimate medical care, but was done to harass Plaintiff JANE
12 DOE#13, to sexually abuse Plaintiff JANE DOE#13, and sexually gratify BROCK.
13

14 232. Because BROCK took advantage of Plaintiff JANE DOE#13 during this very painful
15 period in her life to abuse her, Plaintiff JANE DOE#13 has struggled to seek gynecological care,
16 ultimately putting her health at risk. Plaintiff JANE DOE #13 has also experienced feelings of betrayal,
17 humiliation, depression and anxiety which have resulted in physical manifestations of that distress
18 including sleeplessness and lack of focus as a result of the abuse she suffered at the hands of BROCK.
19

20 **M. Specific Factual Allegations - JANE DOE #14**

21 233. Plaintiff JANE DOE#14 became a patient of Dr. Barry BROCK at Cedars-Sinai Medical
22 Group when she became pregnant in 2011. At the time, she was only twenty-two years old and was
23 receiving obstetric and gynecological care for the first time. Plaintiff felt lucky to have the opportunity
24 to be treated at Cedars, as she believed that Cedars provided the best healthcare in the country.
25

26 234. During Plaintiff JANE DOE #14's first pre-natal exam and all or most pre-natal exams
27 that followed, BROCK required Plaintiff to submit to a vaginal exam. Plaintiff was experiencing a
28

1 normal, low-risk pregnancy and BROCK did not explain why he needed to perform these frequent
2 intimate exams. Because of Plaintiff's limited experience, she thought frequent vaginal exams of a
3 pregnant patient were normal and did not question BROCK's conduct.

4 235. When BROCK performed the pre-natal vaginal exams on Plaintiff JANE DOE #14, he
5 would casually and quickly put his fingers inside of her body and then move them in an "in and out"
6 motion for a prolonged period of time. Before seeing BROCK, Plaintiff had never before received a
7 pelvic/vaginal exam and therefore did not question his behavior. Moreover, Dr. BROCK did not explain
8 what he was looking for or examining. Plaintiff now realizes that Dr. BROCK was taking advantage of
9 her inexperience and trust to sexually abuse her, in the guise of performing a legitimate exam.
10

11 236. When Plaintiff JANE DOE #14 was admitted to the hospital to deliver her baby, another
12 practitioner performed the delivery and resulting episiotomy because Dr. BROCK was not available.
13 Weeks later, Plaintiff returned to BROCK's office because she was experiencing issues with the way
14 her episiotomy stitching was performed. Before examining her, BROCK said, "let's get that tightened
15 back up" and "your husband won't be complaining after this." BROCK quickly booked and performed
16 surgery to "correct" the episiotomy, with Plaintiff under anesthetic. When Plaintiff awoke from
17 anesthesia, she realized that a significant amount of her labia had been stitched closed, resulting in
18 disfigurement of her external genitalia. Since the surgery, Plaintiff JANE DOE #14 has had to live with
19 the disfigurement, which has caused her to suffer difficulties engaging in intimacy with her partner and
20 significant emotional upset. Plaintiff now believes that BROCK performed this surgery in the manner
21 that he did for his own sexual gratification as opposed to any medical necessity.
22

23 237. During Plaintiff JANE DOE #14's appointments Dr. BROCK would engage her in
24 casual conversation, as he was examining her intimate areas and she was fully exposed. On some
25 occasions, Dr. BROCK would pull the privacy sheet off Plaintiff JANE DOE #14 so she was exposed
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27
28

1 while he was examining her and make small talk while she was thus fully exposed, with her legs in
2 stirrups. Dr. BROCK would also criticize her weight gain during pregnancy and mock her appearance.
3 Plaintiff felt humiliated, but believed his comments were medically legitimate.

4 238. In or about late 2024, Plaintiff JANE DOE #14 discovered the allegations made against
5 Dr. BROCK and began to reflect on her own experiences. She then realized that the vaginal exams Dr.
6 BROCK gave her – and the manner that they were performed – were not medically necessary.
7 Moreover, she now knows that the “corrective” surgery Dr. BROCK performed on her labia was in fact
8 an act intended to mutilate her vagina for BROCK’s own sexual gratification. The realization that she
9 was subjected to egregious sexual abuse as a young woman has caused her to experience severe
10 emotional distress.
11

12
13 **N. Specific Factual Allegations - JANE DOE #15**
14

15 239. Plaintiff JANE DOE#15 was an established patient of Cedars when she became
16 pregnant with her first child in 2006. She continued to receive care from BROCK during her second
17 pregnancy in 2009. She was referred to BROCK specifically by several friends because he was known
18 as being one of the best OBGYN’s in the area.

19 240. Plaintiff JANE DOE #15’s first pregnancy was considered “high risk” and she began
20 regular pre-natal appointments with BROCK where he conducted breast exams, pelvic exams, and
21 rectal exams at nearly every appointment.
22

23 241. Plaintiff JANE DOE #15’s husband was not present for the pelvic and rectal exams
24 BROCK performed. Plaintiff JANE DOE #15 remembers BROCK using what she believes were
25 ungloved fingers when he conducted her pelvic exams. On at least one occasion while Plaintiff was
26 laying on the exam table with her feet in the stirrups, BROCK put lubricant directly on his fingers and
27
28

1 then began massaging her clitoris. Plaintiff JANE DOE #15 startled, sitting up from the table. BROCK
2 immediately stopped and proceeded to reach for the speculum to continue the examination.

3 242. During breast exams, BROCK made comments to the effect of, “Your breasts are really
4 plump and juicy right now.” He also regularly used profanity, saying “f*** this” and “f*** that.”
5

6 243. During at least one appointment when Plaintiff JANE DOE#15 was several months
7 pregnant, BROCK told her she was “fat” and needed to eat less because she had “a great body” before
8 her pregnancy and would “need to get back to that.” Plaintiff JANE DOE #15 is informed and believes,
9 and on that basis alleges that BROCK was aware of her struggles with past eating disorders. Because
10 Plaintiff JANE DOE#15 placed her trust and confidence in BROCK and believed that BROCK, in
11 particular, was trustworthy and skilled, she questioned herself about how much food she was
12 consuming and if she should eat less in response to his comments.
13

14 244. Plaintiff JANE DOE#15 believed that a licensed physician at Cedars would not be
15 involved in anything untoward and believed that BROCK was performing legitimate and medically
16 necessary examinations.
17

18 245. Plaintiff JANE DOE#15’s first pregnancy was successful, although BROCK had to
19 perform an emergency C-Section. Plaintiff continued to see BROCK for her second pregnancy in
20 2009, however as soon as she no longer required post-pregnancy care, she ceased all care with BROCK.

21 246. Only after learning that BROCK was being sued for sexual misconduct involving
22 patients, did Plaintiff JANE DOE#15 come to understand what had been done to her. Plaintiff JANE
23 DOE#15 now understands that BROCK performed his exams in a non-medical manner for no other
24 reason than his own sexual gratification and to sexually harass and abuse her. She now knows that the
25 way his breast, pelvic, and rectal exams were performed was not medically necessary or appropriate
26 and was not a part of legitimate medical care but was done to sexually gratify BROCK.
27
28

1 247. As a result of BROCK’s sexually abusive behavior, Plaintiff JANE DOE#15 has
2 suffered and continues to suffer feelings of anxiety during pelvic exams, trust issues with medical
3 professionals and specifically male medical professionals. Looking back, Plaintiff JANE DOE#15
4 questioned whether she had somehow invited BROCK to engage in the sexually abusive behavior and
5 blames herself for being vulnerable. As a result, she experiences flashbacks and intrusive thoughts,
6 insomnia, avoidance, humiliation, anger, embarrassment, self-doubt and self-blame.
7

8 **O. Specific Factual Allegation – JANE DOE #16**
9

10 248. Plaintiff JANE DOE #16 initially saw Dr. BROCK in the fall of 2018, during her first
11 trimester of her first pregnancy. Plaintiff #16 is originally from Denmark, was 25-years old, new to
12 the country, and had no prior experience with gynecological care when she became a patient
13 of BROCK’s.
14

15 249. Upon learning of her pregnancy, Plaintiff JANE DOE #16 was referred to RODEO by
16 a friend’s cousin who was a patient there (not of BROCK). After reviewing the Rodeo website, Plaintiff
17 thought, “it couldn’t get better than this,” in reference to the location of the clinic in the exclusive area
18 of Beverly Hills, and its affiliation with Cedars.
19

20 250. From the moment Plaintiff JANE DOE #16 arrived at the office, BROCK’s reputation
21 was everywhere. Each time she would check in at front desk, the staff would inquire, “Who is your
22 doctor?” and indicate that BROCK was “the best.” Plaintiff believed that she would be receiving quality
23 prenatal care from a well-respected physician in a reputable clinic.
24

25 251. BROCK performed pelvic examinations during most of Plaintiff JANE DOE #16’s
26 prenatal visits. From the beginning, BROCK was rough with Plaintiff JANE DOE#16. BROCK never
27 communicated what he was going to do next. For example, Plaintiff would be lying on the examination
28 table and without warning, BROCK would forcefully open her legs and insert his fingers to examine

1 her. This was startling and scary for Plaintiff. BROCK's use of the speculum was painful and conducted
2 in a manner that Plaintiff now recognizes was violent compared to her subsequent provider.

3 252. While these interactions were upsetting to Plaintiff JANE DOE#16, each time she
4 encountered a staff member, BROCK's reputation made her doubt herself. It was clear BROCK was
5 respected – even revered– in the office.
6

7 253. On one occasion, a female medical student accompanied BROCK during Plaintiff
8 JANE DOE #16's exam. BROCK performed a transvaginal ultrasound on Plaintiff during this visit.
9 The medical student asked BROCK why he was performing an ultrasound. Plaintiff JANE DOE #16
10 now understands and believes the transvaginal ultrasound was not medically necessary, but was
11 performed to sexually abuse her and to gratify BROCK.
12

13 254. BROCK performed a breast "exam" during many of Plaintiff JANE DOE #16's
14 prenatal visits. BROCK would leer and stare at her breasts as he held, touched and "examined" them
15 for a lengthy amount of time. Plaintiff JANE DOE #16's current gynecologist examines her breasts in
16 a quick and business-like manner, looking up and away from Plaintiff. Plaintiff is now aware that both
17 the frequency and manner in which BROCK's breast examinations were performed from 2018 through
18 2023 were not medically appropriate or necessary, and that they were done to sexually abuse her and
19 to sexually gratify BROCK.
20

21 255. During and after each exam, BROCK made inappropriate comments while she was
22 still undressed, including: "Oh you're so young," "Oh you're so perfect," (after digitally penetrating
23 her as part of her pelvic "exam"). BROCK made these comments while also engaging in what Plaintiff
24 now understands to have been non-medical touching unrelated to any exam, making eye contact or
25 staring at her undergarments and habitually placing his hand on Plaintiff JANE DOE #16's thigh.
26 BROCK also made comments about Plaintiff JANE DOE #16's appearance saying that he "hoped her
27
28

1 baby inherited her good looks rather than her husband's." Plaintiff JANE DOE #16 now realizes that
2 BROCK's comments were not medically appropriate but were in fact sexually abusive and harassing.

3 256. In 2019, Plaintiff JANE DOE #16 gave birth to her daughter at Cedars. Plaintiff JANE
4 DOE #16's daughter was delivered by another Cedars' physician, as BROCK was unavailable at the
5 time of birth.
6

7 257. When Plaintiff JANE DOE #16 became pregnant with her second child in 2020, she
8 remained under BROCK's medical care for the duration of the pregnancy. Consistent with her first
9 pregnancy, Plaintiff JANE DOE #16's prenatal examinations were (Plaintiff now realizes) frequent,
10 prolonged, and intimate.
11

12 258. Plaintiff JANE DOE #16 was extremely uncomfortable yet, every time she looked to a
13 nurse or someone to gauge whether BROCK's conduct was in any way inappropriate, she was met with
14 a barrage of "Dr. Brock is the best," commentary. This caused her to doubt herself. Many times,
15 Plaintiff cried after her visits with him, but she questioned her reactions and believed that she was
16 overreacting to normal medical examinations.
17

18 259. On one occasion, while BROCK's fingers were inside Plaintiff JANE DOE #16's
19 vagina for an exam, BROCK started leaning his full body over her, standing between her legs to the
20 point of almost making full body contact with the lower half of her body. Plaintiff tried closing her legs
21 in resistance to him pressing against her between her legs, but BROCK forcefully thrust her legs back
22 open --continuing to lay most of his body weight on top of her while digitally penetrating her, under
23 the guise of a medical "examination."
24

25 260. After this encounter, as soon as Plaintiff JANE DOE #16 reached her car, she broke
26 down crying, but doubted herself thinking, "What is wrong with me? This is a doctor's
27 exam." Plaintiff now knows that the way in which BROCK forced her legs apart leaned and over her
28

1 while digitally penetrating her was not medically appropriate but was done to intimidate her, to sexually
2 abuse her and to sexually gratify BROCK.

3 261. Plaintiff JANE DOE #16's second birth was traumatic. Plaintiff had a rare liver
4 condition that threatened both her life and that of her baby. As contractions progressed and it was time
5 for delivery, BROCK took an extremely long time to get to the hospital causing unbearable anxiety
6 under life threatening circumstances.

8 262. When BROCK finally arrived, he was completely disheveled and did not acknowledge
9 or communicate with Plaintiff JANE DOE #16 or her husband as he entered the room to deliver their
10 baby. Instead, BROCK walked in, walked straight across the room into the restroom, left the door open,
11 lowered his pants exposing intimate parts of himself, and urinated openly. Plaintiff was shocked yet
12 had to focus on delivering her baby.

14 263. Consistent with the manner in which he conducted his prenatal exams, BROCK did not
15 communicate with Plaintiff JANE DOE #16 and was physically rough with her during this birth.
16 Without warning, BROCK grabbed Plaintiff's legs and crammed them into a set of straps up high.
17 JANE DOE # 16 was shocked by this because the physician who had delivered her first baby had asked
18 Plaintiff what position was most comfortable, and she had not previously had her legs strapped in this
19 manner.
20

21 264. During the entire birthing process and immediately after delivery, BROCK appeared
22 not to care about Plaintiff's wellbeing, including when he aggressively stitched her up and crudely
23 remarked to her husband, "I'm gonna make it tight, and make it look good down there for you."

25 265. Following the birth, Plaintiff JANE DOE #16 saw BROCK at Cedars' location on
26 Roberston Boulevard. Because Plaintiff JANE DOE #16's second birth had complications, she
27 required frequent post-partum visits with BROCK for follow-up care. Plaintiff experienced heightened
28

1 anxiety with each visit. Ultimately, in 2023, Plaintiff JANE DOE #16 began searching for a female
2 OBGYN.

3 266. It was during her first appointment with this female OBGYN that Plaintiff JANE DOE
4 #16 began to question whether BROCK's conduct was not medical in nature. When Plaintiff JANE
5 DOE #16 learned that BROCK was being sued for sexual misconduct with patients, she came to more
6 fully understand that BROCK's "exams" were performed in a manner that was sexually abusive to her
7 and sexually gratifying to him.

8
9 267. Plaintiff JANE DOE #16 had been unable to have sex with her husband for a long time
10 – even seeking pelvic floor therapy to address the issue. Plaintiff blamed herself for her post-natal
11 sexual dysfunction thinking that something was wrong with her physically. Finally, after learning that
12 BROCK was being sued for sexual misconduct with patients, Plaintiff JANE DOE #16 started
13 connecting the psychological injuries she's suffered to the sexual abuse that that BROCK perpetrated
14 against her.

15
16 268. BROCK's medically unnecessary exams and procedures, and the repeated
17 psychological and sexual abuse of Plaintiff JANE DOE #16 has profoundly impacted Plaintiff. Plaintiff
18 suffers from extreme manifestations of post-traumatic stress, including, but not limited to, painful sex.
19 sexual avoidance and dysfunction, difficulty sleeping, nightmares, increased anxiety, depression, UTIs
20 (which Plaintiff never had prior to being a patient of BROCK), fear of male doctors, and medical
21 avoidance. As an example, Plaintiff JANE DOE #16 refuses to undergo a medically necessary
22 colonoscopy to address ongoing severe gastric issues for fear of any physician having access to her
23 lower body.
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1 **P. Specific Factual Allegations - JANE DOE #17**

2

3 269. Plaintiff JANE DOE#17 is a long-time patient of Cedars with a history of serious

4 fibroids and multiple medical conditions requiring specialized care. For most of her adult life, Plaintiff

5 JANE DOE #17 was extremely fond of Cedars because she consistently received top-tier medical

6 treatment. PLAINTIFF JANE DOE #17 had even volunteered in Cedars' newly created Sapperstein

7 Critical Care Unit as Critical Care Concierge in 2006. The name Cedars, and its medically renowned

8 presence, surrounds the Los Angeles area where Plaintiff lives. Plaintiff JANE DOE#17 relied on

9 Cedars – its reputation, medical prestige, and delivery of medically necessary and appropriate care over

10 the years.

11

12 270. As a child, Plaintiff JANE DOE#17 suffered sexual abuse and spent time in the foster

13 care system.

14

15 271. In 2015, Plaintiff required a second myomectomy surgery, which was performed at

16 Cedars, to remove fibroids from her uterus. Plaintiff JANE DOE #17's surgery, and her gynecological

17 care to that point had been provided by a female gynecologist at Cedars. When Plaintiff JANE DOE

18 #17 called to make an appointment for her post-operative visit in 2016, and to determine whether she

19 might have a hernia in that same region, she was informed that her regular gynecologist had been

20 promoted, or was away on a fellowship, and was not available to see her. Plaintiff JANE DOE #17's

21 insurance care coordinator then scheduled her for follow up with BROCK. BROCK's office called

22 Plaintiff JANE DOE #17 to schedule this post-surgical follow up with her to see BROCK.

23

24 272. Plaintiff JANE DOE#17 placed her trust and confidence in BROCK, believing that the

25 healthcare providers at Cedars were trustworthy and skilled. BROCK garnered Plaintiff JANE

26 DOE#17's trust and confidence, in large part through the good will established by his partner at Cedars,

27 which he then took advantage of in order to sexually abuse and harass her.

28

1 273. On July 26, 2016, Plaintiff JANE DOE#17 saw BROCK at the Cedars Sinai Hospital
2 for this post operative follow up, and not at the offices where she had previously received her
3 gynecological care. There were two female interns or nurses present with BROCK as he conducted
4 this “examination.”
5

6 274. When she was draped in her privacy gown and lap cloth on the examination table,
7 BROCK performed what Plaintiff JANE DOE#17 thought at the time was a “very thorough” breast
8 exam. As BROCK “examined” Plaintiff JANE DOE #17’s breasts with both of his hands, for a lengthy
9 amount of time, he started making comments about what a “nice body” she had. At the time, BROCK’s
10 running commentary distracted Plaintiff JANE DOE#17 from the liberties he was taking with her body
11 during this lengthy “exam.” Plaintiff JANE DOE #17 now knows that there was no need for BROCK
12 to perform a breast examination during this post-operative visit regarding her myomectomy surgery
13 and to determine whether she was suffering from a hernia at or near the operative site. Plaintiff JANE
14 DOE #17 was an established patient at Cedars, she had regular breast exams in her file, and she was
15 not seeing BROCK for an annual gynecological exam. She was seeing him for post-operative care,
16 and to rule out and/or address surgical complications. Plaintiff JANE DOE #17 now understands that
17 BROCK’s gratuitous breast exam was not medically necessary and was performed in a non-medical
18 manner, solely for BROCK’s own sexual gratification.
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21 275. A virgin at the age of 43, Plaintiff JANE DOE # 17, had always required the smallest
22 speculum possible for her gynecological exams. During her pelvic exam, BROCK, knowing her sexual
23 status, first inserted the speculum and swabbed her uterus. After the speculum portion of the pelvic
24 exam, BROCK moved to engage in a bi-manual examination of her uterus and abdomen. As he inserted
25 his fingers and lifted her privacy gown to expose her abdomen he again began commenting about her
26 body. BROCK commented on her “very fit, six pack abs.” And while his fingers were inside of her,
27
28

1 BROCK began asking her questions and making comments such as, “Are you single? “You are very
2 attractive,” “You have such a nice body.” These remarks made Plaintiff extremely uncomfortable.
3 Moreover, Plaintiff JANE DOE #17 now knows that the bi-manual exam performed by BROCK was
4 overly lengthy, and performed in a non-medically necessary manner, and that in addition to being
5 sexually harassing and abusive, BROCK’s ongoing commentary was meant to distract her from the
6 liberties he was again taking with her body.
7

8 276. During and after BROCK’s constant commentary about her body, Plaintiff JANE
9 DOE#17 looked over at the nurses to see if they were reacting to BROCK’s behavior as she was, but
10 they looked away as though nothing out of the ordinary was occurring.
11

12 277. After the “exam” was done and BROCK left the room, Plaintiff JANE DOE #17 must
13 have appeared visibly shaken because both of the nurses spontaneously offered, as if to preemptively
14 dismiss her complaints, that BROCK’s actions were perfectly acceptable - “This is normal for him,”
15 and “He doesn’t mean anything by it; He behaves this way with all of his patients - it’s just his
16 demeanor.” The response of the medical professionals who had witnessed her examination made
17 Plaintiff JANE DOE #17 doubt herself and her reaction to this examination.
18

19 278. Nonetheless, and even while doubting her own reaction, after this encounter Plaintiff
20 JANE DOE#17 sought her further follow up and ongoing medical care from another provider.

21 279. Plaintiff JANE DOE #17 now knows that she did not overreact to her examination by
22 BROCK, that his examinations of her were not “normal” nor were they medically appropriate or
23 necessary, but that they were sexually assaulting and harassing to her and sexually gratifying to
24 BROCK.
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1 280. As a result of BROCK's sexually motivated abuse and harassment of Plaintiff JANE
2 DOE #17, she suffered and continues to suffer from manifestations of post-traumatic stress including
3 but not limited to, anxiety and mistrust of male doctors and any procedures that involve disrobing.
4

5 **Q. Specific Factual Allegations - JANE DOE #18**
6

7 281. In 2021, Plaintiff saw BROCK for a total of three times at RODEO.
8

9 282. During Plaintiff JANE DOE #18's first gynecological appointment, she was being seen
10 for her six-week prenatal visit.
11

12 283. Upon arrival, Plaintiff was escorted to an examination room and told by the nurse to
13 remove her top. The nurse did not provide her with any privacy sheet or gown to cover up the top half
14 of her body, leaving Plaintiff JANE DOE #18's breasts exposed before, during, and after the entire
15 duration of the prenatal examination.
16

17 284. BROCK performed a vaginal exam and a breast exam while Plaintiff's breasts were
18 uncovered and exposed.
19

20 285. During Plaintiff JANE DOE #18's second appointment with BROCK, she learned that
21 the baby no longer had a heartbeat. Plaintiff had lost two previous pregnancies to miscarriage but this
22 was the first one requiring a DNC. Devastated, Plaintiff was told to come back for a DNC later that
23 day by, and with, BROCK.
24

25 286. Later that day, Plaintiff JANE DOE #18's returned for her appointment with BROCK
26 for the DNC. BROCK injected the medication for anesthesia and without waiting for it to take effect,
27 began the DNC process. Plaintiff was screaming in agonizing pain and BROCK didn't flinch. While
28 there was one nurse in the room assisting him with the procedure, BROCK was forced to call a second
nurse in the room to help Plaintiff with the pain. The nurses told Plaintiff to squeeze their hands because
it was so bad. Only after the DNC was over did she begin to feel any pain relief. BROCK's violent

1 DNC was excruciatingly painful (a fact that Plaintiff now believes BROCK knew and intended)—
2 exacerbating the emotional impact surrounding the loss of her baby.

3 287. After the DNC, Plaintiff JANE DOE #18 never returned to BROCK.

4 288. As a result of BROCK's sadistic conduct, Plaintiff JANE DOE #18 has suffered, and
5 continues to suffer from physical and emotional distress including, but not limited to, physical
6 manifestations of post-traumatic stress, insomnia, sleep disturbances, anxiety, and depression.
7

8 **R. Specific Factual Allegations - JANE DOE #19**

9
10 289. Plaintiff JANE DOE#19 was a patient of BROCK from approximately 2023 to 2024 at
11 BEVERLY HILLS OBGYN. She began seeing BROCK when she was experiencing pelvic pain
12 because she understood he was an experienced gynecologic specialist. Plaintiff understood BROCK
13 to be a professional and skilled physician and believed he would provide her with expert care.
14

15 290. When Plaintiff JANE DOE #19 first met with BROCK, she was 73 years old and had
16 undergone a hysterectomy in prior years. She told him she would prefer not to go through a pelvic
17 exam, given her age and anatomy, and asked if he could provide her with advice on how to alleviate
18 her pelvic pain. BROCK told her that regardless of her circumstances, he would still need to conduct
19 a full vaginal and pelvic exam.
20

21 291. BROCK conducted a vaginal exam that seemed to last a prolonged period of time and
22 involved BROCK moving his fingers inside Plaintiff JANE DOE #19's body in a manner that Plaintiff
23 now realizes was intended to sexually stimulate her. Despite the fact that Plaintiff submitted to
24 BROCK's required exams, BROCK was not able to help Plaintiff alleviate her pelvic pain.
25

26 292. During at least one of her appointments, BROCK conducted a breast exam that involved
27 groping, squeezing, and cupping Plaintiff JANE DOE #19's breasts for longer than a minute. Before
28 the exam, BROCK required Plaintiff to remove her privacy covering and to remain exposed throughout

1 the exam. Looking back, Plaintiff JANE DOE #19 realizes that BROCK required her to remain naked
2 and on display to humiliate her and conducted the exam in a sexual manner, for his own gratification.

3 293. Soon after Plaintiff JANE DOE's last appointment with BROCK, she discovered that
4 his conduct was grossly inappropriate and sexual in nature. As a result of her realization, she has
5 experienced severe emotional distress and upset.
6

7 **S. Specific Factual Allegations - JANE DOE #20**

8

9 294. In 2014, Plaintiff JANE DOE #20 became pregnant for the third time. Her first two
10 pregnancies had resulted in one live birth and one spontaneous termination, so when she became
11 pregnant this third time, with the hope of carrying this baby to term, and delivering a healthy baby, she
12 sought her prenatal care from BROCK in the Cedars Medical Center on Third Street. Plaintiff JANE
13 DOE#20 chose BROCK because he was associated with Cedars. She understood that the doctors at
14 Cedars would provide her with the very best in prenatal care as well as care through what she hoped
15 would be her labor and delivery. Plaintiff placed her trust and confidence in BROCK believing that
16 the healthcare providers at Cedars, and BROCK, in particular, were trustworthy and skilled.
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18 295. Plaintiff JANE DOE #20's husband attended every one of her pre-natal visits during her
19 2014-2015 pregnancy. BROCK garnered Plaintiff JANE DOE#20's trust and confidence which he then
20 took advantage of in order to sexually abuse and harass her.
21

22 296. Following her delivery, BROCK said something to her husband, while he was stitching
23 her up to the effect that he would make her "very tight" for him. At the time, Plaintiff continued to
24 trust that she was being provided with high quality care by a skilled obstetrician and gynecologist in a
25 reputable hospital. She now understands the depravity of a physician altering her intimate anatomy in
26 a manner that he believed would be pleasing to her partner.
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1 297. In 2017, Plaintiff JANE DOE#20 again became pregnant and went to see BROCK for
2 pre-natal care. Sadly, Plaintiff did not carry this fourth pregnancy to term. However, during her 2017-
3 2018 pregnancy, she trusted BROCK and Cedars, who had ultimately helped her deliver a healthy baby
4 in 2015, to provide her with high quality care. BROCK took advantage of the trust and confidence he
5 had garnered from her previous healthy delivery to sexually abuse and harass her.
6

7 298. Plaintiff JANE DOE #20's husband was unable to attend her prenatal visits with her in
8 2017-2018. Plaintiff was alone with BROCK. BROCK performed a lengthy vaginal exam during
9 every, or nearly every one of Plaintiff JANE DOE #20's prenatal visits. At the time, Plaintiff JANE
10 DOE#20 knew that his exams were different from the female physician who delivered her first baby,
11 but she believed that BROCK must have a different style, and that she needed his specialized care to
12 deliver a healthy child. BROCK also made comments to Plaintiff JANE DOE #20 that, with the benefit
13 of hindsight, she now knows were inappropriately "flirty."
14

15 299. Upon learning that BROCK was being sued for sexual misconduct involving patients,
16 Plaintiff JANE DOE#20 came to understand what had been done to her. Plaintiff JANE DOE#20 is not
17 a native English speaker. While she speaks and understands English very well, describing her
18 interactions with BROCK remains challenging. Plaintiff JANE DOE#20 does now understand that
19 BROCK performed his physical examinations of her in a non-medical manner for no other reason than
20 his own sexual gratification and to sexually harass and abuse her. She now also knows that the way
21 that he stitched her together following her delivery was not medically necessary or appropriate and not
22 a part of legitimate medical care but was in fact sexually abusive to Plaintiff JANE DOE#20 and
23 sexually gratifying to BROCK.
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26 300. Because BROCK took advantage of Plaintiff JANE DOE#20 after her delivery, and
27 during her subsequent pregnancy when she was at her most vulnerable, to abuse her, Plaintiff JANE
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DOE#20 has experienced feelings of betrayal, humiliation, depression, and anxiety, which have resulted in physical manifestations of that distress including sleeplessness and lack of focus.

T. Specific Factual Allegations - JANE DOE #21

301. Plaintiff JANE DOE #21 sought medical care from CEDARS-SINAI by virtue of Plaintiff's desire to seek a second opinion after being diagnosed with endometriosis by a gynecologist at USC.

302. Plaintiff JANE DOE #21's adult daughter was under the care of a gynecologist at the BEVERLY HILLS OBGYN location on Robertson. Her daughter encouraged Plaintiff to contact their office and obtain a second opinion from one of the doctors there.

303. Plaintiff JANE DOE #21 contacted their office, explaining that she wanted a second opinion, and that she would be paying cash because her insurance would likely decline coverage due to the nature of the appointment. Plaintiff was advised that BROCK was far less expensive for a cash-only appointment than the other providers. Plaintiff therefore scheduled an appointment with BROCK.

304. On February 8, 2023, Plaintiff JANE DOE #21 checked in with the receptionist for her appointment with BROCK and the two got to talking. Plaintiff shared that she was a former medical assistant and missed the work. The receptionist told Plaintiff that "no one at the office liked BROCK" because he was "so mean" and not even his three grown children "wanted anything to do with him."

305. After the nurse escorted Plaintiff JANE DOE #21 to the exam room, the nurse explained that BROCK preferred to do his exams alone but if Plaintiff felt uncomfortable, she could call for a nurse and one would come in. Plaintiff was asked to fully undress and put on a gown.

1 306. Upon entering the room, BROCK told Plaintiff JANE DOE #21 that he looked at her
2 transvaginal ultrasound and said, "I'm almost 100% certain that you do not have endometriosis, but I
3 will do a Pap smear and vaginal exam to be sure."

4 307. BROCK started with a Pap smear, taking swabs. Next, he applied lubricant to his
5 fingers, inserting them into her vaginal opening and began moving them around and feeling around her
6 abdomen with his other hand.

7 308. During BROCK's examination, Plaintiff JANE DOE #21 mentioned that she desired a
8 tummy tuck to which he replied, "You would have to lose a lot of weight first." She said, "Excuse me?"
9 and BROCK said something to the effect of, "you would have to lose some weight at least."

10 309. Next, BROCK moved to the side of the exam table (in what Plaintiff assumed was going
11 to be a breast exam). BROCK proceeded to grab, grope, cup, and jiggle her entire breast one after the
12 other. Afterward, BROCK stepped away and said to Plaintiff JANE DOE #21 with a smile, "I don't
13 feel anything."

14 310. Throughout the examination, BROCK was chatty, inquiring about her history working
15 with medical professionals and such. BROCK divulged that the office wanted him to retire and leave
16 the practice.

17 311. As a result of BROCK's inappropriate misconduct, Plaintiff JANE DOE #21 suffered
18 and continues to suffer from embarrassment, humiliation, and other manifestations of emotional
19 distress.

20 **U. Specific Factual Allegations - JANE DOE #22**

21 312. Plaintiff JANE DOE #22 received gynecological care from BROCK at Cedars-Sinai
22 Medical Group, from in or about 2002 to 2011. Plaintiff was initially seen by another gynecologist in
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1 the practice, but when that physician was promoted, Plaintiff began seeing BROCK at least once a year,
2 including for all of her annual gynecological exams.

3 313. During virtually every appointment, BROCK would begin Plaintiff JANE DOE #22's
4 breast exams by rubbing his hands together, seemingly to create friction. BROCK did not wear gloves
5 and Plaintiff believed he was rubbing his hands to warm them before "examining" her breasts and
6 nipples. During each exam, he would touch her nipples with his bare fingers and ask her questions,
7 such as, "[D]oes this feel okay?" or "[I]s this good?" At the time, Plaintiff believed he was concerned
8 for her well-being, but now knows that he was sexually assaulting her, for his own sexual gratification.
9

10 314. BROCK performed a pelvic exam during almost every, if not every, appointment that
11 involved moving his bare, ungloved fingers inside her vagina in an "in and out" motion. While doing
12 so, he patted her inner thigh, near her groin, as though he was reassuring her that she would be okay.
13 BROCK also alarmed Plaintiff JANE DOE #22 by telling her that she had a "curved" cervix and that
14 this could cause intercourse to be painful. Although Plaintiff knew that these exams were more
15 prolonged and felt different than other gynecological exams that she had had, Plaintiff was concerned
16 about her health and believed that BROCK was touching her in this manner in order to thoroughly
17 examine her. She now realizes that this conduct was non-medical and was, in fact, sexual in nature.
18

19 315. BROCK also frequently gave Plaintiff JANE DOE#22 transvaginal ultrasounds during
20 which he would apply lubricant directly to her vaginal opening, using his fingers, touching and rubbing
21 her vaginal area. Instead of inserting the wand and performing the exam in a medically appropriate
22 manner, BROCK would move the transducer wand in and out of her vagina several times in a manner
23 that simulated sexual intercourse. Plaintiff did not know how such ultrasound exams were properly
24 performed; she trusted Dr. BROCK and believed he was conducting a thorough and appropriate exam.
25 She now realizes he was touching her in a non-medical way for his own sexual gratification and
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1 performing the transvaginal ultrasound in a manner designed to sexually stimulate Plaintiff and
2 sexually gratify himself.

3 316. In addition, BROCK required Plaintiff JANE DOE #22 to submit to a rectal exam at the
4 end of every appointment. Following the pelvic/vaginal exam, he would instruct her to move further
5 down on the table, rub lubricant on the outside of her rectum, and insert his ungloved fingers into her
6 rectum. Afterward, he would say, “That wasn’t so bad.” For many years, Plaintiff underwent the exams
7 without complaint. Having moved from a foreign country (and having only had most of her exams
8 outside the U.S.), Plaintiff believed that frequent rectal exams were protocol in the U.S. However, she
9 was so distressed during these invasive, painful and humiliating “exams” that she often placed the
10 pillow from the exam table over her face in order to be shielded from view while BROCK performed
11 them. Plaintiff grew to dread the rectal portion of the exams and requested that BROCK stop
12 performing them. When she did so, BROCK did not try to convince her otherwise or explain why they
13 had been important for her care. Plaintiff now realizes the rectal exams were unnecessary, as she had
14 not experienced rectal abnormalities and was healthy, and that the exams were not performed in a
15 medically appropriate way.
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19 317. Throughout her lengthy exams, BROCK would likewise make comments that Plaintiff
20 now understands were sexually harassing and inappropriate. Following pelvic exams, he would often
21 say, “Your husband is so lucky.” He also asked her whether her husband was “good looking” and
22 whether sex with her husband was pleasurable. At the time, Plaintiff JANE DOE #22 believed that
23 BROCK had a casual style of interacting with patients and that he was providing her with appropriate
24 medical care.
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1 318. During most of Plaintiff JANE DOE #22's appointments with BROCK, during the
2 entirety of her physical exams both vaginal and rectal, BROCK did not wear gloves and touched her
3 intimate areas with his bare fingers.

4 319. Eventually, in or about 2011, Plaintiff JANE DOE #22 told her husband that she was
5 experiencing tremendous stress whenever she had an appointment with BROCK and that she wanted
6 to stop seeing him. After this, Plaintiff began to seek care with another gynecologist. Plaintiff always
7 thought of herself as very strong and not someone who was easily made uncomfortable. As a result,
8 she questioned and blamed herself for feeling any discomfort during appointments with BROCK,
9 continuing to believe that he had a different style of performing exams, was more "thorough," and that
10 pelvic and rectal exams were performed differently in the U.S. than in Plaintiff's native country.

11 320. In or about late 2024, when Plaintiff JANE DOE #22 became aware of the allegations
12 made against BROCK for sexual misconduct, she reflected on her experiences and realized that
13 BROCK took advantage of his status as her gynecologist to sexually abuse her during exams. As a
14 result of that realization, Plaintiff has experienced severe anxiety, stress, flashbacks, and other
15 symptoms related to post-traumatic stress disorder.

16 **V. Specific Factual Allegations - JANE DOE #23**

17 321. Plaintiff JANE DOE#23 became a patient of Dr. Barry BROCK at RODEO in or about
18 2019, when she was pregnant with twins. Plaintiff sought care at Rodeo because it was advertised to
19 be an elite, professional facility specializing in high-risk pregnancies. Given she was having multiple
20 babies, Plaintiff wanted to ensure that she had access to experienced obstetricians. Plaintiff trusted
21 BROCK and believed him to be one of the best obstetricians in the country.

22 322. At Plaintiff JANE DOE #23's initial appointment with BROCK, BROCK instructed
23 her to remove all of her clothing because she would need to undergo a vaginal and breast exam. Plaintiff
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1 was up to date on her gynecological care and had recently received a Pap smear and a breast exam, but
2 she complied with BROCK's instructions. During the breast exam, BROCK touched, fondled, and
3 squeezed Plaintiff's nipples. While squeezing her nipples, BROCK said he was checking for discharge
4 and acted as though his behavior was customary and routine. Plaintiff now realizes that his behavior
5 lacked medical legitimacy.
6

7 323. During the same appointment, BROCK performed a prolonged vaginal exam on
8 Plaintiff JANE DOE #23 and made what she now realizes was a highly inappropriate and cruel
9 comment. While peering down at her vagina, he said, "I can see this isn't your first pregnancy. They
10 should fall right out even if they are breach." Plaintiff understood his comment to mean that her vagina
11 was irreparably stretched out from the three children she had had prior to becoming pregnant with her
12 twins.
13

14 324. Throughout Plaintiff JANE DOE #23's pre-natal care, BROCK gave Plaintiff multiple
15 other vaginal exams that seemed to last several moments. While conducting the vaginal exams, he
16 would stare deeply into Plaintiff's eyes in a manner that Plaintiff now realizes was inappropriately
17 intimate and sexually motivated.
18

19 325. BROCK delivered Plaintiff JANE DOE #23's babies at Cedars-Sinai Medical Center.
20 While Plaintiff was laboring, BROCK told her that if she "tore" while she was pushing, or if he needed
21 to perform an episiotomy, he would be sure to "suture [her] well" so that her husband would not notice
22 a difference during intercourse. Plaintiff now realizes that BROCK's comment was highly
23 inappropriate and made for purely sexual reasons. Indeed, neither Plaintiff, nor her husband, had
24 expressed concerns to BROCK about her husband's future sexual satisfaction.
25

26 326. Plaintiff JANE DOE #23 was able to deliver her twins naturally; however, during the
27 process she lost so much blood that she started hemorrhaging and lost consciousness. Looking back,
28

1 Plaintiff feels terrified at the thought of BROCK administering intimate “medical care” while she was
2 unconscious and unable to protect herself – especially care that was sexually motivated.

3 327. Following the delivery, Plaintiff JANE DOE #23 saw BROCK at Rodeo for post-natal
4 care. During at least one post-natal appointment, BROCK inserted multiple fingers inside Plaintiff’s
5 rectum, without warning, to give her an apparent rectal exam. At the time, Plaintiff again believed he
6 was just being thorough and ignored her discomfort. She now realizes the rectal “exam” was
7 unnecessary was performed in a non-medical manner and was done for BROCK’s sexual gratification.
8

9 328. Prior to Plaintiff JANE DOE #23’s first appointment with BROCK, Plaintiff had
10 received pre-natal care from former OB/GYN James Heaps, while she was pregnant with her third
11 child. Heaps was forced to leave UCLA in 2018 due to accusations of sexual misconduct (which later
12 led to multiple criminal convictions). It wasn’t until after Heaps was arrested that Plaintiff discovered
13 that Heaps sexually assaulted her during her exam.
14

15 329. After Plaintiff JANE DOE #23’s experiences with Heaps, she did not want to see
16 another male doctor, however, she told herself that she needed to ignore her misgivings out of
17 consideration for the safety of her babies. Plaintiff believed that the incidents involving Heaps were
18 highly unusual and did not fathom she would be abused again.
19

20 330. Plaintiff JANE DOE #23 now realizes that BROCK’s conduct was perpetrated for
21 BROCK’s own sexual gratification, rather than a legitimate medical need. As a result of that realization,
22 Plaintiff has had to deal with tremendous upset and anxiety. This distress is compounded by the fact
23 that she suffered abuse perpetuated by BROCK when she was still recovering from the aftermath of
24 being abused by Heaps. Plaintiff will now never again see or trust another male gynecologist.
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1 **W. Specific Factual Allegations – JANE DOE #24**

2 331. Plaintiff JANE DOE #24 was a minor at the time of her initial sexual abuse as described
3 herein (she is currently 35 years old), referred to BROCK by her mother at age 17. When she first saw
4 BROCK, Plaintiff had never seen a gynecologist before.

5
6 332. Between 2007 to 2010 or 2011, Plaintiff sought gynecological care from BROCK
7 while pregnant with her first child. Plaintiff's prenatal appointments were primarily with BROCK at
8 the Cedars Sinai Tower location.

9 333. BROCK performed a pelvic exam on Plaintiff on approximately half of her visits
10 throughout her first pregnancy. During these pelvic exams, BROCK's thumb or middle finger was
11 always resting near her clitoris and his digital vaginal exams were very lengthy (by comparison to the
12 numerous other exams she has had since her three children were born).

13
14 334. During three different pelvic exams, BROCK made comments in front of Plaintiff
15 JANE DOE #24's mother and boyfriend – who attended her visits because she was a minor.

16 335. On at least one occasion, during BROCK's vaginal exam, BROCK said, "Oh, now I
17 see why you're pregnant; you have a beautiful labia," and, "You are real nice and tight and warm." Her
18 boyfriend and she exchanged looks silently implying, "Did we hear him correctly?" But, as both of
19 them were very young, they doubted themselves and continued to trust that BROCK, a seasoned
20 physician in a reputable practice, was trustworthy, skilled and providing Plaintiff JANE DOE #24 with
21 appropriate pre-natal care.

22
23 336. When Plaintiff became pregnant with her second baby in 2010, she saw BROCK two
24 or three times. During one visit, BROCK said, while conducting his pelvic exam, "I remember you.
25 You have the nice labia." Her boyfriend told BROCK, "Hey, you can't be saying things like that." But
26 again, Plaintiff JANE DOE #24 believed that her boyfriend had overreacted, and that Cedars would
27
28

1 not employ and promote a physician who would make comments that were inappropriate or sexual in
2 nature.

3 337. BROCK's pelvic exams performed on Plaintiff were lengthy, and with the benefit of
4 hindsight, didn't feel clinical.

5 338. Only after learning that BROCK was being sued for sexual misconduct involving
6 patients, did Plaintiff JANE DOE #24 come to understand what had been done to her. Plaintiff JANE
7 DOE #24 now understands that BROCK repeatedly performed exams in a non-medical manner for no
8 other reason than his own sexual gratification and to sexually harass and abuse her. She now knows
9 that the way his pelvic exams were performed, and the comments he made to her, were not medically
10 necessary or appropriate and were not a part of legitimate medical care but were done in a manner to
11 physically intimidate Plaintiff JANE DOE #24, to sexually abuse Plaintiff JANE DOE #24, and
12 sexually gratify BROCK.
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15 339. Because BROCK took advantage of Plaintiff JANE DOE #24 during these vulnerable
16 examinations to sexually abuse and harass her, Plaintiff JANE DOE #24 has experienced feelings of
17 betrayal, humiliation, depression, anxiety, intrusive thoughts and other symptoms of PTSD which have
18 resulted in physical manifestations of that distress including sleeplessness and lack of focus.
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20 **X. Specific Factual Allegations - JANE DOE #25**
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22 340. Plaintiff JANE DOE#25 saw Dr. Barry BROCK from in or about late 2019 to in or about
23 2020 for pre-natal care at RODEO. BROCK ultimately delivered Plaintiff's baby at Cedars-Sinai
24 Medical Center on October 6, 2020.
25

26 341. Plaintiff JANE DOE #25 was a patient of BROCK's throughout the peak of the COVID
27 pandemic. Plaintiff was already deemed to have a high-risk pregnancy, due to her advanced maternal
28

1 age and risk of developing pre-eclampsia. These high-risk factors – in combination with her fear of
2 what contracting COVID could do to her baby, made Plaintiff feel anxious and worried. Plaintiff JANE
3 DOE #25 constantly feared for the health and the safety of her unborn child. To make things worse,
4 Rodeo would not allow her to bring her partner with her to her appointments for support and therefore
5 she had no choice but to attend appointments alone.
6

7 342. Throughout Plaintiff JANE DOE #25's pregnancy, BROCK administered multiple
8 breast and vaginal examinations, using bare, ungloved fingers. The vaginal exams involved BROCK
9 inserting his bare fingers inside Plaintiff's vagina in a manner that Plaintiff now realizes was not
10 medically legitimate. Plaintiff now realizes that the vaginal and breast exams were not necessary pre-
11 natal care – and that the way they were conducted was not medically legitimate.
12

13 343. The day Plaintiff JANE DOE #25 delivered her baby, BROCK made comments to
14 Plaintiff that she now realizes were highly inappropriate. When BROCK checked Plaintiff's cervix for
15 dilation, he instructed her to spread her legs and said, "Now this is the position that got you here."
16 Looking back, Plaintiff realizes that BROCK was speaking of and envisioning her having sexual
17 intercourse, while inserting his fingers in her vagina.
18

19 344. At the time, Plaintiff JANE DOE #25 trusted BROCK and believed he was a highly
20 skilled physician. She did not have any reason to question his techniques.
21

22 345. Moreover, no chaperone was ever present during his exams to ensure that BROCK was
23 acting appropriately, nor was her partner allowed to be present.
24

25 346. In or about late 2024, Plaintiff JANE DOE #25 realized that BROCK's behavior was
26 not medically legitimate and that he took advantage of her vulnerability to sexually assault her. As a
27 result of the realization that DEFENDANTS allowed BROCK to sexually abuse her multiple times
28

1 throughout her pregnancy, she feels betrayed and humiliated. As a result, she no longer trusts men or
2 male doctors and cannot bring herself to get the medical treatment that she needs.

3 **Y. Specific Factual Allegations - JANE DOE #26**

4 347. In 2010, Plaintiff JANE DOE#26, was a Senior research scientist with a contract
5 research organization, working on a study at Cedars, when, at approximately 40 years old, she became
6 pregnant with her first child. Her 'advanced maternal age' made her pregnancy 'high-risk.' Plaintiff
7 JANE DOE#26 chose to see an obstetrician affiliated with the Cedars-Sinai Medical Center because of
8 the hospital's reputation in the community as a quality medical center. She was also told by her co-
9 workers at Cedars that BROCK was an experienced and highly skilled obstetrician.
10

11 348. Plaintiff JANE DOE#26 placed her trust and confidence in BROCK and Cedars, which
12 held BROCK out to the community as skilled, qualified, safe and trustworthy. At no time did any
13 person from BROCK's office or from Cedars provide any information or warning to Plaintiff JANE
14 DOE# 26 regarding BROCK's prior sexual misconduct, prior sexual harassment, prior inappropriate
15 statements or conduct to other patients.
16

17 349. Upon information and belief, Cedars failed to implement sufficient protective policies
18 or procedures to protect Plaintiff JANE DOE#26 from the known risk that BROCK posed.
19

20 350. Plaintiff JANE DOE#26 saw BROCK for her pre-natal visits and for post-natal visits
21 after the delivery of her child, from in or about late 2010 through early 2012. During that time, she had
22 appointments with BROCK at various facilities, including Brock, M.D., Inc., Beverly Hills OBGYN,
23 and Cedars-Sinai Medical Center.
24

25 351. BROCK initially presented as a nice older man who put Plaintiff JANE DOE #26 at
26 ease during her first visit. He also had a chaperone in the room during her first visit. BROCK thereby
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1 garnered and solidified her trust in him which he then took advantage of to sexually assault and abuse
2 her, and to gratify himself.

3 352. BROCK performed what Plaintiff JANE DOE#26 now knows to have been overly
4 lengthy vaginal examinations during every one of her pre-natal visits. BROCK performed these
5 “examinations” without a chaperone present in the room, and without wearing gloves. At the time,
6 Plaintiff JANE DOE#26 thought that these frequent digital examinations, (including the length of these
7 exams) were necessary to ensure the health of her high-risk pregnancy.
8

9 353. Plaintiff JANE DOE#26 was concerned about BROCK’s failure to wear gloves during
10 these examinations because her pregnancy was high risk, and she worried about whether the lack of
11 gloves could introduce bacteria or infection. When she brought this up with nurses on more than one
12 occasion, they did not respond or only responded with words to the effect of “Well, you know Dr.
13 BROCK...” and no corrective action was taken. These causal dismissals of her concerns lulled her into
14 the belief that BROCK’s refusal to wear gloves, as well as the way in which he examined her, must be
15 medically appropriate. Based on Cedars and BROCK’s reputations in the community, as well as the
16 response of these other Cedars’ employees to her questions, Plaintiff JANE DOE #26 continued to trust
17 that she was receiving quality care from a skilled obstetrician at a highly regarded medical facility.
18
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20 354. BROCK also performed recto-vaginal exams during Plaintiff JANE DOE #26’s pre-
21 natal visits which, at the time, and although extremely uncomfortable, Plaintiff assumed were a routine
22 part of pre-natal care. Plaintiff now knows that these very invasive exams are not a routine part of pre-
23 natal care, and also that BROCK performed these examinations in a medically inappropriate manner,
24 for his own sexual gratification, and not because there were specific indications and/or complications
25 with her pregnancy that would warrant the same.
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1 355. Plaintiff JANE DOE #26 had a relatively routine pregnancy with no complications.
2 Despite not having complications, DEFENDANT BROCK insisted on conducting multiple trans-
3 vaginal ultrasounds. He did so, despite the ultrasounds not being medically necessary, for his own
4 sexual gratification.

5
6 356. BROCK also performed a breast “exam” during all or nearly all of Plaintiff JANE DOE
7 #26’s pre-natal visits. BROCK told Plaintiff JANE DOE #26 that he needed to “check her implants”
8 now that she was pregnant, to make sure they were intact. BROCK’s “examinations” of Plaintiff JANE
9 DOE #26’s breasts consisted of BROCK fondling, cupping, holding and massaging her breasts for a
10 long period of time. Plaintiff JANE DOE#26 now knows that both the manner and frequency of
11 BROCK’s breast “exams” were not medically necessary or appropriate but were done to sexually abuse
12 and harass her and to sexually gratify BROCK.
13

14 357. BROCK also asked what Plaintiff JANE DOE #26 now knows to have been
15 inappropriate sexual questions during his examinations. On one occasion, BROCK asked if she had
16 “difficulty having orgasms” and whether she had “orgasmed during the conception of this pregnancy.”
17 During another visit, BROCK told her that if she were his girlfriend, that he would “never cheat on her,
18 not in a million years,” (as her baby’s father had done). Plaintiff JANE DOE #26 now knows that these
19 sexually charged comments and questions have no place in legitimate pre-natal care and were made to
20 sexually harass, embarrass and humiliate her, and to sexually gratify BROCK.
21

22 358. On multiple occasions from 2010 through 2012, BROCK also pushed and prescribed
23 narcotic medications on Plaintiff JANE DOE #26, including pain killers and sleep aids.
24

25 359. When Plaintiff JANE DOE#26 delivered her son in 2011, she was undecided about
26 whether she was going to circumcise her son, telling BROCK that she believed that decision should be
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1 made by her son's father, from whom she was then estranged. Plaintiff JANE DOE #26 therefore left
2 the hospital with the baby uncircumcised.

3 360. In early 2012, during a "routine" examination to which she brought her baby boy,
4 BROCK asked her whether she had decided to have him circumcised. BROCK then asked Plaintiff
5 JANE DOE #26 whether she had ever seen a circumcised penis, gesturing to himself, as though he
6 might show her what one looked like. Plaintiff JANE DOE #26 picked up her son and quickly left the
7 examination room. She was upset and told the nurse at checkout about his comments and about her
8 discomfort as she left the office. No one ever followed up with Plaintiff JANE DOE #26 regarding her
9 complaint.
10

11 361. When Plaintiff JANE DOE #26 learned that BROCK was being sued for sexual
12 misconduct with patients, it occurred to her that his inappropriate discussion of circumcision was not
13 the only time that BROCK had been sexually inappropriate with her. Upon reflection, Plaintiff came
14 to understand that BROCK's previous examinations of her were not performed in a medically
15 appropriate manner, that he had sexually abused, harassed and assaulted her all under the guise of
16 routine examinations, and all in order to sexually gratify himself.
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19 362. Upon learning that BROCK was being sued for sexual misconduct with patients,
20 Plaintiff JANE DOE#26 also now believes that his constant pushing of medications on her – pain
21 killers, sleep medications, and so forth, was grooming behavior. Plaintiff now believes that BROCK's
22 intent in constantly pushing unnecessary medications was to make her reliant on the drugs, and
23 therefore, on him to keep prescribing them, making her more vulnerable to his abuse and requiring her
24 to go back to his office often, to renew the prescriptions where he again had the opportunity to
25 "examine" her.
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1 363. Because BROCK took advantage of Plaintiff JANE DOE#26's vulnerability during her
2 high-risk pregnancy to abuse her, and because Cedars' staff failed to protect her, Plaintiff JANE DOE
3 #26 has experienced feelings of betrayal, humiliation, depression, anxiety, intrusive thoughts and other
4 symptoms of PTSD which have resulted in physical manifestations of that distress including
5 sleeplessness and lack of focus. Plaintiff also suffers from significant headaches and continues to have
6 difficulty trusting medical professionals.
7

8 **Z. Specific Factual Allegations - JANE DOE #27**

9 364. Plaintiff JANE DOE #27 saw BROCK on one occasion in August 2015 for the delivery
10 of her first child at CEDARS-SINAI MEDICAL CENTER.
11

12 365. Plaintiff JANE DOE #27 and her husband went to the hospital for her delivery and she
13 received an epidural for pain relief. After the epidural, BROCK began to examine her. Her husband
14 was present and observed BROCK rub her external genitalia several times. He expressed concern to
15 Plaintiff JANE DOE #27, who brushed off his concerns, telling him BROCK had a reputation as one
16 of the best doctors in the field and wouldn't do anything unprofessional.
17

18 366. After the delivery, BROCK administered additional epidural boluses and began
19 stitching Plaintiff's vaginal area to repair perineal tearing (or so Plaintiff thought). In the process, he
20 told Plaintiff he was going to remove moles around her labia and mons pubis and stitch up the resulting
21 wounds. It was not until later, when Plaintiff was able to resume intercourse with her husband, that she
22 realized BROCK had applied extra stitches to her vagina to make her vaginal opening smaller.
23

24 367. In addition to altering her intimate anatomy, the procedure BROCK performed caused
25 her to experience significant discomfort during intercourse for several months following the procedure.
26 At the time of the procedure, Plaintiff believed that BROCK was being thorough and that his conduct
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1 was medically legitimate. She now realizes that BROCK performed unnecessary procedures to allow
2 him to spend more time manipulating her genital area and for his own sexual gratification.

3 368. Later, only after learning that BROCK was being sued for sexual misconduct involving
4 patients, did Plaintiff JANE DOE #27 come to understand that what BROCK had done to her was
5 sexual assault and abuse. Plaintiff JANE DOE #27 now believes that the way BROCK performed his
6 “exam” during her labor -- and the way in which he sutured her following childbirth – was not
7 medically necessary or appropriate and was not a part of legitimate medical care, but was done to
8 sexually gratify himself.

9
10 369. As a result of BROCK’s sexually abusive behavior during what should have been a
11 happy time for her and her family when her child was born, Plaintiff JANE DOE #27 has suffered
12 feelings of confusion, betrayal and long-lasting physical and emotional harm.
13

14
15 **AA. Specific Factual Allegations - JANE DOE # 28**

16 370. Plaintiff JANE DOE #28 was an established patient of Cedars when she began receiving
17 annual gynecological care from BROCK in the early 2000’s. BROCK conducted annual exams of
18 Plaintiff JANE DOE#28 for several years which included both breast and pelvic exams. Plaintiff placed
19 her trust and confidence in BROCK believing that the healthcare providers at Cedars, and BROCK in
20 particular, were trustworthy and skilled.
21

22 371. BROCK garnered Plaintiff JANE DOE #28’s trust and confidence which he then took
23 advantage of in order to sexually abuse and harass her.
24

25 372. BROCK’s examinations of Plaintiff JANE DOE #28’s breasts were unusually long, and
26 BROCK would regularly make eye contact with her and smile at her while he was performing these
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28

1 examinations. Rather than palpate for lumps, BROCK would massage her breasts, in what Plaintiff
2 now understands to have been an intimate manner, more like a sexual partner would touch her.

3 373. The pelvic exams performed on Plaintiff JANE DOE #28 by BROCK were also
4 unusually long and performed in a manner which Plaintiff now understands to have been non-clinical.
5 For example, during one pelvic exam, BROCK moved his fingers inside Plaintiff JANE DOE#28's
6 vagina in a "cupping" motion rather than feeling her abdominal wall.
7

8 374. BROCK also regularly made what Plaintiff JANE DOE#28 now knows were
9 inappropriate comments, including while he had his fingers inside her. At the time BROCK was making
10 these comments, Plaintiff dismissed them because of his status as a physician, and her belief that a
11 reputable doctor at Cedars would not in fact be making sexually suggestive comments. During one
12 pelvic exam, while his fingers were inside her vagina, BROCK made comments to the effect of, "Your
13 husband is a very lucky man." Following this appointment, Plaintiff ceased her care with BROCK.
14

15 375. There was never a chaperone present during any of Plaintiff JANE DOE #28's physical
16 "examinations" from BROCK.
17

18 376. During the examinations performed by BROCK, Plaintiff JANE DOE #28 was
19 uncomfortable, but believed that a licensed and reputable physician at Cedars would not be involved
20 in anything untoward, and believed that BROCK was performing legitimate and medically necessary
21 examinations.
22

23 377. Only after learning that BROCK was being sued for sexual misconduct involving
24 patients, did Plaintiff JANE DOE#28 come to understand that BROCK performed his physical
25 examinations of her in a non-medical manner for no other reason than his own sexual gratification and
26 to sexually harass and abuse her and to sexually gratify himself. She now knows that the way BROCK
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28

1 performed his breast and pelvic exams was not medically necessary or appropriate and was not a part
2 of legitimate medical care but was done to sexually gratify BROCK.

3 378. As a result of BROCK's sexually abusive behavior, Plaintiff JANE DOE#28 has
4 suffered and continues to suffer feelings of anxiety during pelvic exams and has trust issues with male
5 medical professionals. Plaintiff works in the mental health care field and she has struggled with self-
6 doubt, wondering why she didn't know better. Her judgment and confidence have been deeply affected,
7 and she now lives with anxiety, paranoia, flashbacks, anger, and has experienced several panic attacks.
8

9
10 **BB. Specific Factual Allegations - JANE DOE #29**

11 379. Plaintiff JANE DOE #29 was an established patient of Cedars when, in 1999, pregnant
12 with her first child, she saw Dr. BROCK through the Cedars Medical Group when her regular
13 obstetrician was unavailable.

14 380. Plaintiff JANE DOE #29 placed her trust and confidence in BROCK believing that the
15 healthcare providers at Cedars, and BROCK, in particular, were trustworthy and skilled. BROCK
16 garnered Plaintiff JANE DOE#29's trust and confidence which he then took advantage of in order to
17 sexually abuse and harass her.
18

19 381. During her first appointment with him, Plaintiff JANE DOE#29 recalls BROCK's
20 vaginal examination of her to have been done in a very aggressive and lengthy manner. During the
21 same exam, BROCK told her that she needed a blood transfusion, which, of course, took her attention
22 away from what she now knows to have been a sexually abusive physical examination. When Plaintiff
23 JANE DOE #29 tried to take a moment to digest this information, in order to make an informed
24 decision, BROCK told her to "shit or get off the pot," further distracting her from the physical assault
25 she had just endured.
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1 382. At the time, Plaintiff JANE DOE#29 believed that a licensed physician at Cedars would
2 not have done anything untoward, and despite the rough and lengthy nature of the pelvic exam, believed
3 that BROCK had performed a legitimate and medically necessary examination.

4 383. Plaintiff JANE DOE#29 was scheduled through the Cedars clinic for multiple pre-natal
5 visits with BROCK during her pregnancy with her second child in 2007. During these appointments,
6 BROCK was gruff and physically aggressive with her. On one occasion he shoved the speculum into
7 her, and when she complained that it was very painful, BROCK shamed her and told her she was
8 “acting like a little girl.”
9

10 384. BROCK’s gruff manner made her doubt herself with respect to what was happening in
11 his office and made her believe that BROCK simply had a bad bedside manner. Plaintiff JANE
12 DOE#29 was focused on her pregnancy and her desire to deliver a healthy baby, and believed, based
13 on Cedars’ and BROCK’s reputations and assurances, that she was being provided with high quality
14 care by a skilled obstetrician and gynecologist.
15

16 385. Only after learning that BROCK was being sued for sexual misconduct involving
17 patients, did Plaintiff JANE DOE#29 come to understand what had been done to her. Plaintiff JANE
18 DOE #29 now understands that BROCK performed his physical examinations of her in a non-medical
19 manner for no other reason than his own sexual gratification and to sexually harass and abuse her. She
20 now knows that the way his vaginal exams were performed, was not medically necessary or appropriate
21 and that his physically aggressive exams were not a part of legitimate medical care but were done in a
22 manner to physically intimidate Plaintiff JANE DOE #29, to sexually abuse Plaintiff JANE DOE #29,
23 and sexually gratify BROCK.
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26 386. BROCK delivered Plaintiff JANE DOE #29’s second child in 2007. She explained to
27 BROCK that she did not want, and did not believe that she needed, an episiotomy. She explained that
28

1 she had not had one during the delivery of her first child, as the medical professionals had taken the
2 time to keep her from tearing or needing an episiotomy. BROCK told her that he did not have time for
3 that, and as she started to tear, he told her that he was performing an episiotomy and that she would
4 like it. At the time, Plaintiff JANE DOE #29 trusted BROCK that there was a medical reason for the
5 urgency of this delivery. Plaintiff now believes that BROCK gave her too much Pitocin which caused
6 her to start to tear, and that BROCK mismanaged this delivery in other ways, leading to the
7 developmental delays in her child. Plaintiff JANE DOE#29 now believes that the excessive amounts
8 of Pitocin, and the resulting forced episiotomy were not medically necessary or appropriate and not a
9 part of legitimate medical care but were done in a manner that was abusive to her, and that she now
10 believes gratified BROCK.

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13 387. Because BROCK took advantage of Plaintiff JANE DOE #29 during her pregnancies,
14 when she was at her most vulnerable, to abuse her, Plaintiff JANE DOE#29 has experienced feelings
15 of betrayal, humiliation, depression, and anxiety, which have resulted in physical manifestations of that
16 distress including sleeplessness and lack of focus. BROCK's crude language and poor bedside manner
17 also still haunt her today.

18
19 **CC. Specific Factual Allegations - JANE DOE #30**

20 388. Plaintiff JANE DOE #30 was referred by her internist at Cedars to see Dr. BROCK for
21 routine gynecological care at the Cedars Women's Clinic on Robertson Boulevard in or about 1982.
22 She saw BROCK for gynecological care 2 or 3 times per year until in or about late 1996. Plaintiff
23 placed her trust and confidence in BROCK, believing that the healthcare providers at Cedars, and
24 BROCK, in particular, were trustworthy and skilled. BROCK garnered Plaintiff JANE DOE #30's
25 trust and confidence which he then took advantage of in order to sexually abuse and harass her.
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1 389. During one appointment, as BROCK finished her pelvic examination, and while he was
2 still standing between her legs (which were in the stirrups), he bent his entire body over hers – almost
3 laying completely over her – and performed a breast “exam.” Plaintiff JANE DOE #30 remembers
4 feeling BROCK become aroused during this “exam” as he pressed up against her with nothing but his
5 trousers between them, so that he could reach her breasts. At the time, Plaintiff JANE DOE #30 did
6 not believe that a physician at Cedars would engage in inappropriate behavior and believed that
7 BROCK must have been performing a legitimate and medically necessary examination.
8

9 390. During every single appointment she went to with BROCK over the years, whether for
10 her annual exams, or for a vaginal issue, like a yeast infection, BROCK insisted that he perform a breast
11 exam. BROCK’s breast “exams” were not a short palpation of her breast tissue for lumps; they were
12 for what Plaintiff JANE DOE#30 now knows to have been a prolonged amount of time and performed
13 in a manner more like how a sexual partner—and not a physician—would touch her breasts. Plaintiff
14 JANE DOE #30 also now knows that she did not need a breast exam when she went to BROCK’s office
15 for vaginal issues (which occurred more often than every six months or annually), and that he
16 performed these overly lengthy breast exams purely for his own sexual gratification.
17
18

19 391. During one appointment, with a transvaginal ultrasound wand in his hand, BROCK
20 looked at her and said, “You’re really worn down there.” Plaintiff JANE DOE #30 asked him what he
21 meant. He said, “You must have had a lot of sex in your lifetime.” Plaintiff now knows that BROCK’s
22 coarse and inappropriate comments about her intimate anatomy have no place in legitimate
23 gynecological care, but were made to keep her off balance, and to distract her from the physical liberties
24 he took with her. Although that particular interaction, and those inappropriate words still replay in her
25 mind, at the time Plaintiff JANE DOE #30 continued to trust BROCK, based on Cedars’ and BROCK’s
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1 reputations, as well as her belief that she was being provided with high quality care by a skilled
2 gynecologist.

3 392. During other appointments, BROCK would act in what Plaintiff JANE DOE #30
4 thought was a flirtatious manner, but Plaintiff did not believe that a highly recommended, skilled
5 physician at Cedars would be inappropriate with patients, so she doubted herself and believed that she
6 must have misjudged what was happening in his office.

7
8 393. At some point, Plaintiff JANE DOE#30 talked to her Cedars internist about some of the
9 things that BROCK said to her during her appointments. Her Cedars internist brushed her off and did
10 not seem concerned at all about her experiences with BROCK. He was defensive of BROCK. The way
11 that her trusted internist, who was at the time (on information and belief) employed by Cedars
12 responded to her, convinced her that nothing sexually inappropriate was in fact occurring in BROCK's
13 office and made her continue to trust that she was receiving appropriate care by a skilled gynecologist.

14
15 394. There were rarely, if ever, nurses present when BROCK examined Plaintiff JANE DOE
16 #30.

17
18 395. Plaintiff JANE DOE #30 experienced a physical reaction to seeing BROCK's picture
19 on her news feed in late 2024. Only after learning that BROCK was being sued for sexual misconduct
20 involving patients, did she come to understand what had been done to her. Plaintiff JANE DOE #30
21 now understands that BROCK performed his "exams" in a non-medical manner for no other reason
22 than his own sexual gratification and to sexually harass and abuse her. She now knows that the way
23 he hovered over her, feeling her breasts, as well as the way he conducted all of his breast exams and
24 spoke to her, were not medically necessary or appropriate and were not a part of legitimate medical
25 care, but were done in a manner to physically intimidate Plaintiff JANE DOE #30, to sexually abuse
26 Plaintiff JANE DOE #30, and sexually gratify BROCK.
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1 396. Because BROCK took advantage of Plaintiff JANE DOE #30 during these very
2 vulnerable examinations in order to sexually abuse her, Plaintiff JANE DOE #30 has experienced
3 feelings of betrayal, anxiety, intrusive thoughts and other symptoms of PTSD which have resulted in
4 physical manifestations of that distress including sleeplessness and lack of focus.

5
6 **DD. Specific Factual Allegations - JANE DOE #31**

7 398 Plaintiff JANE DOE #31 is a long-time patient at Cedars. When she became pregnant
8 in 2000, although she asked to be referred to a female obstetrician, Cedars referred her to BROCK.
9 Plaintiff JANE DOE #31 believed that this referral to BROCK might have been because she had
10 delivered her first child prematurely, possibly making this pregnancy higher risk, and necessitating her
11 placement with a specialist.

12
13 399. Plaintiff JANE DOE #31 implicitly trusted the physicians and staff at Cedars. Plaintiff
14 JANE DOE #31 was told and believed that BROCK was a skilled obstetrician and gynecologist and
15 therefore placed her trust in him. BROCK garnered Plaintiff JANE DOE #31's trust and confidence
16 which he then took advantage of in order to sexually abuse and harass her. During the course of his
17 sexually abusive "treatment," BROCK even went so far as to make racially motivated comments about
18 Latinas (Plaintiff JANE DOE #31 is Latina) that are highly offensive and motivated by both racial
19 animus and inappropriate sexual behavior towards his patient.
20

21 400. Plaintiff JANE DOE #31 was under the care of BROCK during her pregnancy from
22 2000 to 2001. She had heightened worries with this pregnancy, as she was anxious to avoid another
23 premature birth. She wanted to follow her doctor's advice perfectly. Plaintiff JANE DOE #31 relied
24 heavily on BROCK's and Cedars' assurances that BROCK was the physician who could provide a high
25 standard of care for her and her baby. She placed her trust and confidence in him, believing that the
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1 healthcare providers at Cedars, and BROCK, in particular, were trustworthy and skilled and could
2 ensure a successful gestation and delivery.

3 401. During the time that she was a patient of BROCK, Plaintiff JANE DOE #31 was lulled
4 into the belief that she was being provided with high quality care by a skilled obstetrician and
5 gynecologist, while she now knows that she was being sexually harassed, assaulted and abused by him.
6

7 402. BROCK performed multiple vaginal examinations during every one of Plaintiff JANE
8 DOE #31's pre-natal visits. Plaintiff JANE DOE #31 now knows that in addition to being too
9 numerous, these vaginal exams were also overly lengthy and sexual in nature. BROCK would put his
10 fingers inside her multiple times, for long periods of time, during each visit. Plaintiff now knows that
11 the way the vaginal exams were performed, as well as the frequency of the vaginal exams, were not
12 medically necessary or appropriate and were not a part of legitimate medical care, but were done to
13 sexually harass and abuse Plaintiff JANE DOE #31, and to sexually gratify BROCK.
14

15 403. BROCK also performed what Plaintiff JANE DOE #31 now knows to have been
16 unnecessary and abusive breast exams at all, or nearly all, of her pre-natal appointments. Plaintiff
17 JANE DOE #31 was large breasted before she was pregnant, and her breasts were very full during the
18 time that she saw BROCK because she had gained weight with her pregnancy. Looking back, BROCK
19 always seemed to enjoy these examinations and would look at her for an extended period in a leering
20 manner.
21

22 404. During these "exams," BROCK would also make comments about Plaintiff being a
23 "full-figured Latina." BROCK also told Plaintiff that, "you Latinas are such good breeders." During
24 another visit she mentioned a heaviness in her vagina and BROCK said "Well, you *are* Latina."
25

26 405. Plaintiff JANE DOE #31 now knows that these frequent pelvic and breast exams were
27 unnecessary and were performed in a non-medical manner. Plaintiff JANE DOE #31 also now knows
28

1 that his comments were not relevant, nor were they a part of legitimate healthcare. Plaintiff JANE
2 DOE #31 also now knows that the way BROCK ogled her, and the comments he made to and about
3 her, were meant to keep her off balance so that he could more easily take advantage of her to sexually
4 harass and abuse her, and gratify himself

5
6 406. Plaintiff JANE DOE #31's baby was born five days after its due date. Plaintiff JANE
7 DOE #31 went to see BROCK each one of those 5 days. During each of those five visits, BROCK
8 performed what Plaintiff now knows to have been overly lengthy vaginal exams and told her that,
9 "More sex would help." In the hospital, BROCK let her labor for more than 15 hours with no epidural
10 and then took the baby via emergency C-Section. During those 15 hours that she was in labor, BROCK
11 performed multiple vaginal exams, and was having his students perform vaginal exams on her as well.
12 At one point, a nurse questioned why they were examining her so frequently.
13

14 407. These vaginal examinations continued until Plaintiff JANE DOE #31's mother finally
15 intervened and told them that Plaintiff had had enough. Her mother (who works in healthcare) asked
16 BROCK, "Why do you need to do this so many times?" But BROCK misled her – he responded to her
17 mother, that "this was all very normal," that he needed to "check her uterus," and that he was "just
18 being thorough."
19

20 408. Plaintiff JANE DOE #31 was so upset by the multiple invasive exams and the
21 uncomfortable and unprofessional manner in which her delivery proceeded, that she asked to be
22 discharged the next day. Because of her early discharge, her incision opened and became infected.
23 Plaintiff now understands that she was sexually harassed and abused by BROCK (who also involved
24 his students in order to give the conduct the guise of legitimacy) and that these multiple invasive exams
25 were not part of legitimate health care but were done to sexually gratify BROCK.
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1 409. When Plaintiff JANE DOE #31 learned that patients were suing Dr. BROCK for his
2 sexually harassing, abusive, and unprofessional conduct involving patients, she realized that what he
3 did to her was sexually abusive.

4 410. Because BROCK took advantage of Plaintiff JANE DOE # 31's private nature, her
5 vulnerability and fears of delivering a premature baby to abuse her, Plaintiff JANE DOE# 31 has
6 experienced feelings of betrayal, humiliation, depression and anxiety, which have resulted in physical
7 manifestations of that distress including sleeplessness and lack of focus.

8
9 **EE. Specific Factual Allegations - JANE DOE #33**

10 411. Plaintiff JANE DOE #33 became a patient of BROCK when she was pregnant with her
11 daughter, in approximately 1995. She saw BROCK throughout her pregnancy at Cedars-Sinai and
12 BROCK delivered her baby at Cedars-Sinai Hospital.

13 412. When Plaintiff became pregnant with her daughter, she was only twenty-eight years old
14 and had never before received obstetric care. During multiple obstetric appointments with BROCK,
15 BROCK required her to undergo breast exams. Plaintiff JANE DOE #33 had already received a breast
16 exam during her annual gynecological exam and had not experienced any irregularities. However, she
17 did not question BROCK's decision to require her to undergo additional breast exams during her
18 pregnancy due to her inexperience with pre-natal care.

19 413. In addition to performing exams that were not medically necessary, BROCK took
20 advantage of Plaintiff JANE DOE #33 during the breast exams that he required her to undergo during
21 her pregnancy, for his own sexual gratification. BROCK would pull Plaintiff's privacy covering off
22 so her breasts were fully exposed. For several moments, BROCK would then fondle her breasts in a
23 way she now realizes was not medically necessary. During one particular exam, he complimented her
24 on her "large breasts" and stated that her husband must be "very happy."

1 414. BROCK also required Plaintiff JANE DOE #33 to undergo multiple unnecessary
2 pelvic/vaginal exams early in her pregnancy, during which BROCK “examined” her vagina with his
3 fingers. At the time, Plaintiff believed BROCK was conducting medically legitimate pre-natal exams.
4 She now realizes he took advantage of her inexperience and vulnerability to sexually assault her. No
5 chaperones were present in the room with BROCK when he performed intimate exams on Plaintiff.
6

7 415. In or about early 2025, Plaintiff JANE DOE #33 realized that BROCK’s exams were
8 sexual assaults committed in the guise of conducting medically legitimate treatment. As a result of that
9 realization, she has suffered humiliation, embarrassment, anxiety, and other symptoms of PTSD.
10

11 **FF. Specific Factual Allegations - JANE DOE #34**

12 416. Plaintiff JANE DOE #34 became a patient of Dr. Barry BROCK when she was pregnant
13 with her first child in 2004. She continued seeing him throughout her first pregnancy at Cedars-Sinai
14 Health System and again when she was pregnant with her second child in 2005. BROCK also delivered
15 both of her babies at Cedars-Sinai Medical Center on August 31, 2004, and November 5, 2005,
16 respectively. At the time, Plaintiff was in her twenties and was inexperienced with pre-natal care, but
17 she trusted BROCK and expected she would receive high-quality and professional care at Cedars.
18

19 417. Throughout each of Plaintiff JANE DOE #34’s pregnancies, BROCK required Plaintiff
20 to undergo vaginal and breast exams multiple times. When BROCK conducted the breast exams, he
21 would spend a prolonged period of time massaging, cupping and brushing her breasts and nipples.
22 BROCK did not explain why he needed to perform these pre-natal breast exams and Plaintiff believed
23 the care to be legitimate, as she had no basis for comparison.
24

25 418. BROCK also conducted multiple pre-natal vaginal exams that included moving his
26 fingers in an “in and out motion” inside her vagina. At the time, Plaintiff JANE DOE #34 believed
27 BROCK was administering a thorough, professional exam that would ensure she and her baby would
28

1 be safe. She now realizes that the breast and vaginal exams were not medically necessary – and that
2 the way the exams were conducted was sexual in nature.

3 419. Plaintiff JANE DOE #34 only recently discovered that BROCK’s behavior during her
4 medical appointments was sexual and inappropriate. As a result of that discovery, she has struggled
5 with significant symptoms associated with PTSD. Plaintiff is attending therapy; however she fears that
6 she may never fully recover from the distress and anxiety caused by the abuse.
7

8 **GG. Specific Factual Allegations - JANE DOE #36**

9 420. Plaintiff JANE DOE #36 was an established patient of Cedars.
10 When she became pregnant with her first child in 2007, her regular obstetrician suggested that she see
11 the other doctors in her practice, as any one of them might be the doctor that delivered her baby. So,
12 when Plaintiff JANE DOE #36 called to schedule an appointment and was told that her regular
13 obstetrician was unavailable, but that BROCK was available, she scheduled her regular pre-natal
14 appointment with BROCK.
15

16 421. This was Plaintiff JANE DOE #36’s first pregnancy, and pre-natal examinations were
17 new to her. Plaintiff JANE DOE #36 placed her trust and confidence in BROCK, believing that the
18 healthcare providers at Cedars, and BROCK, in particular, were trustworthy and skilled. BROCK
19 garnered Plaintiff JANE DOE #36’s trust and confidence which he then took advantage of in order to
20 sexually abuse and harass her.
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22 422. During this appointment, Plaintiff JANE DOE #36 remembers BROCK using what she
23 believes were ungloved fingers and checking her very roughly. The “exam” felt different than other
24 such exams, like he was using too many fingers and was very aggressive with her. BROCK’s
25 aggressive movements jerked her entire body during this examination.
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1 423. During what she now knows to have been an assault, Plaintiff JANE DOE #36 was
2 trying to process what was happening. Plaintiff JANE DOE#36 (who had never before been examined
3 by a male gynecologist) believed that a licensed physician at Cedars would not be involved in anything
4 untoward and that BROCK was performing a legitimate and medically necessary examination.

5 424. Plaintiff JANE DOE #36 made sure that she never had another appointment with
6 BROCK, because the examination had been so traumatizing, but she continued to believe, based on
7 Cedars' and BROCK's reputations and assurances, that she had been provided with high quality care
8 by a skilled obstetrician and gynecologist.

9 425. Only after learning that BROCK was being sued for sexual misconduct involving
10 patients, did Plaintiff JANE DOE #36 come to understand what had been done to her. Plaintiff JANE
11 DOE #36 now understands that BROCK performed this exam in a non-medical manner for no other
12 reason than his own sexual gratification and to sexually harass and abuse her. She now knows that the
13 way this vaginal exam was performed was not medically necessary or appropriate and was not a part
14 of legitimate medical care but was done in a manner to physically intimidate Plaintiff JANE DOE #36,
15 to sexually abuse Plaintiff JANE DOE #36, and sexually gratify BROCK.

16 426. Because BROCK took advantage of Plaintiff JANE DOE #36's vulnerability as a
17 primigravida to abuse her, Plaintiff JANE DOE #36 has felt ashamed for not knowing better, has
18 experienced feelings of betrayal, humiliation, depression, anxiety, intrusive thoughts and other
19 symptoms of PTSD which have resulted in physical manifestations of that distress including
20 sleeplessness and lack of focus.

21 **HH. Specific Factual Allegations - JANE DOE #37**

22 427. Plaintiff JANE DOE #37 began receiving pre-natal gynecological care from BROCK in
23 or about 1998 when she was in her late twenties. BROCK provided treatment to Plaintiff JANE DOE
24

1 #37 throughout her pregnancy, including breast and pelvic exams at every single appointment. Prior to
2 receiving treatment from BROCK, Plaintiff JANE DOE #37 had no experience with gynecological or
3 obstetric exams.

4 428. The pre-natal pelvic exams which BROCK performed on Plaintiff JANE DOE #37 were
5 unusually long and were performed in what Plaintiff now understands was a non-clinical manner
6 designed to sexually stimulate Plaintiff and gratify BROCK. BROCK also required her to undergo
7 unnecessary breast exams at all, or nearly all, of her pre-natal appointments. These breast exams
8 involved touching and massaging Plaintiff's breasts and nipples. At the time, Plaintiff believed
9 BROCK was being thorough and did not question his behavior. She now knows he took advantage of
10 her young age and inexperience to sexually assault her.
11

12 429. At no time was a chaperone present for any of the exams conducted by BROCK.
13

14 430. During the examinations, Plaintiff JANE DOE #37 was uncomfortable, but believed
15 that a licensed physician at Cedars would not be involved in anything untoward and further believed
16 that (especially as she had no experience with gynecological exams) BROCK was performing exams
17 in a legitimate and medically necessary manner.
18

19 431. Only after learning that BROCK was being sued for sexual misconduct involving
20 patients, did Plaintiff JANE DOE #37 understand that what had been done to her was wrong. Plaintiff
21 JANE DOE #37 now realizes that BROCK performed his exams in a non-medical manner for no other
22 reason than his own sexual gratification and to sexually harass and abuse her. She now knows that the
23 way his breast and pelvic exams were performed was not medically necessary or appropriate but was
24 done to sexually gratify BROCK.
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1 432. As a result of BROCK's sexually abusive behavior, Plaintiff JANE DOE #37 has
2 suffered and continues to suffer feelings of humiliation, flashbacks of the abusive conduct, severe
3 anxiety, and other symptoms of PTSD.

4 **II. Specific Factual Allegations - JANE DOE #38**

5 433. Plaintiff JANE DOE #38 was a pre-natal patient of advanced maternal age when she
6 started seeing BROCK at the Cedars Clinic on Robertson Boulevard in 1996. She was informed and
7 believed, based in large part upon the reputation of Cedars in the community, that she would receive
8 top quality healthcare from skilled and trustworthy obstetricians. Plaintiff was at a very vulnerable
9 point in her life when she went to see BROCK – she had been rushed into marriage with a husband
10 who was abusive to her and was not able to discuss what began as an out-of-wedlock pregnancy with
11 her mother, who, due to her ethnic and cultural background, strongly disapproved. Plaintiff
12 communicated her isolation and vulnerability to BROCK, who garnered her trust and confidence which
13 he then used to take advantage of her in order to sexually abuse and assault her.

14 434. This was Plaintiff JANE DOE #38's first full-term pregnancy, and pre-natal
15 examinations were new to her. Thus, when BROCK performed a lengthy vaginal exam during every
16 single one of her pre-natal visits, Plaintiff trusted that this was necessary and standard. Plaintiff JANE
17 DOE #38 now knows that she did not need these overly lengthy vaginal exams during every single pre-
18 natal visit, and that BROCK performed those examinations to sexually harass her and to sexually
19 gratify himself.

20 435. In February of 1997, Plaintiff JANE DOE #38 was two weeks past her due date when
21 she went to see BROCK. The office personnel told her that they would need to schedule a time to
22 induce her labor because of her age. However, rather than allowing her to schedule that induction, when
23 BROCK came in to examine her, he violently inserted his fingers into her vagina and tore her
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1 membranes. The forcefulness with which BROCK performed this “procedure” made her jump back in
2 pain. BROCK had not explained the medical necessity for this “procedure,” he had not gained her
3 authorization or consent for this “procedure,” and it was painful, humiliating and barbaric.

4 436. During what she now knows was a sexual battery, Plaintiff JANE DOE #38 was trying
5 to process what was happening to her. Plaintiff JANE DOE #38 believed that a licensed physician at
6 Cedars would not be involved in anything untoward, and believed that, however wrong and painful it
7 felt, BROCK must be performing a legitimate and medically necessary procedure. Plaintiff now knows
8 that she was sexually battered under the guise of a routine medical procedure, and that it was done in
9 a manner that sexually gratified BROCK.

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11 437. Plaintiff JANE DOE #38 lost her mucus plug the night of the battery, and she presented
12 that next day to deliver her child. When she arrived at the office, and told them that she had lost her
13 mucus plug due to this “procedure,” the office staff laughed and joked, ‘Where did it go?’ And while
14 she was still humiliated and did not think it was funny, their responses reinforced for her that what
15 BROCK had done must have been medically appropriate.

16
17 438. Plaintiff JANE DOE #38’s baby went into the neonatal intensive care unit for
18 dehydration shortly after the delivery. Plaintiff JANE DOE #38 did not have time to think back or to
19 process what happened to her in BROCK’s office before the delivery because she had so much more
20 to worry about. She also continued to trust that a reputable hospital like Cedars would have required
21 BROCK to have acted in medically appropriate ways with her.

22
23 439. Only after learning that BROCK was being sued for sexual misconduct involving
24 patients, did Plaintiff JANE DOE #38 come to understand what had been done to her. Plaintiff JANE
25 DOE #38 now understands that BROCK performed frequent prenatal pelvic exams and other
26 “treatment” in a non-medical manner for his own sexual gratification and to sexually harass and abuse
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her. She now knows that the frequency and length of the vaginal exams that he performed during every single visit were also not medically necessary or appropriate and were not a part of legitimate medical care, but were done to sexually abuse Plaintiff JANE DOE #38, and sexually gratify BROCK.

440. Because BROCK took advantage of Plaintiff JANE DOE #38's inexperience, vulnerability and isolation to abuse her, Plaintiff JANE DOE #38 has experienced feelings of betrayal, humiliation, depression, anxiety, intrusive thoughts and other symptoms of PTSD which have resulted in physical manifestations of that distress including sleeplessness and lack of focus.

JJ. Specific Factual Allegations - JANE DOE #39

441. Plaintiff JANE DOE #39 was a gynecologic and obstetric patient of Dr. Barry BROCK at Cedars-Sinai for several years, until in or about 1994. She stopped seeing BROCK following the birth of her son in 1994. Throughout the time she treated with BROCK, she trusted that she was receiving quality medical care from a professional, experienced physician.

442. During Plaintiff JANE DOE #39's appointments, BROCK conducted pelvic exams that involved moving his fingers in an "in and out" motion inside her vagina. Following the pelvic exams, he would rub and squeeze her breasts and use his fingers to fondle and circle her areolas and nipples. Before the breast exams, BROCK would pull Plaintiff's privacy sheet down to her waist and leave it there through the exam, so she was completely exposed throughout. Plaintiff felt embarrassed during the exams, but believed that BROCK's behavior was appropriate and medically necessary.

443. BROCK frequently gave Plaintiff JANE DOE #39 rectal exams, during which he moved two (and at times three) fingers in and out of her rectum. During one appointment, following a rectal exam, he broached the subject of anal sex with Plaintiff's husband, who was present at the appointment. Unsolicited, BROCK began telling Plaintiff's husband how to best perform anal sex with her and recommended placing his penis in her vagina first and then placing it in her anus. Plaintiff JANE DOE

1 #39 was so humiliated and revolted that she went to the bathroom in tears. Looking back, Plaintiff
2 realizes that BROCK gave Plaintiff unnecessary rectal exams and made sexually harassing comments
3 to humiliate her, for his own sexual gratification.

4 444. When Plaintiff JANE DOE #39 became pregnant, BROCK required her to submit to
5 frequent vaginal, breast, and rectal exams during her pre-natal appointments. When conducting these
6 exams, BROCK did not explain why they were necessary or what he was looking for. Plaintiff now
7 realizes that the exams themselves – and the way they were conducted – were not medically legitimate.

8 445. Two months prior to her due date, Plaintiff JANE DOE #39's amniotic sac broke causing
9 her to go into premature labor. Plaintiff underwent thirty-six hours of active labor before her baby flat
10 lined inside her womb from exhaustion. Looking back, Plaintiff now realizes that in addition to
11 enduring a difficult birth and fearing for the survival of her baby, she was also systematically abused
12 by BROCK throughout her pregnancy. As a result of that realization, Plaintiff has experienced
13 significant emotional trauma and has been diagnosed with Severe Depression, Severe Anxiety, and
14 Post-Traumatic Stress Disorder. Plaintiff feels humiliated for being taken advantage of by someone
15 she so highly trusted and can no longer trust male doctors. Although her current gynecologist is a
16 female, she feels extremely anxious during exams and worries about being examined alone, without
17 the presence of a chaperone.

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21 **KK. Specific Factual Allegations - JANE DOE #40**

22 446. Plaintiff JANE DOE #40 started seeing BROCK for obstetric care at the Cedars-Sinai
23 Medical Center in or about August 1994, when she was 29 years old. At the time, Plaintiff was a Cedars
24 employee and believed, based on Cedars-Sinai Medical Center's elite reputation in the Los Angeles
25 medical community, that she would receive high quality professional care. Prior to seeing BROCK
26 after becoming pregnant, Plaintiff had never before been to a gynecologist.
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1 447. Plaintiff JANE DOE #40 saw BROCK until he delivered her first baby, a girl, in 1995.
2 Soon after birth, Plaintiff moved to Colorado. She returned to Los Angeles many years later, when her
3 daughter was eighteen years old. Plaintiff believed BROCK was one of the best in his field so naturally,
4 when her daughter needed to start receiving gynecological care, she referred her daughter to BROCK.
5 Plaintiff now knows that her daughter—whom BROCK had delivered—was sexually assaulted at her
6 first ever gynecological appointment while Plaintiff waited for her in the Cedars Medical Group waiting
7 area. Plaintiff deeply regrets her decision to refer her daughter to BROCK, as it has caused her to
8 experience ongoing and significant guilt and emotional distress.

10 448. Because Plaintiff JANE DOE #40 herself had little or no experience with gynecological
11 exams or treatment prior to seeing BROCK, she never questioned his techniques when she started
12 seeing him as a young woman. In fact, Plaintiff appropriately assumed that BROCK would engage in
13 legitimate contact with her body and did not question his behavior until very recently. Since hearing of
14 the allegations made against BROCK in or about late 2024, she has reflected on her experiences and
15 realized that BROCK sexually assaulted during her appointments, in the guise of providing legitimate
16 obstetric and gynecological care.

19 449. During almost every, if not every, pre-natal appointment Plaintiff JANE DOE #40
20 attended with BROCK, BROCK performed a breast and pelvic exam. At the time, Plaintiff believed
21 these exams were a necessary part of pre-natal care but now realizes the exams themselves were not
22 necessary – and that the way BROCK conducted them was not medically legitimate. When BROCK
23 gave Plaintiff her breast exams, he rubbed her nipples and instructed her that she needed to do this too,
24 in order to “develop milk.” In addition, he frequently complimented her intimate areas and told her she
25 had “beautiful breasts.”
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1 450. During the several pre-natal pelvic/vaginal exams that BROCK gave Plaintiff JANE
2 DOE #40, he would insert his bare fingers into her vagina, without the protection of gloves. Likewise,
3 BROCK required Plaintiff to submit to several rectal exams during her pregnancy, which he also
4 performed without gloves. Multiple times during her pelvic exams, Plaintiff visually observed that
5 BROCK had an erection. While conducting the exams, she sometimes felt his erection touch her leg.
6 Plaintiff felt embarrassed but thought that he could not help himself because he was a man.

7
8 451. Throughout Plaintiff JANE DOE #40's exams, BROCK made comments that Plaintiff
9 now realizes were sexually motivated, such as, "[Y]ou're looking so hot today; it makes me want to do
10 a pelvic exam on you right now." When she would leave the exam room, BROCK would always hug
11 and kiss her goodbye on the cheek, at times missing her cheek and brushing her lips.

12
13 452. During Plaintiff JANE DOE #40's exams, BROCK did not provide her with a paper
14 gown to cover her intimate areas. Therefore, throughout the exams, she remained exposed and on
15 display. Plaintiff felt cold and uncomfortable but due to her lack of experience, believed that the
16 circumstances were ordinary and told herself to just make it through the exams.

17
18 453. When Plaintiff JANE DOE #40 went into labor at forty-two weeks, her baby's heart rate
19 began declining and BROCK had to perform an emergency C-Section delivery. After the surgery,
20 BROCK checked on Plaintiff and he told her, "I cut that tiny tattoo on your lower abdomen off since I
21 thought it was disgusting and needed to be cleaned up." Plaintiff felt stunned and embarrassed, because
22 she had never thought of her tattoo as disgusting; it was a small, discreet Asian symbol for good luck
23 that she valued for the many years she had it. BROCK had in fact made her C-section incision in such
24 a way that the tattoo was removed without her knowledge or consent and apparently without medical
25 necessity.
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1 454. During Plaintiff JANE DOE #40's pre-natal appointments, she was alone in the room
2 with BROCK. No chaperone was present during any of Plaintiff's appointments to observe BROCK's
3 misconduct, which – at the time--further affirmed Plaintiff's beliefs that BROCK's techniques were
4 appropriate.

5 455. Since Plaintiff JANE DOE #40's recent realization that she was sexually abused by
6 BROCK, that her child was sexually abused and harassed by BROCK, and that Cedars failed to protect
7 them, she has suffered severe emotional upset. The realization that she put her own child in the hands
8 of a sexual predator has caused Plaintiff to doubt her judgment in all aspects of her life. She is extremely
9 troubled by the recent revelation that she was systemically abused, as was her daughter– a revelation
10 that has interfered with her otherwise close relationship with her daughter.
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14 **LL. Specific Factual Allegations - JANE DOE #41**

15 456. Plaintiff JANE DOE #41 received gynecological care from Dr. Barry BROCK at
16 Cedars-Sinai Medical Group from in or about 2001 to in or about 2003. Plaintiff struggled with frequent
17 bacterial infections which required her to see BROCK as often as every two months. Plaintiff believed
18 that Cedars hired only the best doctors and believed she would receive elite and professional care from
19 BROCK.
20

21 457. Throughout the course of her care, BROCK gave Plaintiff JANE DOE #41 several
22 breast exams that involved rubbing and massaging her nipples with his bare, ungloved hands for several
23 minutes. Plaintiff had undergone a breast lift procedure, which BROCK complimented while
24 massaging Plaintiff's nipples. During one exam, he said, "You have perky ones [breasts] now. You
25 don't need to wear a bra. You're a beautiful woman."
26

27 458. BROCK frequently gave Plaintiff JANE DOE #41 rectal exams, purportedly to check
28 for cysts. During one appointment, after giving her a vaginal exam, he directed her to turn over. He

1 then thrust his fingers into her rectum and leaned over her body to the point that he was so close she
2 could feel his breath on the back of her neck and back. At the time, Plaintiff did not know how rectal
3 exams, if necessary, are appropriately performed. She believed that BROCK's conduct was legitimate
4 and medically necessary and further believed that any discomfort she was experiencing was
5 unwarranted.
6

7 459. During multiple appointments, BROCK also gave Plaintiff JANE DOE #41 a
8 transvaginal ultrasound which involved moving the transducer wand gently in and out of her vagina
9 and using the wand to touch her clitoris. On one occasion, when touching her clitoris, he told Plaintiff
10 that her clitoris was "too big" and that he could "cut it down" if she agreed. On another, while moving
11 the transducer wand in and out of her vagina, he asked, "Do you want your husband to be this big?"
12 and said, "This thing is probably longer than your husband and even bigger than me."
13

14 460. BROCK also frequently touched and rubbed Plaintiff JANE DOE #41's labia,
15 purportedly checking for cysts. The way BROCK touched Plaintiff made her feel, to her horror,
16 sexually stimulated. Plaintiff felt humiliated and guilty to have sexual reactions during her
17 gynecological exams and blamed herself, assuming it was her fault.
18

19 461. Unfortunately, BROCK took advantage of her trust to physically abuse Plaintiff as
20 described herein and to humiliate Plaintiff. When Plaintiff JANE DOE #41 saw BROCK several times
21 to receive treatment for yeast infections, he suggested that her symptoms resulted from her husband
22 having given her a sexually transmitted disease by having multiple partners. Plaintiff generally thought
23 of BROCK as a kind and caring practitioner, as he often spent extra time talking with her to see how
24 she was doing during her appointments. Therefore, when he made comments directed at her intimate
25 anatomy or her relationship with her husband, she believed he meant well and was just trying to help
26 her. She now realizes that his kindness and willingness to spend more time talking with her during
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1 appointments was a method of grooming her so that he could more easily sexually abuse her during
2 exams.

3 462. Chaperones were never present during Plaintiff JANE DOE #41's appointments to
4 observe Dr. BROCK's behavior, nor did BROCK ever mention the idea of a chaperone.
5

6 463. Plaintiff JANE DOE #41 stopped seeing BROCK in or about 2003 because she became
7 pregnant and needed to see another doctor for her high-risk pregnancy. After her pregnancy, her
8 insurance changed and would no longer cover care with BROCK. Otherwise, Plaintiff would have
9 continued treating with BROCK and believed him to be a competent and professional physician.
10

11 464. In or about the end of 2024, Plaintiff JANE DOE #41 discovered the allegations made
12 against BROCK. She then reflected on her experiences and came to realize that the way BROCK had
13 touched her was sexual in nature and devoid of medical legitimacy. As a result of her realization, she
14 has struggled with significant emotional upset and post-traumatic stress.
15

16 **MM. Specific Factual Allegations - JANE DOE #42**

17 465. Plaintiff JANE DOE #42 saw Dr. Barry BROCK in or about 1996 for pre-natal care at
18 CEDARS SINAI MEDICAL GROUP, when she was pregnant with her first child. Plaintiff was excited
19 to be pregnant with her first child and believed Cedars to be an elite medical provider that hired high-
20 quality, professional physicians. Instead, Plaintiff was subjected to egregious sexual abuse by BROCK.
21

22 466. Given that Plaintiff JANE DOE #42 was pregnant for the first time, she was unfamiliar
23 with pre-natal care. BROCK took advantage of her trust and inexperience to perform procedures that
24 Plaintiff now understands were unnecessary and sexually motivated. Plaintiff was required to attend
25 pre-natal appointments approximately every month, during which time BROCK would require her to
26 undergo multiple vaginal "exams" – procedures Plaintiff now realizes were not necessary for pre-natal
27 care.
28

1 467. In addition, the manner in which BROCK conducted the vaginal exams was sexual in
2 nature. For example, during one of Plaintiff JANE DOE #42's initial appointments, BROCK invited a
3 male medical student to observe him examining Plaintiff. BROCK proceeded to perform a vaginal
4 exam on Plaintiff, during which he conducted an "anatomy lesson" and pointed out Plaintiff's vulva
5 and clitoris, touching them with his bare fingers in the process. Plaintiff felt humiliated, having her
6 intimate anatomy on display and being manipulated, but tried to disassociate from what was happening,
7 assuming that BROCK's conduct was normal for a teaching physician. Looking back, she now realizes
8 that BROCK's behavior was highly inappropriate and done for his own sexual gratification.

10 468. BROCK ultimately delivered Plaintiff JANE DOE #42's baby at Cedars-Sinai Medical
11 Center. Plaintiff experienced a particularly long labor and vaginal tearing. After the delivery, BROCK
12 told Plaintiff that he stitched her up "tighter than [she] used to be" and that he was "confident it would
13 please [her] husband." At the time, Plaintiff was focused on the health and safety of her baby and
14 trusted BROCK. She now realizes that BROCK, in stitching her up to be "tighter," made unnecessary
15 changes to her intimate anatomy purely for his own sexual gratification.

17 469. Plaintiff JANE DOE #42's realization that she was subjected to repeated sexual abuse
18 and harassment by BROCK has caused her to experience severe humiliation, anxiety, unsettling
19 flashbacks and other symptoms of post-traumatic stress disorder.

21 **NN. Specific Factual Allegations - JANE DOE #43**

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23 470. Plaintiff JANE DOE #43 was an employee of Cedars and received her regular
24 gynecological care from Cedars. She believed that Cedars provided the very best healthcare in
25 Southern California. In around 1999, Plaintiff JANE DOE #43 was experiencing severe abdominal
26 pain, and was referred by a co-worker to BROCK because BROCK was the "go to" gynecologist to
27 resolve complex gynecological issues at Cedars at the time. Plaintiff placed her trust and confidence
28

1 in BROCK believing that the healthcare providers at Cedars, and BROCK, in particular, were
2 trustworthy and skilled. BROCK garnered Plaintiff JANE DOE #43's trust and confidence which he
3 then took advantage of in order to sexually abuse and harass her.

4 471. During her first visit to BROCK's office, BROCK performed a digital vaginal exam
5 that was very aggressive. Plaintiff JANE DOE #43 was already in a tremendous amount of pain, and
6 the forceful manner in which he examined her made her wince and shrink back in pain. Although very
7 traumatizing at the time, Plaintiff did not believe that a physician in this reputable practice would be
8 engaging in inappropriate behavior and believed that BROCK must have been performing a legitimate
9 and medically necessary examination in order to respond to her specific issues.

10 472. During the same visit, BROCK performed a breast "exam," even though Plaintiff JANE
11 DOE #43 was already an established gynecological patient at Cedars and was in his office only to
12 address her severe abdominal pain. At the time, Plaintiff JANE DOE #43 trusted BROCK and Cedars,
13 based on her understanding of their outstanding reputations in the community, that this breast "exam"
14 was medically necessary and somehow relevant to the diagnosis of her gynecological issues. Plaintiff
15 JANE DOE #43 now knows that she did not need a breast "exam" from BROCK, that it was not in fact
16 medically necessary to the diagnosis regarding her severe abdominal pain and that it was performed to
17 sexually harass her and to sexually gratify BROCK.

18 473. BROCK's breast "exam" was not a short palpation of her breast tissue for lumps.
19 During this breast "exam," BROCK stood behind her, reached around her, and "massaged" her breasts
20 with both of his ungloved hands. This breast "exam" by BROCK was performed during the time that
21 gynecologists were promoting self-breast exams and handing out pamphlets to hang in your shower
22 illustrating self-exam techniques, and BROCK convinced Plaintiff JANE DOE #43 that he was
23 showing her how to perform these self-care exams. Plaintiff JANE DOE #43 now knows that BROCK
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1 did not perform this breast “exam” in a medically necessary or appropriate manner, but that his
2 prolonged massaging of her breasts with both of his ungloved hands was more like how a sexual
3 partner—and not a physician—would touch her breasts. Plaintiff JANE DOE #43 also now knows that
4 BROCK performed this inappropriate breast “exam” purely for his own sexual gratification.

5
6 474. There was no nurse present during Plaintiff JANE DOE #43’s first “exam.” She was
7 alone in the examination room with BROCK.

8 475. During her second visit with BROCK, a nurse was present during her physical exam.
9 During this appointment, BROCK made what Plaintiff JANE DOE #43 now understands to have been
10 inappropriate and racially motivated comments. BROCK told her that she had a tumor the size of a
11 grapefruit in her uterus, and that “since she was already a single mother of 3,” that she should just “go
12 ahead and get a full hysterectomy already.” At the time, Plaintiff JANE DOE #43 believed that
13 BROCK’s comments were part of a legitimate medical diagnosis. (Further consultation with another
14 gynecologist revealed no need for a full hysterectomy as urged by BROCK, and a partial hysterectomy
15 was later performed.)
16

17 476. Plaintiff JANE DOE #43 now understands that BROCK’s comments have no place in
18 legitimate gynecological care and that BROCK made these comments and recommendations to her
19 because she is a Black woman. Although she trusted that she was receiving high quality care by a
20 skilled gynecologist at the time, Plaintiff JANE DOE #43 now believes that BROCK took advantage
21 of what he saw as a powerless Black woman to sexually abuse, humiliate, and harass her and to sexually
22 gratify himself.
23

24 477. Plaintiff JANE DOE #43 experienced a physical reaction to seeing BROCK’s picture
25 on the internet in early 2025. Only after learning that BROCK was being sued for sexual misconduct
26 involving patients, did she come to understand what had been done to her. Plaintiff JANE DOE #43
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1 now understands that BROCK performed his “exams” in a non-medical manner for no other reason
2 than his own sexual gratification and to sexually harass and abuse her. She now knows that the way
3 he hurt her during her vaginal exam, as well as the way he conducted his breast “exam” and spoke to
4 her, were not medically necessary or appropriate and were not a part of legitimate medical care, but
5 were done in a manner to physically intimidate Plaintiff JANE DOE #43, to sexually abuse Plaintiff
6 JANE DOE #43, and sexually gratify BROCK.
7

8 478. Plaintiff JANE DOE #43 survived a rape assault prior to the time that she saw BROCK,
9 and was also witness to another Cedars employee’s suicide while at work. She was therefore a very
10 vulnerable patient when she put her trust in BROCK to help her during this painful time in her life,
11 making BROCK’s sexual assaults even more impactful on her.
12

13 479. Because BROCK took advantage of Plaintiff JANE DOE #43 during these very
14 vulnerable examinations in order to sexually abuse her, Plaintiff JANE DOE #43 has experienced
15 feelings of betrayal, humiliation, depression, anxiety, intrusive thoughts along with recurring
16 symptoms of her PTSD which have resulted in physical manifestations of that distress including
17 sleeplessness and lack of focus.
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19 **OO. Specific Factual Allegations - JANE DOE #44**
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21 480. In or around 2002, Plaintiff JANE DOE #44 began seeing BROCK for regular
22 gynecological care at the Cedars clinic on La Cienega Boulevard. Because of Cedars’ standing in the
23 community, Plaintiff believed that she would be receiving expert gynecological care from skilled
24 physicians. BROCK and his partners garnered Plaintiff JANE DOE #44’s trust, which BROCK then
25 took advantage of in order to sexually abuse and harass her and to gratify himself.
26

27 481. Plaintiff JANE DOE #44 saw BROCK through a miscarriage, after which he performed
28 a dilation and curettage. Plaintiff believed she was receiving quality care from a highly skilled

1 obstetrician, and she continued to see BROCK throughout her subsequent pregnancy which resulted in
2 a live birth in October of 2003.

3 482. On two occasions during her prenatal visits in 2003, BROCK offered his hand to her to
4 pull her up to a sitting position after he had finished performing her pelvic examination. As he helped
5 her to a sitting position with one hand, his other ungloved hand was under her vagina, so as she reached
6 that sitting position, his hand was cupping her intimate anatomy. BROCK just left his hand there and
7 did not remove it. Plaintiff JANE DOE #44 was embarrassed on both occasions, that she had sat on
8 his bare hand with her bare vulva, but trusting that he was a reputable gynecologist in a reputable clinic,
9 blamed herself for the intimate contact.
10

11 483. Plaintiff JANE DOE #44 was alone with BROCK in the examining room during both
12 incidents. There was no nurse or chaperone present.
13

14 484. After learning that BROCK was being sued for sexual misconduct involving patients,
15 Plaintiff JANE DOE #44 realized that the manner in which BROCK touched and held her intimate
16 anatomy during these two appointments was done by BROCK intentionally, was not medically
17 acceptable, was not a part of routine medical care, but was done to solely sexually abuse and harass her
18 and to sexually gratify BROCK.
19

20 485. BROCK also performed lengthy vaginal examinations during every one of Plaintiff
21 JANE DOE #44's pre-natal visits. At the time, Plaintiff JANE DOE #44 had no experience with what
22 a pre-natal exam should include, nor how a pre-natal vaginal exam or the checking of her cervix should
23 be performed. Plaintiff now knows that the way the vaginal exams were performed, as well as the
24 frequency of the vaginal exams, were not medically necessary or appropriate and were not a part of
25 legitimate medical care but were done to sexually harass and abuse Plaintiff JANE DOE #44, and to
26 sexually gratify BROCK.
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1 486. Because BROCK took advantage of Plaintiff JANE DOE #44 during these vulnerable
2 exams to abuse her, she has experienced feelings of shame and humiliation for not recognizing
3 BROCK's actions for what they were, and therefore not having spoken out sooner which allowed his
4 sexual abuse to continue and to affect so many other women.

5
6 **PP. Specific Factual Allegations - JANE DOE #45**

7 487. Plaintiff JANE DOE #45 met BROCK when he came into her labor and delivery room
8 in 2007 to deliver her first child. Plaintiff JANE DOE #45 had seen a nurse practitioner throughout
9 her pregnancy, and BROCK was the obstetrician on call at Cedars Hospital when she arrived, in labor,
10 to deliver her baby.

11
12 488. Plaintiff JANE DOE #45 placed her trust and confidence in BROCK believing that the
13 healthcare providers at Cedars, and BROCK, in particular, were trustworthy and skilled. BROCK
14 garnered Plaintiff JANE DOE #45's trust and confidence which he took advantage of in order to
15 sexually abuse and harass her.

16 489. Plaintiff JANE DOE #45 was a teenager when she arrived at Cedars, all alone, to deliver
17 her child. Upon arrival, staff had her change into a gown and hooked her up to monitors. Plaintiff
18 JANE DOE #45 left her bra on underneath the gown. When BROCK came into her room to examine
19 her, he told her that if she was "stupid enough to leave her bra on" that he would "cut it off." He then
20 took surgical scissors and, without her consent, reached underneath her gown and cut her bra off of
21 her. At the time, Plaintiff was embarrassed for not knowing that she was supposed to remove her bra,
22 and she believed that BROCK's actions must have been appropriate.

23
24 490. Throughout her labor, BROCK would come in at various intervals and perform pelvic
25 exams, roughly inserting a few fingers into her under the guise of "checking her dilation." These
26 vaginal "exams" were very painful, and with hindsight, were unnecessarily so and were sexual in
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1 nature. At the time, Plaintiff JANE DOE #45 did not know what to expect (and had never before been
2 examined by a male physician), but she believed that a licensed physician at Cedars would not be
3 involved in anything untoward, and believed that BROCK was performing legitimate and medically
4 necessary examinations.

5
6 491. During one of BROCK's visits to her room he announced that he wanted to see "what
7 her hymen looked like because she was so young." He then "examined" her hymen and told her that
8 it was not fully broken, but that the birth of her baby would "take care of that." While Plaintiff believed
9 that she was receiving high quality care by a skilled obstetrician, she now knows that both the
10 "examination," and BROCK's comments about her hymen were not a part of legitimate medical care
11 but were performed and made to sexually abuse and harass her and to sexually gratify BROCK.
12

13 492. Plaintiff JANE DOE #45 tore vaginally both horizontally and vertically during her
14 delivery. BROCK told her that she would be in pain from this tearing, but that "maybe that would stop
15 her from getting pregnant again." Plaintiff suffered extreme pain and went back to the hospital three
16 days later where she was informed that she had suffered significant tearing and that BROCK had only
17 put sutures into the base of one of the tears. Plaintiff now knows that BROCK's comments in this
18 regard, and his "repair" of her injuries were not a part of legitimate medical care, but were made to
19 humiliate her, to sexually abuse her, and to gratify BROCK.
20

21 493. Only after learning that BROCK was being sued for sexual misconduct involving
22 patients, did Plaintiff JANE DOE #45 come to understand what had been done to her. Plaintiff JANE
23 DOE #45 now understands that BROCK performed his vaginal "examinations" of her in a non-medical
24 manner, to physically intimidate her, to sexually abuse her, and sexually gratify BROCK.
25

26 494. Because BROCK took advantage of Plaintiff JANE DOE #45's vulnerability as a young
27 primigravida to abuse her, Plaintiff JANE DOE #45 has experienced feelings of betrayal, humiliation,
28

1 depression, anxiety, intrusive thoughts and other symptoms of PTSD which have resulted in physical
2 manifestations of that distress including sleeplessness and lack of focus.

3 **QQ. Specific Factual Allegations – JANE DOE #46**

4 495. BROCK delivered Plaintiff JANE DOE #46's baby in 2000 at CEDARS SINAI
5 MEDICAL CENTER. Plaintiff placed her trust and confidence in BROCK, believing that the
6 healthcare providers at Cedars, and BROCK, in particular, were trustworthy and skilled.

7
8 496. Plaintiff JANE DOE#46's husband was with her at all times during her pre-natal
9 appointments with BROCK. During those visits, with her husband in attendance, BROCK garnered
10 Plaintiff JANE DOE #46's trust and confidence which he then took advantage of in order to sexually
11 abuse and harass her.

12
13 497. During her more than 24 hours in labor, there were times when Plaintiff JANE DOE
14 #46's husband was not by her side. During one of these times, when her husband had left the room,
15 BROCK and a younger male, whom he did not introduce, came into her room. BROCK announced
16 that he wanted to take a look at something, and then without warning, consent or explanation, lifted up
17 Plaintiff JANE DOE #46's gown and performed an invasive pelvic "exam." The "examination" itself
18 was unexpected and jarring to Plaintiff JANE DOE #46. BROCK and this other male then told her,
19 "You have a really weird shaped cervix" and left the room.

20
21 498. This comment about her intimate anatomy made Plaintiff feel unsteady and distracted
22 her from what she now understands to have been an inappropriate and non-consensual physical assault.
23 At the time, Plaintiff believed that a licensed physician at Cedars would not have done anything
24 inappropriate, and that the nature of the pelvic exam, as well as BROCK's comments, were legitimate
25 and medically necessary.
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1 499. Immediately after her delivery, while her husband was attending their baby, Plaintiff
2 JANE DOE #46 was again approached by BROCK, who had ostensibly come to stitch her up following
3 the birth. BROCK commented on the fact that she had a bit of tearing from the delivery, and told her
4 not to worry, that he would put a few stitches in her to “make her husband very happy.” Plaintiff was
5 distracted and focused on the health of her newborn, who had been delivered with the cord wrapped
6 around its neck. At the time, Plaintiff continued to trust that she was being provided with high quality
7 care by a skilled obstetrician and gynecologist in a reputable hospital. She now understands the
8 depravity of a physician altering her intimate anatomy to “please a male.”
9

10 500. Upon learning that BROCK was being sued for sexual misconduct involving patients,
11 Plaintiff JANE DOE #46 came to understand what had been done to her. Plaintiff JANE DOE #46
12 now understands that BROCK performed his physical examinations of her in a non-medical manner
13 for no other reason than his own sexual gratification and to sexually harass and abuse her. She now
14 also knows that the way that he stitched her together following her delivery was not medically
15 necessary or appropriate and not a part of legitimate medical care but was in fact sexually abusive to
16 Plaintiff JANE DOE #46 and sexually gratifying to BROCK.
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19 501. Because BROCK took advantage of Plaintiff JANE DOE #46 during and after her
20 delivery, when she was at her most vulnerable, to abuse her, Plaintiff JANE DOE #46 has experienced
21 feelings of betrayal, humiliation, depression, and anxiety, which have resulted in physical
22 manifestations of that distress including sleeplessness and lack of focus.
23

24 **RR. Specific Factual Allegations – JANE DOE #47**

25 502. Plaintiff JANE DOE #47 received gynecological care from BROCK in or about the
26 early 2000’s to approximately 2010 at CEDARS SINAI MEDICAL GROUP. At the time, Plaintiff
27
28

1 considered Cedars to be the premier healthcare facility in Los Angeles and believed she would receive
2 elite, professional care. Instead, she was subjected to repeated sexual abuse by BROCK.

3 503. When Plaintiff began treating with BROCK, she told him she was not (and never had
4 been) sexually active. BROCK began his first exam of Plaintiff JANE DOE #47 by giving her an
5 “anatomy lesson,” which entailed pointing to and touching her clitoris, pointing to and touching her
6 vagina, and explaining the functions of the urethra and clitoris. Throughout the “lesson,” he also
7 identified and touched the areas of her intimate anatomy that would provide sexual stimulation in an
8 effort to “teach” her how to reach orgasm. Plaintiff felt humiliated, but believed BROCK was being
9 thorough and that it was appropriate to explain and provide advice about her sexuality and sexual
10 functioning. She now realizes he took advantage of her trust and inexperience to sexually assault her
11 under the pretext of providing legitimate care.
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14 504. During multiple appointments throughout the 2000’s, BROCK gave Plaintiff JANE
15 DOE #47 rectal exams by inserting multiple fingers into her rectum, without warning or explanation.
16 At times, BROCK would perform the rectal exams and then re-insert his fingers into her vagina,
17 without changing his gloves. On other occasions, BROCK would repeatedly move his fingers from her
18 vagina to her rectum, multiple times, in the pretext of performing a legitimate exam. Following these
19 exams, Plaintiff would develop vaginal infections which she now believes were caused by BROCK’s
20 unsanitary—and sexually motivated—“examination” techniques.
21

22 505. Throughout Plaintiff’s care, BROCK administered multiple breast exams that included
23 groping and jiggling Plaintiff’s JANE DOE #47 breasts and massaging lubricant on Plaintiff’s nipples.
24 At the time, although Plaintiff felt embarrassed by the way BROCK was touching her, she believed he
25 was looking for cancerous lumps or other abnormalities and trusted him.
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1 506. BROCK made multiple comments during Plaintiff's appointments that she now
2 realizes were inappropriate and sexual in nature. For example, while performing vaginal exams, he
3 would tell her she was "so tight," said she had a "firm butt," and asked her if all "brown women [were]
4 shaped the same." On another occasion, he pulled one of her pubic hairs out with his fingers and said,
5 "You can get the rest next time."
6

7 507. During Plaintiff JANE DOE #47's last appointment with BROCK, BROCK suggested
8 that he continue to use a children's speculum to conduct her vaginal exam. Plaintiff agreed, believing
9 that the smaller speculum would cause her to experience less pain. At the last moment, BROCK
10 changed his mind and used a regular speculum in effort to break her hymen (which he did). The
11 procedure caused Plaintiff to experience severe pain and vaginal bleeding. Plaintiff was humiliated and
12 distraught, as she had wanted to save herself for her future husband and felt like BROCK had ruined
13 her body.
14

15 508. Following this appointment, Plaintiff JANE DOE #47 called Cedars to complain that
16 BROCK broke her hymen. The call center transferred her call to "patient services" and the individual
17 with whom she spoke said she did not know what a hymen was but would make a record of the
18 complaint. No one from Cedars ever responded to or followed up with Plaintiff. At the time, Plaintiff
19 was upset because she felt like BROCK damaged her and compromised her virginity. Especially as
20 Cedars failed ever to respond to her complaint, however, she questioned herself and came to believe
21 that, because of her inexperience with gynecologists, she had overreacted or been too sensitive. She
22 now realizes that BROCK's conduct was sexually motivated and lacked medical legitimacy.
23

24 509. Plaintiff JANE DOE #47 only recently discovered that BROCK's behavior lacked
25 medical legitimacy and was in fact sexual assault. As a result, she suffered significant emotional
26 anguish and has been unable to engage in intimate relationships.
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510. The Plaintiffs re-state and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

512. Plaintiffs had a right to be free from gender discrimination, sexual molestation, abuse, and harassment under the Unruh Civil Rights Act.

514. Plaintiffs' civil rights were violated by DEFENDANTS when BROCK repeatedly subjected them to unsafe, sadistic sexual abuse as patients under his care and under the care of DEFENDANTS herein.

515. Furthermore, Plaintiffs' civil rights were violated by CORPORATE DEFENDANTS when, among other things, CORPORATE DEFENDANTS through their agents, actual, apparent, and/or ostensible, servants, and/or employees, intentionally concealed a countless number of complaints and reports of sexual exploitation, sexual abuse, molestation, harassment and reckless medical misconduct being committed by DEFENDANT BROCK.

1 516. DEFENDANTS were acting under the color of their authority and in the scope of their
2 employment when Plaintiffs were sexually exploited and abused by BROCK as patients at
3 DEFENDANTS' medical facilities where BROCK worked and/or maintained hospital or clinical
4 privileges.

5 517. The CORPORATE DEFENDANTS herein denied Plaintiffs full and equal
6 accommodations, advantages, facilities, privileges, and healthcare services because of their identity as
7 females, by allowing BROCK unfettered access to sexually abuse Plaintiffs, by and through his position
8 of trust and authority given to him, and maintained, by the CORPORATE DEFENDANTS. There is
9 no justification or legitimate business reason for allowing such sexually destructive discrimination to
10 stand.

11 518. Further, CORPORATE DEFENDANTS' collective retention of BROCK denied
12 Plaintiffs, and all of their other female patients, full and equal access to safe medical facilities,
13 treatment, and services, based upon their gender. By actively concealing BROCK'S history and
14 reputation as a serial sexual predator, the CORPORATE DEFENDANTS enabled and ratified his
15 misconduct.

16 519. The substantial motivating reason for the CORPORATE DEFENDANTS' misconduct
17 in concealing numerous complaints of BROCK'S sexually abusive nature was, in fact, Plaintiffs'
18 gender as being females. The CORPORATE DEFENDANTS knew that only its female patients would
19 seek gynecological treatment from DEFENDANT BROCK and, thus, would be unwittingly subjected
20 to his sexual assault, battery, and harassment.

21 520. As a direct and proximate result of CORPORATE DEFENDANTS' tortious acts,
22 omissions, wrongful conduct, and breaches of their duties, Plaintiffs have suffered substantial general,
23 special, and consequential damage in an amount to be proven at trial, but in no event less than the
24 minimum jurisdictional amount of this Court.

25 521. As a further direct and proximate result of CORPORATE DEFENDANTS' collective
26 and concerted wrongful actions, as herein alleged, Plaintiffs have suffered, and continue to suffer, great
27 pain of mind and body, shock, emotional distress, certain physical manifestations of emotional distress,
28

embarrassment, loss of self-esteem, disgrace, humiliation, and grief in an amount according to proof at trial but in no event less than the jurisdictional minimum requirements of this Court.

522. As a further direct and proximate result of CORPORATE DEFENDANTS' wrongful actions, as herein stated, Plaintiffs are entitled to damages as set forth in Cal. Civ. Code § 52, including special and general damages to be determined by a jury, and attorneys' fees as may be determined by the Court.

523. The conduct of CORPORATE DEFENDANTS was oppressive, malicious, and despicable in that it was intentional and done in conscious disregard for the rights and safety of others, and was carried out with a conscious disregard of Plaintiffs' right to be free from such tortious behavior, such as to constitute oppression, fraud or malice pursuant to Cal. Civ. Code § 3294, entitling Plaintiffs to punitive damages against CORPORATE DEFENDANTS in the amount appropriate to punish and set an example of each and every DEFENDANT, both individually and in the collective.

SECOND CAUSE OF ACTION
VIOLATION OF THE BANE ACT
Cal. Civ. Code § 52.1
(Against All DEFENDANTS)

524. The Plaintiffs re-state and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

525. CORPORATE DEFENDANTS' actions, as alleged herein, have and will continue to interfere with Plaintiffs' right to be free from gender discrimination in the form of sexual harassment, codified under Cal. Civ. Code § 52.1.

526. BROCK intentionally interfered with Plaintiffs' civil rights to receive safe medical treatment by requiring unfettered access to their bodies, including their most intimate female parts for his sexual gratification, under the guise of medical intervention and treatment in violation of Cal. Civ. Code § 52.1. BROCK'S access to Plaintiffs was achieved through coercion because Plaintiffs were unaware of his sexually motivated contacts; and Plaintiffs relied on BROCK'S good standing with some of the most reputable medical institutions worldwide in seeking gynecological care. BROCK forced Plaintiffs to expose their naked bodies while he engaged in idle conversation, subjected them to

1 repeated unnecessary vaginal, breast, and rectal exams, and met them with the malicious mutilation of
2 their intimate parts after childbirth without consent.

3 527. During Plaintiffs' time as patients of CORPORATE DEFENDANTS, DEFENDANTS
4 engaged in oppressive and unlawful tactics by ignoring, concealing, and ultimately suppressing the
5 Plaintiffs' reports and complaints of being sexually exploited and abused by DEFENDANT BROCK.
6 These intentional acts of concealment by CORPORATE DEFENDANTS, of DEFENDANT
7 BROCK'S exploitative and abusive behavior, violated the Plaintiffs' right to be free from
8 discrimination on the basis of their gender under California State Law.

9 528. Furthermore, Plaintiffs were deprived of Due Process of Law, when various reports and
10 complaints to CORPORATE DEFENDANTS' agents, servants, and employees against DEFENDANT
11 BROCK, failed to trigger any investigations, reports to law enforcement or administrative or
12 governmental agencies such as the California Medical Board or Attorney General's Office, or other
13 actions by CORPORATE DEFENDANTS, who were each required to take action, both under their
14 own policies and procedures, as well as under California State Law mandates. In addition,
15 DEFENDANTS' actions and misconduct were contrary to Plaintiffs' civil rights guaranteed under the
16 Constitution of the State of California.

17 529. CORPORATE DEFENDANTS wrongful conduct described herein was intended to,
18 and did, successfully interfere with Plaintiffs' Constitutional rights to be free from gender
19 discrimination and harassment, as well as interfered with their rights of Due Process under the United
20 States' Constitution, specifically the Fifth and Fourteenth Amendments.

21 530. CORPORATE DEFENDANTS unlawfully and wrongfully used, or employed others to
22 wrongfully use, threats, intimidation, harassment, violence, and coercion over Plaintiffs' persons, to
23 which Plaintiffs, who did not have knowledge that the conduct in which CORPORATE
24 DEFENDANTS were engaging was not medically necessary, had no relief except to submit to the
25 DEFENDANTS' wrongful threats, intimidation, harassment, violence, and coercion, which rendered
26 Plaintiffs' submission involuntary.

27 531. The CORPORATE DEFENDANTS actions and misconduct were the legal and
28 proximate causes of physical, psychological, emotional, and economic damages, and damage to

1 Plaintiffs herein, who have suffered and continue to suffer to this day. The actions and misconduct of
2 CORPORATE DEFENDANTS have also resulted in Plaintiffs incurring, and will require them to incur
3 into the future, expenses for medical and psychological treatment, therapy and counseling.

4 532. In subjecting Plaintiffs to the wrongful treatment described herein, CORPORATE
5 DEFENDANTS acted willfully and maliciously with the intent to harm Plaintiffs, and in conscious
6 disregard of Plaintiffs' rights, entitling Plaintiffs to compensatory damages in a sum to be shown
7 according to proof, emotional distress damages in a sum to be shown according to proof, punitive
8 and/or exemplary damages, attorney's fees, other damages pursuant to Civil Code § 52(b)(1), and a
9 temporary restraining order or a preliminary or permanent injunction ordering CORPORATE
10 DEFENDANTS to refrain from conduct or activities as alleged herein, stating "VIOLATION OF THIS
11 ORDER IS A CRIME PUNISHABLE UNDER SECTION 422.77 OF THE PENAL CODE," and other
12 such relief as the court deems proper.

13 533. In subjecting Plaintiffs to the wrongful treatment herein described, BROCK acted
14 willfully and maliciously with the intent to harm Plaintiffs, and in conscious disregard of Plaintiffs'
15 rights, so as to constitute malice and oppression under California Civil Code § 3294. Plaintiffs are
16 therefore entitled to the recovery of punitive damages against BROCK, in an amount to be determined
17 according to proof.

18
19 **THIRD CAUSE OF ACTION**
20 **GENDER VIOLENCE**
21 **Cal. Civ. Code § 52.4**
22 ***(Against all DEFENDANTS)***

23 534. The Plaintiffs re-state and incorporate by reference herein each and every allegation
24 contained herein above as though fully set forth and brought in this cause of action.

25 535. California Civil Code § 52.4 provides that gender violence is a form of sexual
26 discrimination and includes a "physical intrusion or physical invasion of a sexual nature under coercive
27 conditions. . ." Cal. Civ. Code § 52.4(c)(2). For purposes of this section, "gender" means "sex, and
28 includes a person's gender identity and gender expression." Cal. Civ. Code § 52.4(d); Cal. Civ. Code
§ 51. The provision further provides that any person subjected to gender violence may bring a civil

1 action for damages against any responsible party, and may seek actual, compensatory, and punitive
2 damages therefore, or any other appropriate relief.

3 536. All Plaintiffs herein are female.

4 537. BROCK intentionally and without consent physically intruded and/or invaded
5 Plaintiffs' bodies during medical examinations in a sexual manner in violation of Cal. Civ. Code §
6 52.4. BROCK'S sexual contact was coercive by virtue of Plaintiffs' intensified need to place their trust
7 and confidence in BROCK as a physician held out as specializing in gynecological care within the
8 CORPORATE DEFENDANTS' networks as a premier provider of patient care.

9 538. BROCK'S acts committed against Plaintiffs, as alleged herein, including the sexual
10 assault, harassment, exploitation, abuse and molestation of Plaintiffs, constitutes gender violence and
11 a form of sex discrimination in that one or more of BROCK'S acts would constitute a criminal offense
12 under state law that has as an element the use, attempted use, or threatened use of physical force against
13 the person of another, committed at least in part based on the gender of the victim, whether or not those
14 acts have resulted in criminal complaints, charges, prosecution, or conviction.

15 539. DEFENDANT BROCK carried out such actions and conduct as an employee, agent,
16 and/or representative of CORPORATE DEFENDANTS which provide medical treatment to the public.

17 540. During Plaintiffs' time as patients at CORPORATE DEFENDANTS medical facilities,
18 DEFENDANTS engaged in oppressive and unlawful tactics in sexually abusing and harassing
19 Plaintiffs, as well as actively ignoring, concealing, and suppressing other patients' complaints of being
20 sexually exploited and abused by BROCK. These intentional acts of concealment of BROCK'S abusive
21 behavior violated Plaintiffs' right to be free from discrimination on the basis of sex, under Cal. Civ.
22 Code § 52.1.

23 541. The CORPORATE DEFENDANTS were complicit in the physical intrusion and/or
24 invasion of Plaintiffs' bodies during medical examinations by either (a) failing to intervene or report
25 any misconduct as a staff member, nurse, or chaperone during BROCK'S examinations; and/or (b) by
26 staff members and agents of DEFENDANTS escorting Plaintiffs into an examination room and
27 directing them to remove their clothing, knowing the patterned practice and likelihood that BROCK
28 would assault them in a sexual manner; and/or (c) providing BROCK with facilities and locations to

1 assault Plaintiffs in a sexual manner all the while touting him as an expert in gynecological care.

2 542. CORPORATE DEFENDANTS' above-referenced actions were the legal and proximate
3 causes of physical, psychological, and emotional damage to Plaintiffs, who have suffered and continue
4 to suffer to this day. The actions of CORPORATE DEFENDANTS have also resulted in Plaintiffs
5 incurring, and will require them to incur into the future, expenses for medical and psychological
6 treatment, therapy, and counseling.

7 543. As a result of the above-described conduct, Plaintiffs have suffered and continue to
8 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional
9 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life were
10 prevented and will continue to be prevented from performing daily activities and obtaining the full
11 enjoyment of life; and have incurred and will continue to incur expenses for medical and psychological
12 treatment, therapy, and counseling.

13 544. As more fully set forth above, Plaintiffs were injured as a result of the gender violence
14 outlined above, and seek all remedies provided for in California Civil Code § 52.4, including but not
15 limited to, actual damages, compensatory damages, punitive damages, costs, and attorney's fees.

16 **FOURTH CAUSE OF ACTION**

17 **SEXUAL HARASSMENT**

18 **Cal. Civ. Code § 51.9**

19 ***(Against All DEFENDANTS)***

20 545. The Plaintiffs re-state and incorporate by reference herein each and every allegation
21 contained herein above as though fully set forth and brought in this cause of action.

22 546. During Plaintiffs' time as patients and under the care of CORPORATE DEFENDANTS
23 and BROCK, DEFENDANTS intentionally, recklessly, and wantonly made sexual advances,
24 solicitations, requests, demands for sexual compliance, and/or engaged in other forms of verbal and
25 physical conduct of a sexual nature, while undertaking a pattern of grooming, based on the Plaintiffs'
26 gender, that was unwelcome, pervasive and severe. DEFENDANT BROCK'S misconduct, sexual
27 exploitation, and sexual abuse includes, but is not limited to, BROCK groping and fondling Plaintiffs'
28 breasts and vaginas, making lewd and inappropriate comments, and propositions of a sexual nature, all
under the guise of medical care and treatment, and all with the knowledge – and under the supervision

1 of – CORPORATE DEFENDANTS, all while BROCK was acting as an agent, actual, apparent and/or
2 ostensible agent, servant, representative and/or employee of CORPORATE DEFENDANTS.

3 547. During Plaintiffs’ time as patients in the care of CORPORATE DEFENDANTS,
4 DEFENDANT BROCK intentionally, recklessly, and wantonly committed acts which resulted in
5 harmful and offensive contact with intimate parts of Plaintiffs, including but not limited to, using his
6 position of authority and trust to force Plaintiffs to endure and be subjected to BROCK’S inappropriate
7 sexual touching, objectification, and commentary.

8 548. The incidents of abuse outlined herein took place while Plaintiffs were under the control
9 of BROCK and CORPORATE DEFENDANTS in their capacities and positions as a physician and as
10 a supervisor of physicians, medical professionals, and other staff at CORPORATE DEFENDANTS’
11 premises, and while acting specifically on behalf of CORPORATE DEFENDANTS herein.

12 549. Because of Plaintiffs’ relationships with DEFENDANTS BROCK and CORPORATE
13 DEFENDANTS; BROCK’S status as a prominent, highly compensated gynecologist employed by
14 CORPORATE DEFENDANTS; BROCK’S affiliation with and promotion by one of the most revered
15 medical institutions in the world; and Plaintiffs’ vulnerability as gynecological patients whose
16 pregnancies and births were often categorized as “high risk” thus heightening Plaintiffs’ desperation to
17 trust and rely on BROCK’S expertise, Plaintiffs were thus unable to easily terminate the relationship
18 they had with DEFENDANTS.

19 550. Because of BROCK’S status, position of authority, physical seclusion of Plaintiffs,
20 Plaintiffs’ vulnerability often seeking lifesaving care for their unborn child, Plaintiffs’ mental and
21 emotional state, and the fact that Plaintiffs did not understand that BROCK’S conduct was not
22 medically necessary, Plaintiffs were unable to, did not, and could not give consent to such acts.

23 551. Even though the CORPORATE DEFENDANTS knew or should have known of these
24 pervasive, illegal, and inappropriate activities by BROCK, CEDARS-SINAI nor any of the other
25 CORPORATE DEFENDANTS financially benefitting from BROCK, did anything to investigate,
26 supervise, or monitor BROCK to ensure the safety of the patients in their charge. Nor did
27 CORPORATE DEFENDANTS put in place — or enforce — safeguards to prevent foreseeable harm
28 to female gynecological patients, including imposition of a policy providing for the mandatory presence

1 of an independent and properly trained chaperone, to prevent, deter, and report any misconduct in the
2 context of gynecological examinations and procedures. CORPORATE DEFENDANTS also failed
3 adequately (or at all) to hire appropriate chaperones or train its employees and agents in how to
4 recognize and report any sexual or medical battery or harassment.

5 552. With regard specifically to the liability hereunder of CORPORATE DEFENDANTS, a
6 corporation is a “person” within the meaning of Civil Code § 51.9, which subjects persons to liability
7 for sexual harassment within a business, service, or professional relationship, and such an entity
8 defendant may be held liable under this Statute for the acts of its employees. *See C.R. v. Tenet*
9 *Healthcare Corp.*, 169 Cal.App.4th 1094 (2009). Further, principles of ratification apply when the
10 principal ratifies the agent’s originally unauthorized harassment, as is alleged to have occurred herein.

11 553. CORPORATE DEFENDANTS’ conduct (and the conduct of their agents, servants,
12 and/or employees) was a breach of their duties to Plaintiffs.

13 554. As a result of the above-described conduct, Plaintiffs have suffered and continue to
14 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional
15 distress including embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of
16 life; have suffered and continue to suffer and were prevented and will continue to be prevented from
17 performing daily activities and obtaining the full enjoyment of life; and/or have incurred and will
18 continue to incur expenses for medical and psychological treatment, therapy, and counseling.

19 555. The conduct of BROCK and CORPORATE DEFENDANTS was oppressive,
20 malicious, and despicable in that it was intentional and done in conscious disregard for the rights and
21 safety of others, and was carried out with a conscious disregard of Plaintiffs’ right to be free from such
22 tortious behavior, such as to constitute oppression, fraud or malice pursuant to Cal. Civ. Code § 3294,
23 entitling Plaintiffs to punitive damages against DEFENDANTS in an amount appropriate to punish and
24 set an example of each and every DEFENDANT, both individually and in the collective.

25 **FIFTH CAUSE OF ACTION**
26 **SEXUAL ASSAULT**
27 **(Against All DEFENDANTS)**

28 556. The Plaintiffs re-state and incorporate by reference herein each and every allegation

1 contained herein above as though fully set forth and brought in this cause of action.

2 557. DEFENDANT BROCK, in doing the things herein alleged, including intending to
3 subject Plaintiffs to numerous instances of sexual abuse and molestation during their time in the care
4 of CORPORATE DEFENDANTS and BROCK were intended to cause harmful or offensive contact
5 with Plaintiffs, or intended to put Plaintiffs in imminent apprehension of such contact.

6 558. In doing the things herein alleged, CORPORATE DEFENDANTS put Plaintiffs in
7 imminent apprehension of a harmful or offensive contact by BROCK and actually believed that
8 BROCK had the ability to make harmful or offensive contact with Plaintiffs.

9 559. Plaintiffs did not consent to BROCK'S intended harmful or offensive contact with
10 Plaintiffs.

11 560. In doing the things herein alleged, BROCK violated Plaintiffs' rights, pursuant to Cal.
12 Civ. Code § 43, of protection from bodily restraint or harm, and from personal insult.

13 561. In doing the things herein alleged, BROCK violated his duty, pursuant to Cal. Civ. Code
14 § 1708, to abstain from injuring Plaintiffs or infringing upon their rights.

15 562. As a result of the above-described conduct, Plaintiffs have suffered and continue to suffer
16 great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress
17 including embarrassment, loss of self-esteem, disgrace, humiliations, and loss of enjoyment of life;
18 prevented and will continue to be prevented from performing daily activities and obtaining the full
19 enjoyment of life; and/or have incurred and will continue to incur expenses for medical and
20 psychological treatment, therapy, and counseling.

21 563. Plaintiffs are informed and based thereon state that the conduct of DEFENDANTS was
22 oppressive, malicious, and despicable in that it was intentional and done in conscious disregard for the
23 rights and safety of others, and were carried out with a conscious disregard of their right to be free from
24 such tortious behavior, such as to constitute oppression, fraud, or malice pursuant to Cal. Civ. Code §
25 3294, entitling Plaintiffs to punitive damages against DEFENDANTS in an amount appropriate to
26 punish and set an example of DEFENDANTS.

SIXTH CAUSE OF ACTION
SEXUAL BATTERY
Cal. Civ. Code § 1708.5
(Against All DEFENDANTS)

564. The Plaintiffs re-state and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

565. During the course of treatment of Plaintiffs, BROCK used his powers and abilities as a physician, and his knowledge and background and access to Plaintiffs, to sexually batter Plaintiffs, knowing that they would be vulnerable to this type of sexual battery, including but not limited to being subjected to numerous instances of sexual harassment and abuse by BROCK, which Plaintiffs now understand were designed to sexually stimulate Plaintiffs and gratify himself, without medical justification, all under the supervision of DEFENDANTS, including CORPORATE DEFENDANTS.

566. BROCK acted with intent to cause, and did cause, harmful or offensive contact with an intimate part of Plaintiffs that would offend a reasonable sense of personal dignity.

567. BROCK carried out such actions and misconduct as an agent, actual, apparent and/or ostensible agent, servant, representative and/or employee of CORPORATE DEFENDANTS, which provided medical treatment to the public and the Plaintiffs herein.

568. Plaintiffs did not consent to sexualized touching and sexual contact in the context in which it was perpetrated. Had BROCK not been in a position of power and authority over Plaintiffs, and had Plaintiffs not been treated by DEFENDANTS, they would have never permitted such sexual contact by BROCK.

569. DEFENDANT BROCK'S conduct was within the course and scope of his employment and/or agency relationship with CORPORATE DEFENDANTS – all of whom were on notice of BROCK'S history of misconduct.

570. The CORPORATE DEFENDANTS are vicariously liable for the conduct alleged herein because, even though the CORPORATE DEFENDANTS knew of these pervasive, illegal, and inappropriate activities by BROCK, the CORPORATE DEFENDANTS did nothing to investigate, supervise, or monitor BROCK to ensure the safety of the patients in his charge. Nor did CORPORATE DEFENDANTS put in place — or enforce — safeguards to prevent foreseeable harm to female

1 gynecological patients, including imposition of any policy providing for the mandatory presence of a
2 properly-trained independent chaperone, to prevent, deter, and report any misconduct in the context of
3 gynecological examinations and procedures.

4 571. The CORPORATE DEFENDANTS also failed to adequately (or at all) train its
5 employees and agents in how to recognize and report any sexual or medical battery or harassment.
6 Instead, the CORPORATE DEFENDANTS allowed BROCK to continue to perform gynecological
7 examinations of female patients despite knowledge that he had a history of committing battery, sexual
8 battery, and assault.

9 572. By engaging in the misconduct alleged herein, BROCK used the power and authority
10 conferred upon him by the CORPORATE DEFENDANTS to gain access to patients such as Plaintiffs.
11 It is predictable and foreseeable, given the CORPORATE DEFENDANTS' knowledge of BROCK'S
12 prior misconduct and its negligent supervision of BROCK, and failure to put in place — or enforce —
13 safeguards to prevent foreseeable harm to female gynecological patients, that someone in BROCK'S
14 position would abuse the power and authority CORPORATE DEFENDANTS conferred upon him
15 while engaging in assaultive conduct.

16 573. As a proximate result of the above, Plaintiffs suffered damages as otherwise alleged in
17 this Complaint. As a direct, legal, and proximate result of BROCK'S conduct, Plaintiffs sustained
18 serious and permanent injury – damages in an amount to be shown according to proof and within the
19 jurisdiction of the Court.

20 574. As a direct and proximate result of the conduct of DEFENDANTS, individually, jointly
21 and/or severally, Plaintiff sustained severe emotional distress and physical pain, emotional anguish,
22 fear, anxiety, humiliation, embarrassment, and other physical and emotional injuries, damages (both
23 economic and noneconomic), and permanent disability, in the past, present, and future, for which this
24 claim is made. The injuries suffered by Plaintiffs are substantial, continuing and permanent.

25 575. As a direct result of the sexual exploitation and abuse by BROCK, and CORPORATE
26 DEFENDANTS, Plaintiffs have difficulty in reasonably and/or meaningfully interacting with others,
27 including those in positions of authority over them such as doctors, and in intimate, confidential, and
28 familial relationships, due to the trauma of the sexual abuse inflicted upon them by DEFENDANTS.

1 This inability to interact creates conflict with Plaintiffs' values of trust and confidence in others, has
2 caused Plaintiffs substantial emotional distress, anxiety, nervousness, and fear. As a direct result of
3 the sexual abuse and molestation by BROCK, Plaintiffs suffered immensely, including, but not limited
4 to, encountering issues with a lack of trust, various psychological sequelae, depressive symptoms,
5 anxiety, nervousness, and self-medicating behavior.

6 576. The conduct of BROCK and the CORPORATE DEFENDANTS was oppressive,
7 malicious, and despicable in that it was intentional and done in conscious disregard for the rights and
8 safety of others and was carried out with a conscious disregard of Plaintiffs' right to be free from such
9 tortious behavior, such as to constitute oppression, malice or fraud under Cal. Civ. Code § 3294.
10 Plaintiffs are therefore entitled to the recovery of punitive damages against DEFENDANTS in an
11 amount appropriate to punish and set an example of each and every DEFENDANT, both individually
12 and in the collective.

13
14 **SEVENTH CAUSE OF ACTION**
15 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
(Against All DEFENDANTS)

16 577. The Plaintiffs re-state and incorporate by reference herein each and every allegation
17 contained herein above as though fully set forth and brought in this cause of action.

18 578. DEFENDANTS intentional conduct toward Plaintiffs, as described herein, was
19 outrageous and extreme, particularly as part of a trusted physician-patient relationship.
20 DEFENDANTS' conduct exceeded all bounds of decency.

21 579. A reasonable person would not expect or tolerate the sexual harassment, exploitation,
22 molestation, and abuse of Plaintiffs by BROCK, nor tolerate or expect the CORPORATE
23 DEFENDANTS' knowledge of, and callous indifference to, BROCK'S conduct. Plaintiffs placed great
24 faith, trust, and confidence in DEFENDANTS, which, by virtue of DEFENDANTS' wrongful conduct,
25 has now turned to fear, shame, and humiliation.

26 580. A reasonable person would not expect or tolerate DEFENDANTS', including
27 CEDARS-SINAI, placing BROCK — who was known to DEFENDANTS, to have physically and
28 sexually abused other patients — in a position of care of Plaintiffs, which enabled BROCK to have

1 unfettered access to Plaintiffs allowing him to commit wrongful sexual acts, including the conduct
2 described herein.

3 581. A reasonable person would not expect or tolerate the CORPORATE DEFENDANTS,
4 their agents, servants, and/or employees to be incapable of supervising, preventing, and stopping
5 BROCK from committing wrongful sexual acts with patients, including Plaintiffs, or to be incapable,
6 unwilling, or knowingly fail, to supervise BROCK. A reasonable person would not expect a chaperone,
7 whose presence was supposed to ensure Plaintiffs' safety and comfort, during a gynecological exam to
8 sit by idly and fail to intervene while Plaintiffs were being sexually abused by a physician. Indeed, the
9 presence — at times — of a silent chaperone has now further exacerbated the Plaintiffs' extreme
10 embarrassment and harm as they were subjected to what they now understand to be misconduct amidst
11 a silent audience.

12 582. A reasonable person would expect her physician to behave in accordance with proper
13 medical procedure and standards and not to do anything to intentionally deviate from that, particularly
14 a deviation for the physician's sexual gratification.

15 583. DEFENDANTS' conduct described herein was intentional, malicious, and done for the
16 purpose of causing, or with substantial certainty, that Plaintiffs would suffer humiliation, mental
17 anguish, emotional, and physical distress.

18 584. DEFENDANT BROCK'S conduct was committed within the course and scope of his
19 employment with CORPORATE DEFENDANTS.

20 585. As a result of the above-described conduct, Plaintiffs have suffered and continue to
21 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional
22 distress including embarrassment, loss of self-esteem, disgrace, shame, humiliation, and loss of
23 enjoyment of life; prevented and will continue to be prevented from performing daily activities and
24 obtaining the full enjoyment of life; and have incurred and will continue to incur expenses for medical
25 and psychological treatment, therapy, and counseling.

26 586. In subjecting Plaintiffs to the wrongful treatment described herein, DEFENDANTS
27 acted willfully and maliciously with the intent to harm Plaintiffs, and in conscious disregard of their
28 rights, so as to constitute malice and oppression under California Civil Code § 3294. Plaintiffs are

1 informed, and on that basis assert, that these willful, malicious, and/or oppressive acts, as set forth
2 herein, were ratified by the officers, directors, and/or managing agents of the DEFENDANTS.
3 Plaintiffs are therefore entitled to recover punitive damages, in an amount to be determined by the
4 court, against DEFENDANTS.

5
6 **EIGHTH CAUSE OF ACTION**

7 **NEGLIGENCE**

8 **Code of Civ. Proc. § 1714**

9 ***(Against CORPORATE DEFENDANTS and DOES 1 through 100)***

10 587. The Plaintiffs re-state and incorporate by reference herein each and every allegation
11 contained herein above as though fully set forth and brought in this cause of action.

12 588. The CORPORATE DEFENDANTS committed the negligent acts and/or negligent
13 failures to act, as set forth above, and those acts caused the emotional and physical harm endured by
14 Plaintiffs.

15 589. From approximately 1981 through 2024, BROCK was an agent, actual, apparent, and/or
16 ostensible agent, servant, representative and/or employee of CORPORATE DEFENDANTS, providing
17 medical treatment and services through CORPORATE DEFENDANTS' healthcare system. Prior to
18 and after the first incident of BROCK'S sexual harassment, molestation, and abuse of Plaintiffs,
19 through the present, CORPORATE DEFENDANTS knew and/or should have known that BROCK had
20 and was capable of sexually, physically, and mentally exploiting, abusing and harassing Plaintiffs or
21 other victims.

22 590. The CORPORATE DEFENDANTS each had special duties to protect the Plaintiffs,
23 when such individuals were patients, entrusted to CORPORATE DEFENDANTS' care. Plaintiffs care
24 and health were entrusted to DEFENDANTS. DEFENDANTS voluntarily accepted the entrusted care
25 of Plaintiffs. As such, DEFENDANTS owed Plaintiffs a special duty of care that medical professionals
26 dealing with vulnerable medical patients owe to protect them from harm. The duty to protect and warn
27 arose from the special, trusting, confidential, and fiduciary relationship between DEFENDANTS and
28 Plaintiffs.

591. The CORPORATE DEFENDANTS breached their duty of care to Plaintiffs by allowing

1 BROCK to come into contact with Plaintiffs without effective supervision; by failing to adequately
2 hire, supervise, and retain BROCK, whom they permitted and enabled to have access to Plaintiffs; by
3 concealing from Plaintiffs, the public, and law enforcement that BROCK was sexually harassing,
4 molesting, and abusing patients; by holding BROCK out to Plaintiffs as being of high moral and ethical
5 repute, in good standing and trustworthy; and by failing to report BROCK'S misconduct to the
6 California Medical Board.

7 592. The CORPORATE DEFENDANTS further breached their duties to Plaintiffs by failing
8 to investigate or otherwise confirm or deny such facts of sexual exploitation and abuse by BROCK,
9 failing to reveal facts to Plaintiffs, the community and law enforcement agencies, and by placing
10 BROCK into a position of trust and authority, holding him out to Plaintiffs and the public as being in
11 good standing and trustworthy.

12 593. The CORPORATE DEFENDANTS breached their duties to Plaintiffs by failing to
13 adequately monitor and supervise DEFENDANT BROCK and failing to prevent DEFENDANT
14 BROCK from committing wrongful sexual acts with medical patients, including Plaintiffs.

15 594. The CORPORATE DEFENDANTS past records of sexual misconduct by BROCK
16 caused CORPORATE DEFENDANTS to know, or gave them information where they should have
17 known, of BROCK'S incapacity to serve as a physician – especially an obstetrician/gynecologist –
18 providing for the safe care of female patients.

19 595. The CORPORATE DEFENDANTS further breached their duties to Plaintiffs by failing
20 to have adequate policies and procedures in place so as to prevent the abuse of Plaintiffs.

21 596. As a direct and proximate result of the conduct of CORPORATE DEFENDANTS,
22 individually, jointly, and/or severally, Plaintiffs have suffered and continue to suffer great pain of mind
23 and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss
24 of self-esteem, disgrace, humiliation, and loss of enjoyment of life; were prevented and will continue
25 to be prevented from performing daily activities and obtaining the full enjoyment of life; and have
26 incurred and will continue to incur expenses for medical and psychological treatment, therapy, and
27 counseling.

28 597. In subjecting Plaintiffs to the wrongful treatment described herein, CORPORATE

1 DEFENDANTS acted willfully and maliciously with the intent to harm Plaintiffs, and in conscious
2 disregard of their rights, so as to constitute malice and oppression under California Civil Code § 3294.
3 Plaintiffs are informed, and on that basis assert, that these willful, malicious, and/or oppressive acts, as
4 set forth herein, were ratified by the officers, directors, and/or managing agents of the CORPORATE
5 DEFENDANTS. Plaintiffs are therefore entitled to recover punitive damages, in an amount to be
6 determined by the court against CORPORATE DEFENDANTS.

7
8 **NINTH CAUSE OF ACTION**
9 **GROSS NEGLIGENCE and/or WANTON and RECKLESS CONDUCT**
10 ***(Against All DEFENDANTS)***

11 598. The Plaintiffs re-state and incorporate by reference herein each and every allegation
12 contained herein above as though fully set forth and brought in this cause of action.

13 599. The CORPORATE DEFENDANTS owed Plaintiffs a duty to use due care to ensure
14 their safety and freedom from sexual assault, harassment, exploitation, abuse, and molestation while
15 interacting with their employees, representatives, and/or agents, including BROCK.

16 600. DEFENDANT BROCK owed Plaintiffs a duty of due care in carrying out his duties in
17 a reasonable safe manner as an agent, actual, apparent and/or ostensible agent, servant, representative
18 and/or employee of CORPORATE DEFENDANTS.

19 601. By seeking medical treatment from BROCK in the course of his employment, agency,
20 and/or representation of CORPORATE DEFENDANTS, a special, confidential, and fiduciary
21 relationship between Plaintiffs and DEFENDANTS was created, resulting in DEFENDANTS
22 individually, and collectively, owing Plaintiffs a duty to use due care.

23 602. The CORPORATE DEFENDANTS' failure to adequately supervise DEFENDANT
24 BROCK – especially once they knew or should have known of complaints regarding his nonconsensual
25 sexual touching, harassment, boundary violations, and assaults during his treatment of patients – was
26 so reckless as to demonstrate a substantial lack of concern for whether an injury would result to
27 Plaintiffs.

28 603. DEFENDANT BROCK'S conduct in sexually assaulting, harassing, abusing, and
violating Plaintiffs in the course of his employment, agency, and/or representation of CORPORATE

1 DEFENDANTS and under the guise of rendering medical care was so reckless as to demonstrate a
2 substantial lack of concern for whether an injury would result to Plaintiffs.

3 604. The DEFENDANTS' conduct demonstrated a willful disregard for precautions to
4 ensure Plaintiffs' safety.

5 605. The DEFENDANTS' conduct demonstrated a willful disregard for Plaintiffs' rights.

6 606. The DEFENDANTS breached duties owed to Plaintiffs and were grossly negligent
7 when they conducted themselves by the actions described above, said acts having been committed with
8 reckless disregard for Plaintiffs' health, safety, Constitutional, and/or statutory rights, and with a
9 substantial lack of concern as to whether an injury would result.

10 607. As a result of DEFENDANTS' conduct, Plaintiffs sustained severe emotional distress and
11 physical pain, emotional anguish, fear, anxiety, humiliation, embarrassment, and other physical and
12 emotional injuries, and damages (both economic and noneconomic), in the past, present and future, for
13 which this claim is made. The injuries suffered by Plaintiffs are substantial, continuing, and permanent.

14 608. The DEFENDANTS' conduct as described herein was grossly negligent and/or wanton
15 and reckless because it was despicable and was committed maliciously, fraudulently, and/or
16 oppressively with the wrongful intention of injuring Plaintiffs and with a willful and conscious
17 disregard of Plaintiffs' rights, justifying an award of punitive damages against all DEFENDANTS.

18 **TENTH CAUSE OF ACTION**
19 **NEGLIGENT SUPERVISION, HIRING, TRAINING AND RETENTION**
20 ***(Against CORPORATE DEFENDANTS and DOES 1 through 100)***

21 609. The Plaintiffs re-state and incorporate by reference herein each and every allegation
22 contained herein above as though fully set forth and brought in this cause of action.

23 610. By virtue of Plaintiffs' special relationship with CORPORATE DEFENDANTS as
24 patients, and their relationship with BROCK, DEFENDANTS owed Plaintiffs a duty to provide
25 reasonable supervision of BROCK, to use reasonable care in investigating BROCK'S background,
26 actions and serial misconduct, and to provide adequate warning to Plaintiffs and other female patients
27 of BROCK'S dangerous propensities and unfitness.

28 611. As organizations and individuals responsible for, and entrusted with, the welfare of

1 female gynecological and obstetric patients, CORPORATE DEFENDANTS had a duty to protect
2 supervise, and monitor Plaintiffs from being preyed upon by sexual predators, and to supervise and
3 monitor BROCK such that he would not be placed in seclusion with vulnerable medical patients,
4 including the Plaintiffs.

5 612. DEFENDANTS expressly and implicitly represented that BROCK was a legitimate
6 gynecologist, and not a sexual threat to his female patients.

7 613. CORPORATE DEFENDANTS knew or reasonably should have known of BROCK'S
8 lengthy pattern of engaging in sexual abuse and harassment, that BROCK had committed, had engaged
9 in sexual abuse and harassment of patient victims before Plaintiffs, and that he was capable of
10 committing such offenses against Plaintiffs and other female patients.

11 614. CORPORATE DEFENDANTS failed to properly observe, supervise, and monitor
12 BROCK where it was known, knowable, and/or foreseeable that female patients were invited onto the
13 premises owned, operated, controlled, and/or managed by any of the CORPORATE DEFENDANTS
14 could be victims of BROCK'S sexual abuse without proper supervision.

15 615. At no time during the periods of time alleged herein did CORPORATE DEFENDANTS
16 have in place a reasonable system or procedure to investigate, supervise, and monitor its physicians
17 and healthcare personnel, including BROCK, to prevent sexual harassment, sexual exploitation,
18 molestation, and abuse of patients, nor did they implement a system or procedure to oversee or monitor
19 conduct toward patients and others in their care.

20 616. CORPORATE DEFENDANTS were aware, or should have been aware, and understood
21 how vulnerable gynecological patients were to sexual harassment, sexual exploitation, molestation, and
22 abuse by physicians and other persons of authority within the control and supervision of CORPORATE
23 DEFENDANTS. CORPORATE DEFENDANTS should have, but did not, put in place appropriate
24 safeguards to prevent foreseeable harm to female gynecological patients, including imposition of a
25 policy providing for the mandatory presence of an independent, properly trained chaperone to prevent,
26 deter, and report any misconduct in the context of gynecological examinations and procedures.
27 CORPORATE DEFENDANTS also failed to adequately train (or not train at all) its employees and
28 agents in how to recognize and report any sexual or medical battery or harassment.

1 617. CORPORATE DEFENDANTS knew and/or should have known that BROCK had
2 previously engaged, and continued to engage, in unlawful sexual conduct with female patients, and that
3 it was foreseeable, or should have been foreseeable, that BROCK was engaging in, or would engage
4 in, misconduct directed towards Plaintiffs and others, under the protection of the authority, confidence,
5 and trust bestowed upon him through CORPORATE DEFENDANTS, their agents, servants, and
6 employees.

7 618. Despite the fact that CORPORATE DEFENDANTS knew, or should have known, of
8 these sexually exploitive activities being perpetrated by BROCK, the CORPORATE DEFENDANTS
9 herein, failed to use reasonable care in investigating BROCK and did nothing to reasonably investigate,
10 supervise, monitor, or terminate BROCK to ensure the safety of their patients.

11 619. The CORPORATE DEFENDANTS conduct was a breach of their duties to Plaintiffs.

12 620. The CORPORATE DEFENDANTS, their agents, servants, and/or employees knew
13 BROCK was sexually exploiting, abusing, and harassing female patients and refused to take any action
14 to stop him. Moreover, the CORPORATE DEFENDANTS, their agents, servants, and/or employees
15 concealed information allowing BROCK to continue working for CORPORATE DEFENDANTS'
16 clinics and facilities. Despite knowledge of BROCK's sexual misconduct, no disciplinary action was
17 taken by CORPORATE DEFENDANTS allowing BROCK'S continued unfettered access and ability
18 to interact with patients, including Plaintiffs. CORPORATE DEFENDANTS and their agents, servants,
19 and/or employees are thus responsible for BROCK'S acts of sexual exploitation, sexual assault, battery,
20 and harassment.

21 621. As a result of the above-described conduct, Plaintiffs have suffered and continue to
22 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional
23 distress including embarrassment, loss of self-esteem, disgrace, shame, humiliation, and loss of
24 enjoyment of life; were prevented and will continue to be prevented from performing daily activities
25 and obtaining the full enjoyment of life; and have incurred and will continue to incur expenses for
26 medical and psychological treatment, therapy, and counseling.

ELEVENTH CAUSE OF ACTION
NEGLIGENT FAILURE TO WARN
(Against CORPORATE DEFENDANTS and DOES 1 through 100)

622. The Plaintiffs re-state and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

623. The CORPORATE DEFENDANTS owed Plaintiffs a duty to take reasonable protective measures to protect Plaintiffs and other unsuspecting patients from the risk of sexual harassment, molestation, exploitation and abuse by BROCK by properly warning, training, or educating the Plaintiffs about how to avoid such a risk.

624. The CORPORATE DEFENDANTS breached their duty to take reasonable protective measures to protect Plaintiffs and other patients from the risk of sexual exploitation, harassment, molestation and abuse by BROCK, such as the failure to properly warn, train, or educate Plaintiffs and other patients about how to avoid the particular risk of sexual misconduct that BROCK posed.

625. The CORPORATE DEFENDANTS breached their duty to take reasonable protective measures to protect the Plaintiffs and other patients from the risk of sexual assault, harassment, exploitation, abuse, and molestation by BROCK, by failing to supervise and stop employees of CORPORATE DEFENDANTS, including BROCK, from committing wrongful sexual acts with patients including Plaintiffs.

626. As a result of the above-described conduct, Plaintiffs have suffered, and continue to suffer, severe emotional distress and physical pain, emotional anguish, fear, anxiety, humiliation, embarrassment, and other physical and emotional injuries, damages (both economic and non-economic), and permanent disability, in the past, present, and future, for which this claim is made. The injuries suffered by Plaintiffs are substantial, continuing, and permanent.

TWELFTH CAUSE OF ACTION
INVASION OF PRIVACY
(Against All DEFENDANTS)

627. The Plaintiffs re-state and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

628. As medical patients seeking obstetrics and/or gynecological treatment CORPORATE

1 DEFENDANTS' medical facilities, Plaintiffs had a reasonable expectation of privacy in such
2 treatment. Indeed, all Californians enjoy a right to privacy, including medical privacy, under the
3 California Constitution, Article 1, Section 1.

4 629. Plaintiffs state that BROCK intruded upon Plaintiffs' solitude, seclusion, or private
5 affairs and concerns by sexually exploiting and abusing Plaintiffs during obstetric and/or gynecologic
6 and/or other examinations, treatment, care, and or Plaintiffs' bodies, without authorization or consent
7 under the guise that said exploitation and abuse was a form of legitimate medical care and treatment
8 and/or was medically necessary. This intrusion is highly offensive to reasonable individuals, such as
9 Plaintiffs, and was totally unwarranted and unjustified, constituting invasion of privacy and a violation
10 of the Health Insurance Portability and Accountability Act (HIPAA) under California State Law.

11 630. DEFENDANT BROCK carried out such acts and misconduct as an agent, actual,
12 apparent and/or ostensible agent, servant, representative and/or employee of CORPORATE
13 DEFENDANTS, which provide medical treatment to patients and to the public, including the Plaintiffs.

14 631. The CORPORATE DEFENDANTS are vicariously liable for DEFENDANT
15 BROCK'S misconduct.

16 632. As a result of the above-described conduct of DEFENDANTS, individually, jointly,
17 and/or severally, Plaintiffs have suffered, and continue to suffer, severe emotional distress and physical
18 pain, emotional anguish, fear, anxiety, humiliation, embarrassment, and other physical and emotional
19 injuries, damages (both economic and non-economic), and permanent disability, in the past, present,
20 and future, for which this claim is made. The injuries suffered by Plaintiffs are substantial, continuing,
21 and permanent.

22 633. The DEFENDANTS' conduct as described herein was grossly negligent and/or wanton
23 and reckless because it was despicable and was committed maliciously, fraudulently, and/or
24 oppressively with the wrongful intention of injuring Plaintiffs and with a willful and conscious
25 disregard of Plaintiffs' rights, justifying an award of punitive damages against DEFENDANTS.
26
27
28

THIRTEENTH CAUSE OF ACTION
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
(Against CORPORATE DEFENDANTS and DOES 1 through 100)

634. The Plaintiffs re-state and incorporate by reference herein each and every allegation contained herein above as though fully set forth and brought in this cause of action.

635. A reasonable person would not expect or tolerate the sexual harassment, exploitation, molestation, and abuse by BROCK, nor tolerate or expect CORPORATE DEFENDANTS knowledge of, and callous indifference, to the abuse. Plaintiffs had great faith, trust, and confidence in DEFENDANTS, which by virtue of DEFENDANTS' wrongful conduct, turned to fear, shame, and humiliation.

636. A reasonable person would not expect CORPORATE DEFENDANTS placing BROCK – who was known by CORPORATE DEFENDANTS to have physically and sexually abused other patients – in a position of care of Plaintiffs, which enabled BROCK'S unfettered access to Plaintiffs to commit wrongful sexual acts, including the conduct described herein.

637. A reasonable person would not expect or tolerate CORPORATE DEFENDANTS, their agents, servants and/or employees to be unwilling or incapable of supervising, preventing, and/or stopping BROCK from committing wrongful sexual acts with patients, including Plaintiffs.

638. DEFENDANTS' special relationship with Plaintiffs arises out of Plaintiff's dependency upon them and BROCK by virtue of their position as a physician and medical providers sharing in the obligation to do no harm and provide care to Plaintiffs. More importantly, DEFENDANTS had a duty to take reasonable measures to prevent harm to Plaintiffs and to protect them from BROCK.

639. There was an increased likelihood of risk that DEFENDANTS' negligent actions and inactions would cause serious emotional distress to Plaintiffs given the delicate nature of Plaintiffs' dependency on BROCK for his expertise in high-risk pregnancies and others creating a heightened sense of vulnerability in his patients, including Plaintiffs. As a result of the CORPORATE DEFENDANTS' failure to take reasonable steps to institute safeguards to prevent sexual abuse and harassment, Plaintiffs' suffered irreparable harm.

640. The CORPORATE DEFENDANTS' negligence was a substantial factor in causing Plaintiffs' serious emotional distress.

1 641. As a result of the above-described conduct, Plaintiffs have suffered and continue to
2 suffer great pain of mind and body, shock, emotional distress, physical manifestations of emotional
3 distress including embarrassment, loss of self-esteem, disgrace, shame, humiliation, and loss of
4 enjoyment of life; prevented and will continue to be prevented from performing daily activities and
5 obtaining the full enjoyment of life; and have incurred and will continue to incur expenses for medical
6 and psychological treatment, therapy, and counseling.

7
8 **FOURTEENTH CAUSE OF ACTION**
9 **UNFAIR BUSINESS PRACTICES,**
10 **California Business & Professions Code § 17200**
11 ***(Against All DEFENDANTS)***

12 642. The Plaintiffs re-state and incorporate by reference herein each and every allegation
13 contained herein above as though fully set forth and brought in this cause of action.

14 643. Plaintiffs are informed and believe, and on that basis allege, that DEFENDANT
15 BROCK has engaged in unlawful, unfair, and/or deceptive business practices, including by engaging
16 in in repeated sexual abuse and harassment of patients, including Plaintiffs. Further, by failing to take
17 all reasonable steps to prevent such sexual abuse and harassment from occurring, DEFENDANTS,
18 including CEDARS, engaged in unlawful, unfair, and/or deceptive business practices, including the
19 unlawful, unfair, and/or deceptive business practices also included failing to adequately and promptly
20 investigate, vet, and evaluate individuals for employment, as well as refusing to design, implement,
21 and oversee appropriate policies regarding sexual harassment and abuse of patients in a reasonable
22 manner, as is customary in similar healthcare environments. Further, Plaintiffs are informed and
23 believe, and on that basis allege, that DEFENDANTS engaged in unlawful, unfair, and/or deceptive
24 business practices by concealing the aforementioned sexual harassment, abuse, and/or molestation in
25 order to retain patients who were not apprised of such misconduct.

26 644. Plaintiffs are informed and believe, and on that basis allege, that DEFENDANTS
27 engaged in a common scheme, arrangement, or plan to actively conceal allegations against BROCK so
28 that DEFENDANTS could maintain their public image, be insulated from public scrutiny and
embarrassment, and otherwise avoid the detection of such abuse, all in an effort to project a false sense

1 of safety and security for patients and benefit financially.

2 645. By engaging in the unlawful, unfair, and/or deceptive business practices described
3 above, DEFENDANTS benefitted financially to the detriment of competitors and the public.

4 646. Unless restrained, DEFENDANTS will continue to engage in the unlawful, unfair,
5 and/or deceptive business practices described above, resulting in irreparable harm to Plaintiffs and the
6 public.

7 647. Plaintiffs seek restitution of all amounts improperly obtained by DEFENDANTS
8 through the use of the above-described unlawful, unfair, and/or deceptive business practices, as well
9 as disgorgement of any ill-gotten gains on behalf of Plaintiffs and all others similarly situated.

10 648. Pursuant to Section 17203 of the California Business & Professions Code and available
11 equitable powers of the Court, Plaintiffs are entitled to and seek an injunction enjoining
12 DEFENDANTS from continuing their unlawful, unfair, and/or deceptive business practices. Further,
13 Plaintiffs are entitled to recover reasonable attorneys' fees pursuant to the California Business &
14 Professions Code and California Code of Civil Procedure § 1021.5.

15
16 **FIFTEENTH CAUSE OF ACTION**
17 **CONSTRUCTIVE FRAUD**
18 ***(Against All DEFENDANTS)***

19 649. The Plaintiffs re-state and incorporate by reference herein each and every allegation
20 contained herein above as though fully set forth and brought in this cause of action.

21 650. By holding BROCK out as an agent and trusted employee of CORPORATE
22 DEFENDANTS, and by allowing BROCK to undertake the medical care of female patients such as
23 Plaintiffs, DEFENDANTS entered into a confidential, fiduciary, and special relationship with
24 Plaintiffs.

25 651. The CORPORATE DEFENDANTS breached their confidential, fiduciary duty and
26 special duties to Plaintiffs by the wrongful and negligent conduct described above and incorporated into
27 this cause of action, and in so doing, gained an advantage over Plaintiffs in matters relating to Plaintiffs'
28 safety, security, and health. In breaching such duties as set-forth herein, CORPORATE DEFENDANTS

1 were able to sustain their status as institutions of high moral reput, and preserve their reputations, all at the
2 expense of Plaintiffs' further injuries, and in violation of CORPORATE DEFENDANTS' mandatory
3 duties.

4 652. By virtue of their confidential, fiduciary and special relationship with Plaintiffs,
5 DEFENDANTS owed Plaintiffs a duty to:

- 6 a. Investigate or otherwise confirm or deny such claims of sexual abuse;
- 7 b. Reveal such facts to Plaintiffs, the community at large, and law enforcement agencies;
- 8 c. Refuse to place BROCK and other molesters in positions of trust and authority within
9 CORPORATE DEFENDANTS' institutions;
- 10 d. Refuse to hold out BROCK and other molesters to the public, the community, and law
11 enforcement agencies as being in good standing and, trustworthy in keeping with him and his position
12 as a physician, faculty member and authority figure;
- 13 e. Refuse to assign BROCK and other molesters, sexual predator, and abusers to positions
14 of power within CORPORATE DEFENDANTS medical facilities, and;
- 15 f. Disclose to Plaintiffs, the public, the community, and law enforcement agencies the
16 wrongful, tortious, and sexually exploitive acts that BROCK has engaged in with patients.
17

18 653. The CORPORATE DEFENDANTS' breach of its respective duties included:

- 19 a. Not making reasonable investigations of BROCK;
- 20 b. Issuing no warnings about BROCK;
- 21 c. Permitting BROCK to routinely be supervised only by untrained chaperones, who were
22 consistently derelict in their duty to report BROCK's sexual abuse to law enforcement;
23
- 24 d. Not adopting a policy to prevent BROCK from routinely having patients in his
25 unsupervised control;
- 26 e. Making no reports of any complaints or reports of BROCK'S abuse of patients prior to
27 or during his employment and/or agency at CORPORATE DEFENDANTS and;
28

1 f. Assigning and continuing to assign BROCK to duties which placed him in positions of
2 authority and trust over other patients, positions in which BROCK could easily isolate and sexually
3 exploit and abuse other patients.

4
5 654. At the time that CORPORATE DEFENDANTS engaged in such suppression and
6 concealment of acts, such acts were done for the purpose of causing Plaintiffs to forbear on their rights.

7 655. The DEFENDANTS' misconduct did reasonably cause Plaintiffs to forbear on
8 Plaintiffs' rights.

9 656. The misrepresentations, suppressions and concealment of facts by CORPORATE
10 DEFENDANTS were intended to and were likely to mislead Plaintiffs and others to believe that
11 DEFENDANTS had no knowledge of any complaints against BROCK, or that there were no other
12 complaints of unlawful or sexual misconduct against BROCK and that there was no need for them to
13 take further action or precaution.

14 657. The misrepresentations, suppressions and concealment of facts by CORPORATE
15 DEFENDANTS were likely to mislead Plaintiffs and others to believe that DEFENDANTS had no
16 knowledge of the fact that BROCK was a molester and was known to commit wrongful sexual acts
17 with patients, including Plaintiffs.

18 658. The CORPORATE DEFENDANTS knew or should have known at the time they
19 suppressed and concealed the true facts regarding others' sexual molestations, that the resulting
20 impressions were misleading.

21 659. The CORPORATE DEFENDANTS suppressed and concealed the true facts regarding
22 BROCK with the purpose of: preventing Plaintiffs and others, from learning that BROCK and others
23 had been, and were continuing to sexually harass, molest and abuse patients, under the guise of medical
24 care.

25 660. At all times mentioned herein, CORPORATE DEFENDANTS, with knowledge of the
26 tortious nature of their own and BROCK'S conduct, knowingly conspired and gave each other
27 substantial assistance to perpetrate the misrepresentations, fraud and deceit set-forth herein—covering
28 up the past allegations of sexual misconduct lodged against BROCK, and allowing BROCK to remain

1 in his position as a physician, faculty member and doctor, so they could maintain their reputations and
2 continue with their positions within their networks and medical facilities.

3 661. Plaintiffs and others were misled by CORPORATE DEFENDANTS' suppressions and
4 concealment of facts, and in reliance thereon, were induced to act or induced not to act, exactly as
5 intended by DEFENDANTS. Had Plaintiffs, and others, known the true facts about BROCK, they
6 would not have continued to see BROCK.

7 662. By granting, maintaining, and renewing DEFENDANT BROCK'S position of
8 physician, attending, and/or staff member, and continuing to utilize and employ BROCK for a period
9 in excess of forty-years, CORPORATE DEFENDANTS impliedly and/or expressly represented that
10 BROCK was safe, and morally fit, and competent to render medical care and treatment, and provide
11 obstetrical and gynecological care to female patients.

12 663. When CORPORATE DEFENDANTS made these affirmative or implied
13 representations, and nondisclosures of material facts, DEFENDANTS knew or should have known that
14 the facts were otherwise. CORPORATE DEFENDANTS knowingly and intentionally suppressed the
15 material facts that BROCK, had on numerous, prior occasions sexually, physically, and mentally
16 abused patients of CORPORATE DEFENDANTS, including Plaintiffs, and knew of or learned of
17 conduct, or should have known of conduct by BROCK which placed CORPORATE DEFENDANTS
18 on notice that BROCK had previously been suspected of felonies, including unlawful sexual conduct
19 with patients, and was likely sexually abusing patients in his care.

20 664. The CORPORATE DEFENDANTS had a duty to obtain and disclose information
21 relating to sexual misconduct of BROCK. DEFENDANTS misrepresented, concealed or failed to
22 disclose information relating to sexual misconduct of BROCK.

23 665. The CORPORATE DEFENDANTS knew that they had misrepresented, concealed or
24 failed to disclose information related to sexual misconduct of BROCK.

25 666. Plaintiffs justifiably relied upon DEFENDANTS for information relating to sexual
26 misconduct of BROCK.

27 667. The DEFENDANTS in concert with each other and with the intent to conceal and
28 defraud, conspired and came to a meeting of the minds whereby they would misrepresent, conceal or

1 fail to disclose information relating to the sexual misconduct of BROCK, the inability of CORPORATE
2 DEFENDANTS to supervise or stop BROCK from sexually harassing, molesting and abusing
3 Plaintiffs, and their own failure to properly investigate, supervise and monitor BROCK'S misconduct
4 with patients.

5 668. As a result of the above-described conduct, Plaintiffs have suffered and continue to suffer
6 great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress
7 including embarrassment, loss of self-esteem, shame, disgrace, humiliations, and loss of enjoyment of
8 life; have suffered and continue to suffer and were prevented and will continue to be prevented from
9 performing daily activities and obtaining the full enjoyment of life; will sustain loss of earnings and
10 earning capacity, and/or have incurred and will continue to incur expenses for medical and psychological
11 treatment, therapy, and counseling.

12 669. In subjecting Plaintiffs to the misconduct herein described, DEFENDANTS acted
13 willfully and maliciously with the intent to harm Plaintiffs, and in conscious disregard of Plaintiffs'
14 rights, so as to constitute malice and/or oppression under Cal. Civ. Code § 3294. Plaintiffs are informed,
15 and on that basis state, that these willful, malicious, and/or oppressive acts, as set-forth herein, were
16 ratified by the officers, directors, and/or managing agents of CORPORATE DEFENDANTS, Plaintiffs
17 are therefore entitled to recover punitive damages, in an amount to be determined by the court, against
18 DEFENDANTS, and each of them.

19
20 **PRAYER FOR RELIEF**

21
22 **WHEREFORE**, Plaintiffs pray for a jury trial and for judgment against DEFENDANTS as
23 follows:

24 **FOR ALL CAUSES OF ACTION**

- 25
26 1. For compensatory damages, in an amount to be determined at trial;
27 2. For costs of suit;
28

- 1 3. For any appropriate statutory damages;
- 2 4. For punitive damages, according to proof;
- 3 5. For interest based on damages, as well as pre-judgment and post-judgment interest as
- 4 allowed by law;
- 5 6. For attorney's fees pursuant to California Code of Civil Procedure §§ 1021.5, et seq.,
- 6 52, et seq., 51, et seq., or as otherwise allowable by law;
- 7 7. For interest based on damages, as well as pre-judgment and post-judgment interest as
- 8 allowed by law;
- 9 8. For declaratory and injunctive relief, including but not limited to court supervision of
- 10 DEFENDANTS;
- 11 9. For restitution and disgorgement; and
- 12 10. For any other and further relief the Court may deem proper.
- 13
- 14
- 15


16 **JURY DEMAND**

17 Plaintiffs demand a jury trial on all issues so triable.

18

19 McGRATH KAVINOKY, LLP

20

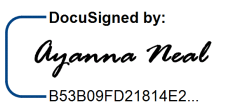
21 By: 

22 Jennifer J. McGrath

23 Darren T. Kavinsky

24 Attorney for Plaintiffs

25 GREWAL LAW, PLLC

26 By: 

27 Ayanna D. Neal (*Requesting to be*

28 *admitted Pro Hac Vice*)

 Attorney for Plaintiffs

 Grewal Law PLLC