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

JANE DOE #11
JANE DOE #32
JANE DOE #48
JANE DOE #49
JANE DOE #50
JANE DOE #51
JANE DOE #52
JANE DOE #53
JANE DOE #54
JANE DOE #55
JANE DOE #56
JANE DOE #57
JANE DOE #58
JANE DOE #59
JANE DOE #60
JANE DOE #61

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;
and BARRY J. BROCK, M.D.,
INC., a California Corporation; Does
1 through 100,

Defendants.

Case No: 25STCV24409

COMPLAINT FOR DAMAGES:

1. VIOLATION OF UNRUH ACT
(Civil Code § 51)
2. VIOLATION OF BANE ACT
(Civil Code § 52.1)
3. GENDER VIOLENCE (Civil
Code § 52.4)
4. SEXUAL HARASSMENT (Civil
Code § 51.9)
5. SEXUAL ASSAULT
6. SEXUAL BATTERY (Civil
Code § 1708.5)
7. INTENTIONAL INFLICTION
OF EMOTIONAL DISTRESS
8. NEGLIGENCE (Code of Civil
Procedure § 1714)
9. GROSS NEGLIGENCE and/or
WANTON and RECKLESS
CONDUCT
10. NEGLIGENT SUPERVISION
HIRING, TRAINING AND
RETENTION
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

**AMOUNT DEMANDED
EXCEEDS \$10,000.00**

REQUEST FOR JURY TRIAL

**Judge:
Dept.:**

1 **COMPLAINT FOR DAMAGES**

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

4 COME NOW, PLAINTIFFS, who complain and allege as follows:
5

6 **GENERAL ALLEGATIONS AS TO THE PARTIES**

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

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

27 3. CEDARS-SINAI, and DEFENDANTS named herein, have publicly attempted
28

1 to scrub BROCK’S identity from their websites and materials without explanation despite 43
2 *years* of continuously employing BROCK, holding BROCK out as a premiere physician in the
3 field, and providing him unrestricted hospital privileges. Despite their recent efforts to conceal
4 their affiliation with BROCK, CEDARS-SINAI cannot hide his history of sexual deviance and
5 misconduct. CEDARS-SINAI actively and deliberately concealed BROCK’s sexual abuse of
6 female patients for years, continuing to grant BROCK unfettered sexual access to the women –
7 including minors – in his and CEDARS-SINAI’s care, all to protect DEFENDANT CEDARS-
8 SINAI’s reputation and financial gain.

9 4. CCP § 340.16 provides recourse for sexual assault victims and survivors who have
10 suffered physical, psychological, or other injuries, as a result of a DEFENDANT’S misconduct
11 which constitutes a sexual offense under Sections 243.4, 261, 254.1, 286, 287, or 289, or former
12 Sections 262 and 288a of the Penal Code. Under Sections 243.4, 261, 254.1, 286, 287, or 289, or
13 former Sections 262 and 288a of the Penal Code, the relevant offenses herein include, but are not
14 limited to, sexual misconduct, rape, criminal sexual acts, sexual penetration, forcible touching, and
15 predatory sexual assault. *See*, Penal Code §§ 243.4, 261, 254.1, 286, 287, and 289. The Sexual
16 Abuse and Cover-Up Accountability Act does not create a new cause of action; rather it revives
17 claims that can be asserted under existing law, such as tort claims for battery or assault. The Sexual
18 Abuse and Cover-Up Accountability Act amends California’s Civil Practice Law and Rules to
19 revive temporarily any and all expired claims related to certain sexual offenses committed against
20 individuals 18 years of age, or older, that took place on or after January 1, 2009, with the exception
21 of claims that were litigated to finality in court, or compromised by a settlement agreement, before
22 January 1, 2023. *See*, CCP § 340.16(b)(3). The law allows survivors of sexual assault, whose
23 claims were previously time-barred, to file a lawsuit against their abusers during a three-year
24 “look-back period” beginning on January 1, 2023, and ending on December 31, 2026. During the
25 look-back window, victims and survivors of sexual assault, can recover damages from their
26 abusers and their abusers ’enablers. Therefore, Plaintiffs’ claims are timely under CCP §§
27 340.16(a) and 340.16(b)(3) and other California State laws.
28

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

6. Plaintiffs JANE DOES 11, 32 and 48 through 61, through their counsel herein, state as follows against DEFENDANT BARRY J. BROCK, as well as DEFENDANTS CEDARS-SINAI MEDICAL CENTER, CEDARS-SINAI HEALTH SYSTEMS, CEDARS-SINAI MEDICAL GROUP, CEDARS-SINAI WOMEN’S MEDICAL GROUP, BEVERLY HILLS OBGYN, RODEO DRIVE WOMEN’S HEALTH CENTER, and BARRY J. BROCK, MD, INC., (collectively “DEFENDANTS” or “Defendants”), based upon their personal knowledge and, as to all other matters, upon information and belief, including their counsel’s investigation. Plaintiffs believe additional evidentiary support exists for their claims, which will be revealed when given the opportunity to conduct discovery.

THE PARTIES

PLAINTIFFS:

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

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

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

10. Plaintiff, JANE DOE 48, is an adult female and at all times relevant hereto, was a resident of the State of California and a citizen of the United States.

11. Plaintiff, JANE DOE 49, is an adult female and at all times relevant hereto, was a resident of the State of California and a citizen of the United States.

12. Plaintiff, JANE DOE 50, is an adult female and at all times relevant hereto, was a resident of the State of California and a citizen of the United States.

1 13. Plaintiff, JANE DOE 51, is an adult female and at all times relevant hereto, was
2 a resident of the State of California and a citizen of the United States.

3 14. Plaintiff, JANE DOE 52, is an adult female and at all times relevant hereto, was
4 a resident of the State of California and a citizen of the United States.

5 15. Plaintiff, JANE DOE 53, is an adult female and at all times relevant hereto, was
6 a resident of the State of California and a citizen of the United States.

7 16. Plaintiff, JANE DOE 54, is an adult female and at all times relevant hereto, was
8 a resident of the State of California and a citizen of the United States.

9 17. Plaintiff, JANE DOE 55, is an adult female and at all times relevant hereto, was
10 a resident of the State of California and a citizen of the United States.

11 18. Plaintiff, JANE DOE 56, is an adult female and at all times relevant hereto, was
12 a resident of the State of California and a citizen of the United States.

13 19. Plaintiff, JANE DOE 57, is an adult female and at all times relevant hereto, was
14 a resident of the State of California and a citizen of the United States.

15 20. Plaintiff, JANE DOE 58, is an adult female and at all times relevant hereto, was
16 a resident of the State of California and a citizen of the United States.

17 21. Plaintiff, JANE DOE59, is an adult female and at all times relevant hereto, was
18 a resident of the State of California and a citizen of the United States.

19 22. Plaintiff, JANE DOE 60, is an adult female and at all times relevant hereto, was
20 a resident of the State of California and a citizen of the United States.

21 23. Plaintiff, JANE DOE 61, is an adult female and at all times relevant hereto, was
22 a resident of the State of California and a citizen of the United States.

23 ***DEFENDANT, Barry J. BROCK, M.D.:***

24 24. DEFENDANT BROCK at all times mentioned herein, was and is an adult male,
25 who the Plaintiffs are informed and believe, and on that basis allege, lived in the State of California
26 during the period of time in which the sexual exploitation, abuse, harassment, and molestations set
27 forth herein took place, and is currently a resident of the State of California.
28

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

5 26. After completing his residency, BROCK immediately began his OB/GYN
6 practice at CEDARS-SINAI and CEDARS-SINAI HEALTH. At all relevant times between
7 1981 and 2024, BROCK remained an employee-agent of CEDARS-SINAI.

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

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

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

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

25 31. Plaintiffs are informed and believe, and on that basis assert, that BROCK is under
26 criminal investigation by the Los Angeles Police Department, based upon the sexually exploitative
27 and abusive conduct stated herein.
28

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

4 ***CORPORATE DEFENDANTS:***

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

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

20 35. While falsely representing to Plaintiffs, and the public, that BROCK was a
21 trustworthy, safe, and highly competent physician, the CORPORATE DEFENDANTS were
22 concealing multiple reports lodged by female patients, as well as reports from fellow medical
23 personnel at CORPORATE DEFENDANTS, about BROCK's sexual exploitation and abuse of
24 female patients.

25 36. Plaintiffs are informed and believe, and on this basis state, that the
26 CORPORATE DEFENDANTS received a myriad of complaints regarding BROCK'S sexually
27 abusive behavior and, therefore, knew of BROCK's dangerous propensities to sexually exploit
28 and abuse female patients.

1 37. Despite the CORPORATE DEFENDANTS' knowledge about BROCK'S
2 misconduct, Plaintiffs are informed and believe, and on this basis state, that CORPORATE
3 DEFENDANTS never once reported BROCK to law enforcement, or to the Medical Board of
4 California, despite the fact that CORPORATE DEFENDANTS are mandated reporters that have
5 a legal, moral, and ethical duty to make such reports.

6 38. Plaintiffs are informed and believe, and on that basis state, that CORPORATE
7 DEFENDANTS benefitted financially from retaining BROCK as an OB/GYN by offering his
8 services to CORPORATE DEFENDANTS' female patients, at those patients' detriment and
9 expense.

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

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

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

26 41. DEFENDANT CEDARS-SINAI, at all times mentioned herein was and is a
27 California Corporation, having its principal place of business in the State of California, County
28

1 of Los Angeles. DEFENDANT CEDARS-SINAI is located at 8700 Beverly Blvd., Los Angeles,
2 California.

3 42. DEFENDANT CEDARS-SINAI is a non-profit, tertiary, teaching hospital
4 established in 1902.

5 43. CEDARS-SINAI'S Code of Ethics states: "Cedars-Sinai expects all individuals
6 who provide services at Cedars-Sinai facilities to adhere to the guiding principles and standards
7 reflected in these Standards of Conduct."

8 44. DEFENDANT CEDARS-SINAI markets and promotes itself as being a safe,
9 affordable, and convenient healthcare provider where the general public, including the Plaintiffs
10 herein, can expect to receive the highest quality medical care and treatment, from highly-
11 qualified CEDARS-SINAI and/or CEDARS-SINAI HEALTH medical personnel—including
12 DEFENDANT BROCK.

13 45. At all relevant times herein, CEDARS-SINAI knew, or should have known,
14 that female patients, in particular, require safe, direct, and private access to gynecological and
15 reproductive healthcare treatment. In fact, CEDARS-SINAI's own website states that it offers
16 each patient - "The Care You Need from Doctors You Trust".

17 46. CEDARS-SINAI also represents to its patients, and the public at large, that it
18 provides "...caring, comprehensive, OBGYN care delivered by a team of specialists [and] routine
19 gynecological examinations, including pap smears, pelvic examinations and breast
20 examinations, are conducted by caring professionals experienced in women's health."

21 47. CEDARS-SINAI'S Mission Statement proclaims: "As a leading academic
22 healthcare organization, our mission is to elevate the health status of the community we serve."

23 48. DEFENDANTS CEDARS-SINAI and CEDARS-SINAI HEALTH,
24 independently held out DEFENDANT BROCK as an agent, actual, apparent and/or ostensible
25 agent, servant, representative and/or employee of DEFENDANT CEDARS-SINAI and/or
26 CEDARS-SINAI HEALTH by, among other things, publicly publishing information about their
27 physician on the website in a manner that would lead any reasonable person to conclude that
28

1 BROCK was, in fact, an agent, actual, apparent and/or ostensible agent, servant, representative
2 and/or employee of DEFENDANTS CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

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

4 49. Plaintiffs are informed and believe, and on this basis assert, that CEDARS-
5 SINAI HEALTH, at all times mentioned herein, was and is a California Corporation, having its
6 principal place of business in the State of California, County of Los Angeles. CEDARS-SINAI
7 HEALTH operates as an integrated health system with its principal place of business located at
8 8700 Beverly Blvd, in Los Angeles.

9 50. CEDARS-SINAI HEALTH includes CEDARS-SINAI, a nationally recognized
10 academic medical center, along with a network of primary and specialty care providers, research
11 institutions, and affiliated hospitals.

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

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

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

24 53. Plaintiffs are informed and believe, and on this basis assert, that CEDARS-
25 SINAI MEDICAL, at all times mentioned herein, was and is a California Corporation, having
26 its principal place of business in the State of California, County of Los Angeles.
27
28

1 54. CEDARS-SINAI MEDICAL is a non-profit obstetrics and gynecologic clinic,
2 directly affiliated with CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

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

7 56. CEDARS SINAI MEDICAL markets and promotes itself as being a safe,
8 affordable and convenient healthcare provider where the general public, including the Plaintiffs
9 herein, can expect to receive the highest quality medical care and treatment from highly qualified
10 CEDARS-SINAI and/or CEDARS-SINAI HEALTH medical personnel.

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

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

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

18 59. CEDARS-SINAI WOMEN'S, is a non-profit obstetrics and gynecologic clinic,
19 directly affiliated with CEDARS-SINAI and/or CEDARS-SINAI HEALTH.

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

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

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

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

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

8 64. DEFENDANT BEVERLY HILLS is a for-profit healthcare center located in
9 Beverly Hills, California and directly affiliated with CEDARS-SINAI and/or CEDARS-SINAI
10 HEALTH.

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

15 66. BEVERLY HILLS markets and promotes itself as being a safe, affordable and
16 convenient healthcare provider where the general public, including the Plaintiffs herein, can
17 expect to receive the highest quality medical care and treatment from highly qualified
18 BEVERLY HILLS medical personnel.

19 67. At all times relevant herein, BEVERLY HILLS knew, or should have known,
20 that female patients, in particular, require safe, direct, and private access to gynecological and
21 reproductive healthcare treatment.

22 ***F. DEFENDANT Rodeo Drive Women’s Health Center:***

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

26 69. DEFENDANT RODEO DRIVE is a for-profit medical facility located in Los
27 Angeles, California and directly affiliated with CEDARS-SINAI and/or CEDARS-SINAI
28 HEALTH.

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

5 71. RODEO DRIVE proclaimed itself to be “A full-service OBGYN practice
6 dedicated to providing women in the Beverly Hills area with the high level of care that they
7 deserve in the fields of pregnancy, high-risk obstetrics and gynecology”.

8 72. Furthermore, RODEO DRIVE markets and promotes itself as being a safe,
9 affordable, and convenient healthcare provider where the general public, including the Plaintiffs
10 herein, can expect to receive the highest quality medical care and treatment from highly qualified
11 RODEO DRIVE medical personnel.

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

16 74. At all times relevant herein, RODEO DRIVE knew, or should have known, that
17 female patients, in particular, require safe, direct, and private access to gynecological and
18 reproductive healthcare treatment.

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

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

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

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

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

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

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

11 81. DEFENDANTS DOES 1 through 100, inclusive, and each of them, are sued
12 herein under said fictitious names. Plaintiffs are ignorant as to the true names and capacities of
13 DOES 1 through 100, whether individual, corporate, associate, or otherwise, and therefore sue
14 said DEFENDANTS by such fictitious names. When their true names and capacities are
15 ascertained, Plaintiffs will request leave of Court to amend this Complaint to state their true
16 names and capacities herein.

17 **STATEMENT OF JURISDICTION AND VENUE**

18 **For Adult Victims of Sexual Abuse**

19 82. This action is brought, *inter alia*, pursuant to California Civil Procedure (CCP)
20 § 340.16 and the Sexual Abuse and Cover-Up Accountability Act. Plaintiffs include female
21 patients who were sexually assaulted, sexually exploited, and sexually abused by BROCK who
22 was employed, supervised, contracted, hired, managed, controlled, directed, protected, and
23 enabled, by DEFENDANTS to render medical care and treatment to female patients.

24 83. California Civil Procedure (CCP) § 340.16 provides recourse for adult sexual
25 assault victims and survivors who have suffered physical, psychological, or other injuries, as a
26 result of a DEFENDANTS' misconduct which constitutes a sexual offense. The relevant
27 offenses herein include, but are not limited to, sexual misconduct, rape, criminal sexual acts,
28

1 sexual penetration, forcible touching, and predatory sexual assault. *See*, Penal Code § 243.4,
2 261, 254.1, 286, 287, and 289.

3 84. The Sexual Abuse and Cover-Up Accountability Act revives claims that can be
4 asserted under existing law, such as tort claims for battery or assault. The Sexual Abuse and
5 Cover-Up Accountability Act amended California’s Civil Practice Law and Rules to revive
6 temporarily any and all expired claims related to certain sexual offenses committed against
7 individuals 18 years of age, or older, that took place on or after January 1, 2009, with the
8 exception of claims that were litigated to finality in court, or compromised by a settlement
9 agreement, before January 1, 2023. *See*, CCP § 340.16(b)(3). The law allows survivors of sexual
10 assault, whose claims were previously time-barred, to file a lawsuit against their abusers during
11 a three-year “look-back period” beginning on January 1, 2023, and ending on December 31,
12 2026. During the look-back window, victims and survivors of sexual assault, can recover
13 damages from their abusers and their abusers’ enablers. Therefore, plaintiffs’ claims are timely
14 under CCP §§ 340.16(a) and 340.16(b)(3) and other California State laws.

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

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

26 86. At the time these misrepresentations and omissions were made,
27 DEFENDANTS knew they were false. They were aware that BROCK’s examinations and
28

1 conduct were inappropriate, illegitimate, and not within any standard of care for any medical
2 specialty. The acts were performed for BROCK's personal sexual gratification, not for medical
3 purposes.

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

10 88. Plaintiffs reasonably relied on DEFENDANTS' misrepresentations and
11 omissions in the following ways:

12 a. They believed BROCK's examinations were medically appropriate and
13 legitimate;

14 b. They were unaware of the inappropriateness of BROCK's conduct; and

15 c. They did not realize they had potential legal claims against BROCK and the
16 CORPORATE DEFENDANTS for his misconduct and the subsequent cover-up.

17 89. Directors, managers, supervisors, physicians, nurses, and other staff at
18 CEDARS-SINAI, CEDARS-SINAI HEALTH, CEDARS SINAI MEDICAL, CEDARS SINAI
19 WOMEN'S, BEVERLY HILLS, RODEO DRIVE, and/or BROCK, INC., took deliberate
20 actions to conceal BROCK's misconduct. These actions included suppressing complaints,
21 failing to act on reports, and continuing to expose female patients to BROCK despite knowledge
22 of his prior misconduct.
23

24 90. The conduct described above constitutes fraud, fraudulent concealment,
25 conspiracy, aiding and abetting, and a coordinated effort to obstruct justice.
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1 91. As a result of DEFENDANTS' wrongful conduct, the statute of limitations on
2 Plaintiffs' claims was equitably tolled, and DEFENDANTS are equitably estopped from
3 asserting it as a defense.

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

6 a. Allowing BROCK to remain in a position of trust despite knowledge of his
7 behavior;

8 b. Scheduling patients with BROCK without a chaperone;

9 c. Providing BROCK unfettered access to female patients under the guise of
10 legitimate obstetrics and gynecological care;

11 d. Misrepresenting BROCK as competent and as a physician who adheres to
12 appropriate medical practices and conduct;

13 e. Failing to disclose BROCK's prior misconduct to patients, the public, or
14 authorities;

15 f. Neglecting to investigate prior complaints or reports;

16 g. Failing to implement safeguards to prevent BROCK's misconduct; and

17 h. Neglecting to establish systems for proper supervision and mandatory reporting
18 under California Penal Code § 11160.

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

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

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

5 96. Plaintiffs did not, and could not reasonably, discover their claims against
6 BROCK and the CORPORATE DEFENDANTS until they learned of similar reports from other
7 victims and consulting legal counsel.
8

9 **For Childhood Victims of Sexual Abuse**

10 97. As amended effective January 1, 2024, § 340.1(p) provides that any case "in
11 which the childhood sexual assault occurred on or before December 31, 2023, may only be
12 commenced pursuant to the applicable statute of limitations set forth in existing law as it read
13 on December 31, 2023." Thus, Plaintiff's right to recover damages is governed by § 340.1 as
14 amended by Stats.2022, c. 444 (A.B. 2959), § 1, eff. Jan. 1, 2023.
15

16 98. As it existed on December 31, 2023, Code Civ. Proc. § 340.1 permitted a
17 plaintiff to bring an action arising from childhood sexual assault prior to plaintiff attaining age
18 40, "or within five years from date the plaintiff discovers or reasonably should have discovered
19 that psychological injury or illness occurring after the age of majority was caused by the sexual
20 assault []."
21

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

Cedars-Sinai's Culture of Concealing Sexual Misconduct

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

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

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

103. Accordingly, at all relevant times herein, the CORPORATE DEFENDANTS were, or reasonably should have been, aware of BROCK'S serial misconduct, exploitation, abuse,

1 gross misconduct, and reckless and wanton disregard for patient safety. BROCK'S misconduct
2 violates the applicable standards of care and comports with each of the Plaintiffs' individual
3 descriptions of their interactions and experiences with BROCK, as stated in detail herein.

4 104. BROCK'S sexual misconduct while at CEDARS-SINAI, CEDARS-SINAI
5 HEALTH, CEDARS-SINAI MEDICAL, CEDARS-SINAI WOMEN'S, BEVERLY HILLS,
6 RODEO DRIVE, and BROCK, INC., is well-documented, and was well known to the
7 CORPORATE DEFENDANTS for decades.
8

9 105. Despite an abundance of litigation, and all of the patient reports about
10 BROCK'S serial misconduct, exploitation, and abuse, the CORPORATE DEFENDANTS have
11 done nothing except cover up DEFENDANT BROCK'S actions from the public, law enforcement,
12 and the very patients who have entrusted their health and medical care to the DEFENDANTS
13 named herein.
14

15 ***BROCK'S Sexual Abuse of Plaintiffs***

16 106. Based on information and belief, Plaintiffs allege that BROCK sexually abused
17 countless female patients, including Plaintiffs, over the course of decades. Using his position of
18 trust and authority as a highly sought after physician employed by the CORPORATE
19 DEFENDANTS, BROCK engaged in sexually exploitive misconduct including, but not limited
20 to: directing Plaintiffs to remove their clothing in front of him as he watched; performing
21 prolonged and medically unnecessary pelvic exams; groping Plaintiffs' breasts without gloves;
22 digitally penetrating Plaintiffs' vaginas and anuses without gloves or handwashing; performing
23 sadistic pap smears, and routinely making sexually inappropriate remarks regarding the size,
24 appearance, and details of Plaintiffs' external genitalia or breasts.
25

26 107. Plaintiffs allege the CORPORATE DEFENDANTS emboldened BROCK to
27 exploit his patients by refusing to acknowledge scores of complaints made internally to staff
28

1 members, nurses, and other licensed physicians at CORPORATE DEFENDANTS. Complaints
2 were met with a callous indifference indicative of a culture suppressing reports of sexual
3 misconduct. Nurses frequently dismissed complaints made by BROCK'S patients instead
4 warning, "best to let it lie" or that they were not surprised – a clear implication BROCK had a
5 widely known reputation for the type of interactions alleged herein.

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

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

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

4 **A. Specific Factual Allegations – Plaintiff JANE DOE #11**

5
6 111. When Plaintiff JANE DOE #11 became pregnant with her first child in 2013,
7 she chose CEDARS for her pre-natal care because they were top-rated, and they would accept
8 her Medicare insurance. When she called CEDARS, she booked an appointment with a female
9 obstetrician, because she had had a difficult time with a male psychiatrist as a teen and was wary
10 of male practitioners. However, before her appointment, CEDARS called her back and told her
11 that they did not have a female available to see her, but assured her that BROCK would take
12 good care of her. She placed her trust and confidence in BROCK, believing that the healthcare
13 providers at CEDARS, and BROCK in particular, were trustworthy and skilled, and would
14 provide excellent care to her and her baby throughout her pregnancy and delivery.

15
16 112. BROCK thereby garnered Plaintiff JANE DOE #11’s trust and confidence,
17 which he took advantage of in order to sexually abuse and harass her.

18
19 113. When Plaintiff JANE DOE #11 showed up to her appointments, BROCK very
20 forcefully inserted his fingers into her vagina, and also touched and rubbed her clitoris with his
21 bare hands without gloves, before the nurse came into the room. When the nurse entered,
22 BROCK put on gloves, did not touch or rub her clitoris, but did repeat the pelvic exam.
23 Throughout her pregnancy, this pattern repeated itself, forcing Plaintiff JANE DOE #11 to
24 endure two vaginal exams each visit: one exam performed in an aggressive (and what she now
25 understands to be inappropriate) manner, with ungloved hands, when she was alone in the room
26 with BROCK; and a more clinical, but still invasive exam, once the nurse was present.
27
28

1 114. During the time that she was a patient of BROCK'S, he also performed what
2 Plaintiff JANE DOE #11 now knows to have been sexually abusive breast exams. Rather than
3 taking two fingers and feeling in circles for lumps, BROCK would hold her breast with his whole
4 hands and touch and rub her breasts in a manner which she now realizes was more akin to that
5 of a sexual partner than a physician. These breast "examinations" also took place before the
6 nurse was present in the exam room. At the time, again, Plaintiff JANE DOE #11 had been
7 lulled into believing that she was being provided high quality, pre-natal care by a skilled
8 obstetrician and gynecologist at a reputable clinic, while she now knows that she was being
9 sexually harassed, assaulted and abused by BROCK, all for his own gratification.
10

11 115. BROCK also performed Pap smears very frequently throughout Plaintiff JANE
12 DOE #11's pregnancy. BROCK was very rough when inserting the speculum into her, and the
13 tests were very painful. BROCK seemed to enjoy her discomfort, and he would ignore her
14 protests. Plaintiff JANE DOE #11 now knows that Pap tests should be performed far less
15 frequently than BROCK performed them during her pre-natal visits. At the time, however,
16 Plaintiff JANE DOE #11 trusted that CEDARS and BROCK were providing her with high
17 quality care, only later learning that she was indeed being sexually harassed, assaulted and
18 abused by BROCK, all for his own gratification.
19

20 116. When Plaintiff JANE DOE #11 would arrive at the clinic, the nurse would hand
21 her a little square to "cover her private parts." She was not given a gown, but was told to "take
22 everything off" and "cover up" with this tiny square. She would often leave her bra on, until
23 BROCK would have her remove it to "examine" her breasts, and she always felt very exposed
24 in the examination room. However, again, because Plaintiff JANE DOE #11 had been lulled
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1 into the belief that she was being provided with high quality pre-natal care by a skilled
2 obstetrician, in a reputable clinic, she continued to comply with the instructions to her.

3 117. BROCK kept Plaintiff JANE DOE #11 off balance and made her feel self-
4 conscious during her exams. BROCK told her, for example, that she was “getting too fat, and
5 to stop drinking whole milk” which made her feel insecure and distracted her from what she now
6 knows to have been sexually abusive exams.
7

8 118. At some point during her pregnancy, when she was alone in the exam room
9 with BROCK, Plaintiff JANE DOE #11 asked BROCK, “Isn’t someone supposed to be in here
10 with you?” To which BROCK responded, “You have a diagnosis. No one will believe you.”
11 Plaintiff JANE DOE #11 has been diagnosed with Aspergers (autism spectrum disorder) and
12 schizophrenia (which is well controlled by her medications.) BROCK would have known about
13 her “disabilities” because of her medical records, and also because her baby’s father would have
14 told him. BROCK’s words made Plaintiff JANE DOE #11 doubt her understanding that a
15 chaperone should be present at all times.
16

17 119. BROCK delivered Plaintiff JANE DOE #11’s baby at CEDARS with both of
18 her parents present. BROCK’s treatment of her was very different during the delivery, with her
19 parents present, than it had been in his office. Looking back now, this difference in treatment in
20 front of others reinforces for Plaintiff JANE DOE #11 that she suffered sexual abuse at the hands
21 of BROCK during her pre-natal visits.
22

23 120. Following the delivery, BROCK stitched Plaintiff JANE DOE #11 in a manner
24 that has caused her to experience vaginal and clitoral pain. Plaintiff JANE DOE #11 now
25 believes that the manner in which he performed this “repair” of her intimate anatomy was yet
26 another way in which BROCK sexually abused her, all for his own gratification.
27
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1 121. In 2014, with the support of friends, Plaintiff JANE DOE #11 called CEDARS
2 to complain about her treatment at the hands of BROCK. The nurse with whom she spoke, told
3 her, "I am not supposed to tell you this, but we have received other complaints about Dr.
4 BROCK." Plaintiff JANE DOE #11 never received a written response from CEDARS, however,
5 nor was she advised that CEDARS had done anything with respect to her complaint. At the
6 time, Plaintiff JANE DOE #11 still believed that CEDARS was a top-rated and responsible
7 medical institution, and the fact that CEDARS did not see fit to follow up or pursue her complaint
8 made her believe that her complaint must not have risen to the level necessary to require a
9 response. It made her doubt her own response to BROCK's treatment of her.
10

11 122. When Plaintiff JANE DOE #11 learned that BROCK was being sued for sexual
12 misconduct with patients, she understood that BROCK had in fact sexually assaulted her, and
13 that CEDARS had not only known about his misconduct, but had failed to protect her from this
14 sexual predator.
15

16 123. Plaintiff JANE DOE #11 now knows that the frequency, sometimes roughness,
17 and sometimes massaging nature of her vaginal exams, the forcefulness with which BROCK
18 inserted the speculum into her, along with the fondling nature of her breast exams, were
19 unnecessary, and that these exams were all performed in a non-medical manner, to sexually
20 abuse her and to gratify BROCK. Plaintiff JANE DOE #11 also now knows that BROCK's
21 comments were not relevant, nor were they a part of legitimate healthcare, but were meant to
22 keep her off balance so that he could more easily take advantage of her to sexually harass and
23 abuse her and gratify himself.
24

25 124. Because BROCK took advantage of Plaintiff JANE DOE #11 during her pre-
26 natal exams to abuse her, and because CEDARS failed to follow up on her complaint, Plaintiff
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1 JANE DOE #11 has experienced feelings of betrayal, humiliation, depression and anxiety,
2 intrusive thoughts and other symptoms of PTSD which have resulted in physical manifestations
3 of that distress including sleeplessness and lack of focus. Plaintiff JANE DOE #11 also fears
4 medical providers and has avoided any form of gynecological care for fear of pain for over a
5 decade.

6
7 **B. Specific Factual Allegations – JANE DOE #32**

8 125. Plaintiff JANE DOE #32 is an adult woman and was a patient of CORPORATE
9 DEFENDANTS and BROCK in or about 1986 when she was only 21 years old.

10 126. Plaintiff JANE DOE #32 had scheduled an appointment with her regular
11 gynecologist. When she arrived, her regular gynecologist (BROCK'S partner) was not available,
12 and Plaintiff JANE DOE #32 was told that BROCK was covering for his patients for that day
13 and would be the doctor whom she would see. Plaintiff JANE DOE #32 placed her trust and
14 confidence in BROCK, believing that the healthcare providers at CEDARS were trustworthy
15 and skilled. BROCK garnered Plaintiff JANE DOE #32's trust and confidence, in large part
16 through the good will established by his partner at CEDARS, which he then took advantage of
17 in order to sexually abuse and harass her.

18
19 127. Plaintiff JANE DOE #32 arrived for her appointment late in the day, after
20 BROCK had dismissed his nurse. Therefore, BROCK took her back to the examination room
21 himself and told her to get undressed. BROCK did not offer her a privacy gown or cloth. She
22 was completely naked and exposed throughout the entire "examination."

23
24 128. BROCK first engaged in an "examination" of her breasts. BROCK caressed
25 her breasts and nipples using both of his hands to massage both of her breasts at the same time.
26 BROCK told her, "You have beautiful breasts."

1 129. BROCK then performed a pelvic “exam” during which he stroked her external
2 genitalia, inserted the speculum and continued to stroke her labia over her hair, while stating
3 “Wow, you are so beautiful.”

4 130. Plaintiff JANE DOE #32 did not believe that a physician in a reputable practice
5 would be engaging in inappropriate behavior. BROCK was a doctor and a trusted authority to
6 Plaintiff JANE DOE #32; and she was at CEDARS Sinai Medical Center – a place she believed
7 to be one of the most trusted hospitals in the world.

8 131. Following her appointment, however, Plaintiff JANE DOE #32 told her mother
9 what had happened during her examination with BROCK. Her mother then went with her to
10 meet Plaintiff JANE DOE #32’s regular CEDARS’ gynecologist (who also treated her mother).
11 At that meeting, she and her mother informed their regular CEDARS’ gynecologist (BROCK’s
12 partner) what had happened to Plaintiff JANE DOE #32 during her examination, when she was
13 alone with BROCK.
14

15 132. Plaintiff JANE DOE #32’s regular CEDARS’ gynecologist did not say much
16 during that meeting, and no one from CEDARS ever followed up with her or her mother
17 regarding their complaints. The way that her trusted gynecologist (who, upon information and
18 belief, later became the Chief of Obstetrics and Gynecology at CEDARS) responded to her
19 caused her to question herself and made her believe (especially as she had minimal experience
20 with gynecological care) that she had overreacted.
21

22 133. Upon learning that BROCK was being sued for sexual harassment, Plaintiff
23 JANE DOE #32 came to understand that BROCK did indeed perform his “exams” and speak to
24 her in a non-medically acceptable manner for no other reason than his own sexual gratification
25 and to sexually harass and abuse her.
26

1 134. Because BROCK took advantage of Plaintiff JANE DOE #32 during this very
2 vulnerable examination --and when she was so young-- in order to sexually abuse and harass
3 her, she distrusts gynecologists and has been reluctant to seek care. BROCK's actions negatively
4 impacted her interactions and relationships with men as well. BROCK's sexual abuse, coupled
5 with CEDARS' refusal to take any action to protect her, has caused Plaintiff JANE DOE #32 to
6 suffer feelings of betrayal, anxiety, intrusive thoughts and other symptoms of PTSD which have
7 resulted in physical manifestations of that distress including sleeplessness and lack of focus.
8

9 **C. Specific Factual Allegations – JANE DOE #48**

10 135. Plaintiff JANE DOE #48 is an adult woman and was a patient of CORPORATE
11 DEFENDANTS and BROCK in or about 2010.

12 136. Plaintiff JANE DOE #48 was a patient of CEDARS-SINAI for treatment of
13 uterine fibroids and was seen by BROCK rather than her usual physician.
14

15 137. Plaintiff JANE DOE #48 relied on CEDARS-SINAI as a longtime patient and
16 trusted that its practitioners, including BROCK, would provide her with legitimate and medically
17 necessary care. BROCK violated this trust and sexually abused, assaulted, and/or harassed
18 Plaintiff JANE DOE #48.

19 138. At her appointment in or about May 2010, BROCK entered the examination
20 room without introducing himself to Plaintiff JANE DOE #48 despite having never previously
21 met or examined her.
22

23 139. Plaintiff JANE DOE #48 explained the reason for her visit, and BROCK
24 encouraged her to undergo a hysterectomy since she was too old to have any children, despite
25 her usual gynecologist telling her that she could still be a mother.
26
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1 140. BROCK then, without warning, moved onto the pelvic “examination” and
2 digitally penetrated Plaintiff JANE DOE #48’s vagina with his ungloved, unlubricated fingers
3 and aggressively moved his fingers inside Plaintiff JANE DOE #48’s vagina.

4 141. Plaintiff JANE DOE #48 told BROCK that he was hurting her, and BROCK
5 left the examination room without further explanation and without washing his hands.

6 142. Plaintiff JANE DOE #48 complained about BROCK’s conduct to employees
7 and/or agents of CEDARS-SINAI, including her regular CEDARS-SINAI gynecologist, who
8 said that what she described was BROCK’s usual demeanor.

9 143. Based on the reputation and representation of CEDARS-SINAI, as well as her
10 complaints about BROCK being disregarded, Plaintiff JANE DOE #48 was lulled into the belief
11 that she was being provided with legitimate gynecological care.

12 144. Upon learning that BROCK was being sued for sexual misconduct involving
13 patients, Plaintiff JANE DOE #48 realized that BROCK’s conduct was in fact sexually abusive,
14 assaultive, and/or harassing.

15 145. Plaintiff JANE DOE #48 now knows that her pelvic examination was
16 performed in a non-medical manner to stimulate sexual intercourse for BROCK’s own sexual
17 gratification.

18 146. As a result of BROCK’s sexual misconduct, Plaintiff JANE DOE #48
19 experienced and continues to experience feelings of betrayal, humiliation, embarrassment, and
20 disrespect. As an African-American woman, Plaintiff JANE DOE #48’s assault at the hands of
21 BROCK, a white physician, and the disregard from CORPORATE DEFENDANTS, heightened
22 Plaintiff JANE DOE #48’s significant emotional distress.

D. Specific Factual Allegations –JANE DOE #49

147. Plaintiff JANE DOE #49 is an adult woman and was an OB/GYN patient of CORPORATE DEFENDANTS and BROCK from approximately January 2014 through July 2014.

148. Plaintiff JANE DOE #49 was referred to CEDARS-SINAI MEDICAL CENTER by her primary care physician after discovering she was pregnant and was assigned BROCK as her obstetrician.

149. Plaintiff JANE DOE #49 trusted CEDARS-SINAI MEDICAL CENTER and BROCK to provide her with legitimate and medically necessary care. BROCK violated this trust and confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #49.

150. During Plaintiff JANE DOE #49's first prenatal visit with BROCK, BROCK insisted upon performing a breast examination and used both hands simultaneously to "examine" her breasts.

151. During this "exam" BROCK became fixated on Plaintiff JANE DOE #49's nipple piercings and asked for how long her nipples had been pierced, if the piercings hurt, and if the piercings were "pleasurable" or "fun."

152. At another prenatal appointment, BROCK performed a Pap smear and commented on Plaintiff JANE DOE #49's physical appearance, complimenting her figure and referring to her vagina as "tight" and "nicely groomed."

153. Throughout the course of Plaintiff JANE DOE #49's prenatal appointments with BROCK, BROCK performed at least five (5) pelvic examinations to "check her cervix" with his ungloved hands.

154. A chaperone was not present for these "cervix checks" performed by BROCK.

155. Based on CEDARS-SINAI's and BROCK's representations and reputation, Plaintiff JANE DOE #49 was lulled into the belief that BROCK's conduct was medically necessary, and she was being provided legitimate obstetrical care.

1 156. Upon learning that BROCK was being sued for sexual misconduct involving
2 patients, Plaintiff JANE DOE #49 realized BROCK's conduct was in fact sexually abusive,
3 assaultive, and/or harassing.

4 157. Plaintiff JANE DOE #49 now knows that her prenatal appointments were
5 performed in a non-medical manner and for BROCK's own sexual gratification.

6 158. Plaintiff JANE DOE #49 also now knows that the sexually harassing comments
7 were intended to embarrass, degrade, and distract Plaintiff JANE DOE #49 from the
8 inappropriate nature of BROCK's conduct.

9 159. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #49 has
10 experienced significant emotional distress and feelings of betrayal, humiliation, and
11 embarrassment.

12 **E. Specific Factual Allegations – JANE DOE #50**

13 160. Plaintiff JANE DOE #50 is an adult woman and was an OB/GYN patient of
14 CORPORATE DEFENDANTS and BROCK in approximately 2007.

15 161. Plaintiff JANE DOE #50 saw BROCK for prenatal appointments through the
16 entirety of her pregnancy, and BROCK was the physician responsible for the delivery of her
17 daughter at CEDARS-SINAI MEDICAL CENTER.

18 162. Plaintiff JANE DOE #50 trusted CORPORATE DEFENDANTS and BROCK
19 to provide her with legitimate and medically necessary care. BROCK violated this trust and
20 confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #50.

21 163. At a prenatal appointment towards the end of her pregnancy, Plaintiff JANE
22 DOE #50 was given a pelvic examination by BROCK.
23

24 164. BROCK inserted his ungloved fingers into Plaintiff JANE DOE #50's vagina
25 and moved his fingers inside Plaintiff JANE DOE #50's vagina in (what she now knows to have
26 been) a non-medical manner for a prolonged period.
27
28

1 165. A chaperone was not present for this appointment or pelvic examination with
2 BROCK.

3 166. After this appointment, Plaintiff JANE DOE #50 developed a yeast infection.

4 167. Based on CORPORATE DEFENDANTS and BROCK's representations and
5 reputation, Plaintiff JANE DOE #50 was lulled into the belief that BROCK's conduct was
6 medically necessary, and she was being provided legitimate obstetrical care.
7

8 168. Upon learning that BROCK is being sued for sexual misconduct involving
9 patients, Plaintiff JANE DOE #50 realized BROCK's conduct was in fact sexually abusive,
10 assaultive, and/or harassing.

11 169. Plaintiff JANE DOE #50 now understands that her prenatal pelvic examination
12 was performed in a non-medical manner and for BROCK's own sexual gratification.
13

14 170. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #50 has
15 experienced significant emotional distress and feelings of betrayal, humiliation, physical
16 discomfort and infection, and embarrassment.

17 **F. Specific Factual Allegations – JANE DOE #51**

18 171. Plaintiff JANE DOE #51 is an adult woman and was an OB/GYN patient of
19 CORPORATE DEFENDANTS and BROCK from approximately 2001 through 2002.
20

21 172. Plaintiff JANE DOE #51 saw BROCK for prenatal appointments for the
22 entirety of her pregnancy, and for one postnatal appointment, on the advice of her primary care
23 physician after becoming pregnant for the first time.

24 173. Plaintiff JANE DOE #51 trusted CORPORATE DEFENDANTS and BROCK
25 to provide her with legitimate and medically necessary care. BROCK violated this trust and
26 confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #51.
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1 174. At each prenatal appointment, BROCK required Plaintiff JANE DOE #51 to
2 undergo an invasive and prolonged pelvic examination.

3 175. BROCK would not explain what he was going to do, what he was presently
4 doing, or his purpose for doing so during these pelvic examinations.

5 176. Plaintiff JANE DOE #51 was further subjected to breast examinations at each
6 prenatal appointment with BROCK, during which BROCK would fondle her breasts with both
7 hands simultaneously and for an extended period.

8 177. BROCK performed these “exams” under the guise of ensuring that Plaintiff
9 JANE DOE #51 would be ready to breastfeed her child upon delivery and would ask Plaintiff
10 JANE DOE #51 questions about breastfeeding during these “exams” to distract her from what
11 she now knows to have been his improper conduct.

12 178. At one appointment, BROCK asked Plaintiff JANE DOE #51 a series of
13 invasive questions regarding her sexual relationship with her husband, including whether she
14 was a virgin before she was married, the number of sexual partners she had prior to her marriage,
15 and questioned how well she really knew her husband.

16 179. Plaintiff JANE DOE #51 saw BROCK for one (1) postnatal appointment to
17 examine her healing after experiencing significant vaginal tearing during delivery.

18 180. During this appointment, BROCK opened Plaintiff JANE DOE #51’s privacy
19 gown to perform a breast “examination” under the guise of checking for clogged ducts without
20 any prior discussion with Plaintiff JANE DOE #51 about breastfeeding.

21 181. A chaperone was not present during Plaintiff JANE DOE #51’s prenatal and
22 postnatal appointments.

1 182. Based on CORPORATE DEFENDANTS' and BROCK's representations and
2 reputation, Plaintiff JANE DOE #51 was lulled into the belief that BROCK's conduct was
3 medically necessary, and she was being provided with legitimate obstetrical care.

4 183. Upon learning that BROCK is being sued for sexual misconduct involving
5 patients, Plaintiff JANE DOE #51 realized BROCK's conduct was in fact sexually abusive,
6 assaultive, and/or harassing.

7 184. Plaintiff JANE DOE #51 now knows that her prenatal and postnatal
8 examinations were performed in a non-medical manner and for BROCK's own sexual
9 gratification.

10 185. Plaintiff JANE DOE #51 also now knows that BROCK's sexually harassing
11 comments were intended to degrade and distract from his improper conduct.

12 186. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #51 has
13 experienced significant emotional distress and feelings of betrayal, humiliation, self-doubt, and
14 embarrassment.

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17 **G. Specific Factual Allegations – JANE DOE #52**

18 187. Plaintiff JANE DOE #52 is an adult woman and was an OB/GYN patient of
19 CORPORATE DEFENDANTS and BROCK for several years throughout the 1990s.

20 188. Plaintiff JANE DOE #52 was a patient of CEDARS-SINAI MEDICAL
21 CENTER and saw BROCK for routine gynecological appointments over a period of several
22 years.

23 189. Plaintiff JANE DOE #52 trusted CEDARS-SINAI MEDICAL CENTER and
24 BROCK to provide her with legitimate and medically necessary care. BROCK violated this trust
25 and confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #52.
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1 190. Plaintiff JANE DOE #52's appointments with BROCK included a breast
2 examination, at which time BROCK would fondle and massage Plaintiff JANE DOE #52's
3 breasts for a prolonged period.

4 191. Plaintiff JANE DOE #52's appointments with BROCK also included prolonged
5 pelvic examinations with digital penetration in what Plaintiff now understands was intended to
6 be a sexually stimulating manner. BROCK's other hand would be casually placed on Plaintiff
7 JANE DOE #52's legs throughout the pelvic examination.
8

9 192. BROCK also subjected Plaintiff JANE DOE #52 to rectal examinations and
10 inserted his finger into Plaintiff JANE DOE #52's anus without warning.

11 193. When Plaintiff JANE DOE #52 expressed alarm at this sudden intrusion,
12 BROCK assured Plaintiff JANE DOE #52 that it was a necessary part of the examination.
13

14 194. Moreover, throughout her time as a patient, BROCK would frequently
15 compliment Plaintiff JANE DOE #52's physical appearance.

16 195. Based on CEDARS-SINAI's and BROCK's representations and reputation,
17 Plaintiff JANE DOE #52 was lulled into the belief that BROCK's conduct was medically
18 necessary, and she was being provided legitimate gynecologic care.

19 196. Upon learning that BROCK was being sued for sexual misconduct involving
20 patients, Plaintiff JANE DOE #52 realized BROCK's conduct was in fact sexually abusive,
21 assaultive, and/or harassing.
22

23 197. Plaintiff JANE DOE #52 now knows that her gynecological examinations were
24 performed in a non-medical manner and for BROCK's own sexual gratification.
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1 198. Plaintiff JANE DOE #52 also now knows that the sexually harassing comments
2 were intended to embarrass, degrade, and distract Plaintiff JANE DOE #52 from the
3 inappropriate nature of BROCK's conduct.

4 199. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #52 has
5 experienced significant emotional distress and feelings of betrayal, humiliation, and
6 embarrassment.
7

8 **H. Specific Factual Allegations – JANE DOE #53**

9 200. Plaintiff JANE DOE #53 is an adult woman and was a patient of BROCK and
10 CORPORATE DEFENDANTS in or about 2012 until approximately 2016.

11 201. Plaintiff JANE DOE #53 became a patient of BROCK in or about February
12 2012 upon a referral from her DEFENDANT CEDARS-SINAI physician for further
13 examination after receiving inconclusive uterine biopsy results, and on an annual basis thereafter
14 until approximately June 2016.
15

16 202. Plaintiff JANE DOE #53 was an established patient of DEFENDANT
17 CEDARS-SINAI and trusted that its physicians, including BROCK, would provide her with
18 legitimate and medically necessary care. BROCK violated this trust to sexually abuse, assault,
19 and/or harass Plaintiff JANE DOE #53.
20

21 203. At most, if not all, of Plaintiff JANE DOE #53's appointments with BROCK,
22 BROCK would perform a lengthy pelvic examination with digital penetration.

23 204. During each of these "exams", BROCK would comment that the length of
24 Plaintiff JANE DOE #53's vaginal canal made visual and/or digital examination difficult such
25 that Plaintiff JANE DOE #53 was required to undergo a transvaginal ultrasound with other
26 CEDARS-SINAI employees and/or agents.
27
28

1 205. Further, BROCK took numerous Pap smears from Plaintiff JANE DOE #53
2 and again, would comment that the length of her vaginal canal made obtaining cervical cell
3 samples difficult.

4 206. As Plaintiff JANE DOE #53's years-long health provider, BROCK knew or
5 should have known that Plaintiff JANE DOE #53 required a transvaginal ultrasound rather than
6 digital or visual examination, yet BROCK subjected Plaintiff JANE DOE #53 to gratuitous
7 vaginal examinations at all or most of her appointments under the guise of legitimate medical
8 care.

9
10 207. Based on the reputation and representations of BROCK and CEDARS-SINAI,
11 Plaintiff JANE DOE #53 was lulled into the belief that she was being provided with legitimate
12 and medically necessary gynecologic care.

13
14 208. Only after learning that BROCK was being sued for sexual misconduct
15 involving patients did Plaintiff JANE DOE #53 come to understand that BROCK's conduct was
16 in fact sexually abusive, assaultive, and/or harassing.

17 209. Plaintiff JANE DOE #53 now knows that the pelvic examinations were
18 performed in a non-medical manner and for BROCK's sexual gratification.

19 210. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #53 has
20 suffered emotional distress and feelings of humiliation, embarrassment, shame, and betrayal.

21
22 **I. Specific Factual Allegations – JANE DOE #54**

23 211. Plaintiff JANE DOE #54 received gynecological care from BROCK at Cedars-
24 Sinai Medical Group in or about the late 1990s to the early 2000s.

25 212. At the time, she believed Cedars-Sinai to be one of the most elite medical
26 providers in the country and expected that BROCK, as a Cedars physician, would administer
27 high-quality, professional care.
28

1 213. Throughout Plaintiff JANE DOE #54's appointments with BROCK, BROCK
2 would examine Plaintiff JANE DOE #54 in a manner that Plaintiff JANE DOE #54 now realizes
3 was sexual in nature and inappropriate.

4 214. For example, on one occasion BROCK stroked Plaintiff JANE DOE #54's
5 external vaginal area with his fingers and criticized her for having a "hairy vagina." The
6 comment made Plaintiff JANE DOE #54 feel ashamed and embarrassed, as she had not
7 considered the need to groom her vaginal hair for her gynecological appointment.
8

9 215. During another appointment, BROCK gave Plaintiff JANE DOE #54 a vaginal
10 exam. Afterward, without warning or explanation, he aggressively and roughly inserted multiple
11 fingers into her rectum, causing Plaintiff JANE DOE #54 to experience severe pain. Plaintiff
12 JANE DOE #54 felt so shocked that she let out a small scream.

13 216. Plaintiff JANE DOE #54 was otherwise healthy and did not know why she
14 would need a rectal exam, however, she trusted BROCK and thought he was simply conducting
15 a thorough exam. She now realizes the exam was unnecessary and conducted in a way that was
16 inappropriate and devoid of medical legitimacy.
17

18 217. Chaperones were not present to witness Plaintiff JANE DOE #54's exams,
19 only further solidifying to Plaintiff that BROCK's conduct was inappropriate.
20

21 218. It was not until recently that Plaintiff JANE DOE #54 realized that BROCK's
22 behavior constituted a sexual assault. As a result of that realization, Plaintiff JANE DOE #54
23 has suffered significant emotional upset and can now only bring herself to see female
24 gynecologists.

25 **J. Specific Factual Allegations - JANE DOE #55**

26 219. When Plaintiff JANE DOE #55 found out that she was pregnant in 2009, she
27 made an appointment with CEDARS SINAI MEDICAL GROUP because she wanted to deliver
28

1 her baby at CEDARS. She understood that CEDARS had a reputation for providing the very
2 best healthcare available in southern California. She placed her trust and confidence in BROCK,
3 believing that the healthcare providers at CEDARS, and BROCK, in particular, were trustworthy
4 and skilled and could ensure a successful gestation and delivery.

5 220. Plaintiff JANE DOE #55 implicitly trusted the physicians and staff at
6 CEDARS. BROCK garnered her trust and confidence which he then took advantage of in order
7 to sexually abuse and harass her
8

9 221. Plaintiff JANE DOE #55 was under BROCK'S and CEDARS' care from 2009
10 through 2015, during which time she delivered two babies, and suffered a miscarriage.

11 222. When Plaintiff JANE DOE #55 first went to CEDARS SINAI MEDICAL
12 GROUP in 2009, she did not know what to expect during a pre-natal visit. The vaginal exam
13 BROCK performed was very aggressive and was also much longer than she was used to.
14 BROCK performed this very rough and lengthy vaginal exam under the guise of "checking her
15 cervix." At first, Plaintiff JANE DOE #55 told herself that maybe BROCK'S hands were just
16 very large, and that she was being too sensitive. Because BROCK performed very rough, overly-
17 lengthy (and what she now knows to have been sexually abusive) vaginal exams at all, or nearly
18 all of her visits, Plaintiff JANE DOE #55 was led to believe that "pre-natal" exams were supposed
19 to be performed in this manner.
20

21 223. During the time that she was a patient of BROCK'S, Plaintiff JANE DOE #55
22 was lulled into the belief that she was being provided with high quality pre-natal care by a skilled
23 obstetrician and gynecologist, while she now knows that she was being sexually harassed,
24 assaulted and abused by him.
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1 224. During the time that she was a patient of BROCK's, he also performed what
2 Plaintiff JANE DOE #55 now knows to have been sexually abusive breast exams. BROCK
3 would use both of his hands at the same time to "examine" her breasts. BROCK would also
4 spend what she now knows to have been far too long "examining" her breasts in this manner. At
5 the time, again, Plaintiff JANE DOE #55 was lulled into believing that she was being provided
6 high quality, pre-natal care by a skilled obstetrician and gynecologist at a reputable clinic, while
7 she now knows that she was being sexually harassed, assaulted and abused by BROCK.
8

9 225. BROCK kept Plaintiff JANE DOE #55 off balance and not sure of herself
10 during her exams. BROCK told her to "stop eating," and that she was "getting so fat." BROCK
11 also frequently touched Plaintiff JANE DOE #55 in non-medically necessary ways. He would
12 put a hand on her shoulder, or upper thigh when he was talking to her, which she now realizes
13 distracted her from the more aggressive sexual actions and liberties BROCK was taking with her
14 during her appointments.
15

16 226. During her exams, nurses were sometimes present and sometimes not. The
17 presence of nurses in the room while BROCK was performing vaginal and breast exams gave
18 Plaintiff JANE DOE #55 the false sense that she was receiving appropriate medical care from
19 this reputable clinic.
20

21 227. Plaintiff JANE DOE #55 now knows that the frequency, the length, the
22 forcefulness of her vaginal exams, along with the fondling nature of her breast exams, were
23 unnecessary and that these exams were performed in a non-medical manner. Plaintiff JANE
24 DOE #55 also now knows that BROCK's comments were not relevant, nor were they a part of
25 legitimate healthcare, but were meant to keep her off balance so that he could more easily take
26 advantage of her to sexually harass and abuse her and gratify himself.
27
28

1 228. When Plaintiff JANE DOE #55 learned that BROCK was being sued for his
2 sexually harassing, abusive, and unprofessional conduct involving patients, she realized that
3 what he did to her over the course of the nearly six (6) years that she was his patient was sexually
4 abusive.

5 229. Because BROCK took advantage of Plaintiff JANE DOE #55 during these very
6 vulnerable exams to abuse her, Plaintiff JANE DOE #55 has experienced feelings of betrayal,
7 humiliation, depression and anxiety, which have resulted in physical manifestations of that
8 distress including sleeplessness and lack of focus.

9
10 **K. Specific Factual Allegations – JANE DOE #56**

11 230. Plaintiff JANE DOE #56 is an adult woman and was an OB/GYN patient of
12 CORPORATE DEFENDANTS and BROCK from approximately 2020 through 2021.

13 231. Plaintiff JANE DOE #56 sought prenatal care from BROCK throughout the
14 course of her pregnancy.

15 232. Plaintiff JANE DOE # 56 trusted CORPORATE DEFENDANTS and BROCK
16 to provide her with legitimate and medically necessary care. BROCK violated this trust and
17 confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #56.

18 233. Plaintiff JANE DOE #56 was routinely denied a privacy dressing gown at her
19 prenatal appointments with BROCK.

20 234. On one occasion, BROCK lifted Plaintiff JANE DOE #56's street clothes to
21 begin the appointment and made a comment that he "loved [patients] skinny."

22 235. BROCK frequently performed penetrative vaginal examinations at these
23 prenatal appointments, and subjected Plaintiff JANE DOE #56 to duplicative vaginal
24 examinations several times a week towards the end of her pregnancy.

1 236. During one such examination, Plaintiff JANE DOE #56 complained to BROCK
2 that she had experienced discomfort during sexual intercourse with her husband.

3 237. In response, BROCK inserted two (2) fingers into Plaintiff JANE DOE #56's
4 vagina and began moving them inside her body.

5 238. BROCK told Plaintiff JANE DOE #56 her that her body was "reacting" and
6 "responding well" to his contact and encouraged her to tell her husband to mimic BROCK's
7 actions during sex.
8

9 239. Plaintiff JANE DOE #56 was not provided a chaperone for any of her prenatal
10 visits with BROCK.

11 240. Plaintiff JANE DOE #56 delivered her child at CEDARS-SINAI on or about
12 March 15, 2021, with BROCK as her obstetrician.

13 241. Throughout the course of her pregnancy and prenatal appointments with
14 BROCK, Plaintiff JANE DOE #56 emphasized that she did not want to deliver her child on her
15 back and preferred alternate labor positions. BROCK assured her this would be no problem, and
16 that she could labor however she wanted.
17

18 242. While laboring on her hands and knees, BROCK grabbed Plaintiff JANE DOE
19 #56's legs and forcibly flipped her over onto her back, causing Plaintiff JANE DOE # to
20 experience shock and discomfort.
21

22 243. Based on CORPORATE DEFENDANTS' and BROCK's representations and
23 reputation, Plaintiff JANE DOE #56 was lulled into the belief that she was being provided
24 legitimate obstetrical care.
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1 244. Upon learning that BROCK was being sued for sexual misconduct involving
2 patients, Plaintiff JANE DOE #56 realized BROCK's conduct was in fact sexually abusive,
3 assaultive, and/or harassing.

4 245. Plaintiff JANE DOE #56 now knows that her examinations were performed in
5 a non-medical manner and for BROCK's own sexual gratification.

6 246. Plaintiff JANE DOE #56 also now knows that the sexually harassing comments
7 were intended to embarrass, degrade, and distract Plaintiff JANE DOE #56 from the
8 inappropriate nature of BROCK's conduct.

9 247. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #56 has
10 experienced significant emotional distress and feelings of betrayal, humiliation, and
11 embarrassment.

12
13 **L. Specific Factual Allegations - JANE DOE #57**

14 248. Plaintiff JANE DOE #57 is an adult woman and was an OB/GYN patient of
15 CORPORATE DEFENDANTS and BROCK from approximately 1994 until approximately
16 2015.

17 249. Plaintiff JANE DOE #57 saw BROCK for both obstetrical and gynecologic
18 appointments over the course of more than twenty (20) years.

19 250. Plaintiff JANE DOE #57 trusted CORPORATE DEFENDANTS and BROCK
20 to provide her with legitimate and medically necessary care. BROCK violated this trust and
21 confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #57.

22 251. During appointments with BROCK, Plaintiff JANE DOE #57 was given a
23 privacy gown that opened down the middle, leaving her fully exposed for the duration of her
24 examination with BROCK.

1 252. BROCK would frequently perform prolonged breast examinations, using both
2 ungloved hands to caress Plaintiff JANE DOE #57's breasts and touch her areolas.

3 253. During pelvic examinations and with Plaintiff JANE DOE #57's legs in the
4 stirrups, BROCK would pat and rub her inner thighs.

5 254. Moreover, prior to inserting the speculum for pelvic examinations, BROCK
6 would unnecessarily use two fingers to touch Plaintiff JANE DOE #57's labia.

7 255. Throughout the entirety of these "exams", BROCK would refer to Plaintiff
8 JANE DOE #57 as "sweetheart."

9 256. Based on CORPORATE DEFENDANTS' and BROCK's representations and
10 reputation, Plaintiff JANE DOE #57 was lulled into the belief that she was being provided
11 legitimate gynecologic care.

12 257. Upon learning that BROCK was being sued for sexual misconduct involving
13 patients, Plaintiff JANE DOE #57 realized BROCK's conduct was in fact sexually abusive,
14 assaultive, and/or harassing.

15 258. Plaintiff JANE DOE #57 now knows that her examinations were performed in
16 a non-medical manner and for BROCK's own sexual gratification.

17 259. Plaintiff JANE DOE #57 also now knows that the sexually harassing comments
18 were intended to embarrass, degrade, and distract Plaintiff JANE DOE #57 from the
19 inappropriate nature of BROCK's conduct.

20 260. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #57 has
21 experienced significant emotional distress and feelings of betrayal, humiliation, and
22 embarrassment.

M. Specific Factual Allegations - JANE DOE #58

261. Plaintiff JANE DOE #58 is an adult woman and was an OB/GYN patient of CORPORATE DEFENDANTS and BROCK in approximately 2020.

262. Plaintiff JANE DOE #58 was recommended by a friend to see BROCK at RODEO DRIVE for gynecologic care while trying to get pregnant.

263. Plaintiff JANE DOE #58 trusted CORPORATE DEFENDANTS and BROCK to provide her with legitimate and medically necessary care. BROCK violated this trust and confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #58.

264. Plaintiff JANE DOE #58 was provided with a privacy gown at the time of her appointment; however, BROCK opened the gown and left Plaintiff JANE DOE #58 completely exposed for the duration of her appointment.

265. BROCK then performed a breast “examination” and pinched and stimulated Plaintiff JANE DOE #58’s nipples and fondled her breasts.

266. When discussing Plaintiff JANE DOE #58 and her husband’s efforts to conceive, BROCK inappropriately commented that Plaintiff JANE DOE #58 should “wear something cute” and have intercourse with her husband without mentioning fertility as “guys can’t perform under pressure.”

267. Plaintiff JANE DOE #58 was not provided with a chaperone during appointments with BROCK at RODEO DRIVE.

268. Based on CORPORATE DEFENDANTS’ and BROCK’s representations and reputation, Plaintiff JANE DOE #58 was lulled into the belief that she was being provided with legitimate medical care.

1 269. Upon learning that BROCK was being sued for sexual misconduct involving
2 patients, Plaintiff JANE DOE # 58 realized BROCK's conduct was in fact sexually abusive,
3 assaultive, and/or harassing.

4 270. Plaintiff JANE DOE #58 now knows that her examinations were performed in
5 a non-medical manner and for BROCK's own sexual gratification.

6 271. Plaintiff JANE DOE #58 also now knows that the sexually harassing comments
7 were intended to embarrass, degrade, and distract Plaintiff JANE DOE #58 from the
8 inappropriate nature of BROCK's conduct.

9 272. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #58 has
10 experienced significant emotional distress and feelings of betrayal, humiliation, and
11 embarrassment. These feelings have resulted in a distrust towards male physicians.

12
13 **N. Specific Factual Allegations - JANE DOE #59**

14 273. Plaintiff JANE DOE #59 is an adult woman and was an OB/GYN patient of
15 CORPORATE DEFENDANTS and BROCK from approximately 1999 until approximately
16 2009.

17 274. Plaintiff JANE DOE #59 was referred to BROCK and CEDARS-SINAI
18 MEDICAL GROUP by her primary care physician for treatment related to uterine fibroids.

19 275. During an initial appointment with BROCK, Plaintiff JANE DOE #59 indicated
20 that she was a virgin, was not married, and was considering hysterectomy as treatment for her
21 recurrent uterine fibroids, as she had no intention of having children.

22 276. In this discussion, BROCK discouraged Plaintiff JANE DOE 59# and stated
23 "you are too young and beautiful to not have kids. I'm going to find someone to have sex with
24 you and give you children."
25
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1 277. This comment was made by BROCK while performing an aggressive digital
2 vaginal examination, during which he removed and re-inserted his fingers into Plaintiff JANE
3 DOE #59's vagina.

4 278. Throughout Plaintiff JANE DOE #59's "treatment" with BROCK, BROCK
5 frequently and casually touched her body, often resting his hands on her legs while performing
6 intimate examinations.

7 279. Plaintiff JANE DOE #59 further recalls BROCK making frequent (and what
8 she now knows to have been inappropriate) comments during the numerous gynecological
9 examinations he performed.

10 280. Based on CEDARS-SINAI MEDICAL GROUP and BROCK's representations
11 and reputation, Plaintiff JANE DOE #59 was lulled into the belief that she was being provided
12 with legitimate medical care.

13 281. Upon learning that BROCK was being sued for sexual misconduct involving
14 patients, Plaintiff JANE DOE #59 realized BROCK's conduct was in fact sexually abusive,
15 assaultive, and/or harassing.

16 282. Plaintiff JANE DOE #59 now knows that her examinations were performed in
17 a non-medical manner and for BROCK's own sexual gratification.

18 283. Plaintiff JANE DOE #59 also knows that the sexually harassing comments
19 were intended to embarrass, degrade, and distract Plaintiff JANE DOE #59 from the
20 inappropriate nature of BROCK's conduct.

21 284. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #59 has
22 experienced significant emotional distress and feelings of betrayal, humiliation, and
23 embarrassment.

O. Specific Factual Allegation – JANE DOE #60

285. Plaintiff JANE DOE #60 is an adult woman and was an OB/GYN patient of CORPORATE DEFENDANTS and BROCK in approximately 2020.

286. Plaintiff JANE DOE #60 was referred to BROCK by a friend for treatment of abdominal pain.

287. Plaintiff JANE DOE #60 trusted CORPORATE DEFENDANTS and BROCK to provide her with legitimate and medically necessary care. BROCK violated this trust and confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #60.

288. On the date of the subject incident, Plaintiff JANE DOE #60 was seen by BROCK for an emergency visit early in the morning for sudden onset of intense abdominal pain.

289. Upon meeting BROCK, Plaintiff JANE DOE #60 thanked him for accommodating her at the last minute. BROCK responded by looking Plaintiff JANE DOE #60 up and down and saying, “I always make time for my good-looking patients.”

290. Despite Plaintiff JANE DOE # 60 presenting with complaints of abdominal pain, BROCK insisted on performing a breast examination and used both hands simultaneously to “examine” Plaintiff JANE DOE #60’s breasts.

291. After physical examination, BROCK dismissed Plaintiff JANE DOE #60’s abdominal pain as “cramps” despite Plaintiff JANE DOE #60’s insistence that something was wrong and left the examination room to obtain birth control pills.

292. When BROCK returned to the examination room, Plaintiff JANE DOE #60 became emotional and insisted that her pain was more than just cramps and requested an ultrasound.

1 293. While Plaintiff JANE DOE #60 cried, BROCK approached the exam table and
2 spread Plaintiff JANE DOE #60's legs apart so he could stand in between them, then placed his
3 hands on her shoulders and said, "for you, I'll do it."

4 294. Plaintiff JANE DOE #60 was then escorted to an ultrasound room, and Plaintiff
5 JANE DOE #60 confided to the ultrasound technician that BROCK's conduct made her feel
6 uncomfortable, which the ultrasound technician laughed off and attributed to BROCK's
7 personality.
8

9 295. While Plaintiff JANE DOE #60 was being administered a transvaginal
10 ultrasound, BROCK entered the ultrasound room to talk and joke with the ultrasound technician,
11 causing Plaintiff JANE DOE #60 to feel uncomfortable and exposed.

12 296. During the ultrasound, it was revealed that Plaintiff JANE DOE #60's
13 abdominal pain was not cramps, as BROCK suggested; rather, an ovarian cyst had burst.
14

15 297. Plaintiff JANE DOE #60 left an online review after her appointment outlining
16 BROCK's conduct, and while an employee/agent of CORPORATE DEFENDANTS left
17 Plaintiff JANE DOE #60 a voicemail regarding the contents of her review, Plaintiff JANE DOE
18 #60's further attempts to discuss her claim were ignored.

19 298. Based on BROCK's representations and reputation, and CORPORATE
20 DEFENDANT's disregard of her complaints, Plaintiff JANE DOE #60 was lulled into the belief
21 that BROCK's conduct was medically necessary, and she was being provided legitimate
22 gynecologic care.
23

24 299. Upon learning that BROCK was being sued for sexual misconduct involving
25 patients, Plaintiff JANE DOE #60 realized BROCK's conduct was in fact sexually abusive,
26 assaultive, and/or harassing.
27
28

1 300. Plaintiff JANE DOE #60 now knows that the physical examination was
2 performed in a non-medical manner and for BROCK's own sexual gratification.

3 301. Plaintiff JANE DOE #60 also now knows that the sexually harassing comments
4 were intended to embarrass, degrade, and distract Plaintiff JANE DOE #60 from the
5 inappropriate nature of BROCK's conduct.

6 302. Because of BROCK's sexual misconduct, Plaintiff JANE DOE #60 has
7 experienced significant emotional distress and feelings of betrayal, humiliation, and
8 embarrassment which have manifested itself in a distrust of male medical providers and has
9 prevented her from seeking further gynecologic care
10

11 **P. Specific Factual Allegations - JANE DOE #61**

12 303. Plaintiff JANE DOE #61 # is an adult woman and was an OB/GYN patient of
13 CORPORATE DEFENDANTS and BROCK from approximately 1983 until approximately
14 2017. Plaintiff JANE DOE #61 saw BROCK for annual gynecological examinations and
15 gynecologic care for a period of over thirty (30) years.
16

17 304. Plaintiff JANE DOE #61 trusted CORPORATE DEFENDANTS and BROCK
18 to provide her with legitimate and medically necessary care. BROCK violated this trust and
19 confidence to sexually abuse, assault, and/or harass Plaintiff JANE DOE #61.

20 305. During the course of over thirty (30) years, at every annual gynecological
21 examination with BROCK, JANE DOE #61 was subjected to lengthy and aggressive manual
22 pelvic examinations that were much longer than Plaintiff had previously experienced (or now
23 experiences with a female doctor). After the pap smear, BROCK would spend an extended
24 period of time with his fingers to "inspect" Plaintiff's vagina in a circular manner, and with his
25 fingers still in her vagina, he would stand up and press against Plaintiff JANE DOE #61's clitoris.
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1 306. After the manual pelvic examination, BROCK would digitally examine
2 Plaintiff JANE DOE #61's anus and rectum without warning or explanation and in a forceful,
3 aggressive, and (she now realizes) sexual manner.

4 307. Plaintiff JANE DOE #61 had not undergone digital rectal examinations in prior
5 routine gynecologic examinations; however, BROCK insisted such examinations were
6 "necessary". These forceful, aggressive, and (she now realizes) sexual rectal examinations
7 ceased in or about 2014 once Plaintiff JANE DOE #61 demanded that BROCK stop due to her
8 physical discomfort.

9 308. Annual examinations with BROCK also involved extended breast
10 examinations, with both hands and without gloves for a much longer period of time than Plaintiff
11 had previously experienced (or now experiences with a female doctor). During these exams
12 BROCK would compliment Plaintiff JANE DOE #61's breasts and touch, squeeze, and pinch
13 her nipples in what Plaintiff JANE DOE #61 now understands to be a sexual manner with his
14 ungloved hands. These examinations were initiated while Plaintiff JANE DOE #61 was lying on
15 the exam table, then BROCK would have Plaintiff JANE DOE #61 sit up and reexamine her
16 breasts. On early occasions when he pinched her nipples, BROCK claimed he was checking for
17 discharge under the guise of legitimate examination. Later, BROCK offered no explanation for
18 his conduct.

19 309. Throughout Plaintiff JANE DOE #61's thirty (30) plus years as a patient, at
20 every appointment with BROCK, BROCK would inappropriately compliment Plaintiff JANE
21 DOE #61's physical appearance, frequently commenting on her "great breasts" and "great
22 body". BROCK's words were said with what Plaintiff JANE DOE #61 now understands was a
23 sexually suggestive smile or smirk. The "great body" comments would be made after BROCK
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1 digitally examined Plaintiff JANE DOE #61's vagina, and the "great breasts" comments were
2 made after the extended breast examinations.

3 310. In what Plaintiff JANE DOE #61 believes now to be attempts at legitimizing
4 his inappropriate commentary, BROCK would discuss Plaintiff JANE DOE #61's prospective
5 long-term breast health based on her breast shape and position, which he posited made her less
6 prone to develop breast cancer. In other words, Brock covered over and distracted Plaintiff JANE
7 DOE #61 from his sexual comments and contact by talking about cancer risk and making (what
8 Plaintiff JANE DOE #61 now knows to be) sexually inappropriate conduct and comments appear
9 to be relevant to her medical care.
10

11 311. Moreover, BROCK frequently touched Plaintiff JANE DOE #61 in a
12 nonmedical manner at these appointments. This included touching Plaintiff JANE DOE #61's
13 inner thighs during pelvic examinations and a hug at the conclusion of appointments.
14

15 312. At one routine visit with BROCK in or about April 2017, Plaintiff JANE DOE
16 #61 told him that she was experiencing light vaginal spotting, but believed the cause of the
17 spotting to be stress and/or increased aspirin intake and not a more serious condition. BROCK
18 immediately insisted that a dilation and curettage ("D&C") was necessary. Plaintiff JANE DOE
19 #61 felt pressured and that she had no choice but to rely on BROCK's clinical judgment and
20 expertise, and agreed to undergo the D&C.
21

22 313. On or about April 22, 2017, Plaintiff JANE DOE #61 presented for her D&C
23 with Brock. Immediately after an epidural was administered, BROCK ordered that Plaintiff
24 JANE DOE #61's legs be placed in "candy cane" stirrups. On information and belief, such
25 stirrups are usually reserved for gynecological surgeries under general anesthesia as they are
26 very uncomfortable, degrading and constraining. When her legs were placed in these stirrups
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1 while she was conscious, Plaintiff JANE DOE #61 experienced significant physical discomfort,
2 humiliation, and emotional distress related to these restraints. Plaintiff JANE DOE #61 wanted
3 to speak up immediately, but struggled to do so as she had been given medication purportedly
4 to “relax” her and she thus felt particularly powerless and trapped. BROCK then began the D&C
5 procedure (and aggressively maneuvered Plaintiff JANE DOE #61’s body) without allowing
6 adequate time for the epidural to take effect, causing severe pain. Plaintiff JANE DOE #61
7 finally found the strength to demand that her legs be removed from the candy cane stirrups,
8 which Brock initially resisted, only relenting after a long back and forth. In about 1987, Plaintiff
9 JANE DOE #61 had had a D&C (with an epidural). That D&C was routine in nature and done
10 in a way as to minimize pain, used traditional stirrups, and wherein she was treated with dignity.
11

12 314. Ultimately, the traditional stirrups were retrieved, clamped to the operating
13 table and Plaintiff JANE DOE #61 placed her legs and feet in the stirrups. Plaintiff JANE DOE
14 #61 felt unnecessarily emotionally stressed and degraded by what had just happened, thus
15 Plaintiff JANE DOE #61 then asked for additional anesthesia. Plaintiff JANE DOE #61 felt
16 uncomfortable, humiliated, and physically violated after she underwent this D&C.
17

18 315. Plaintiff JANE DOE #61 suffered from ongoing emotional distress such that
19 she was unable to seek gynecological care for several years and had recurring flashbacks, PTSD
20 and nightmares about this painful and humiliating incident, in addition to the thirty (30) plus
21 years of having been aggressively handled in a manner that Plaintiff now realizes was sexually
22 inappropriate and unnecessarily lengthy.
23

24 316. Following this incident, Plaintiff JANE DOE #61 stopped treatments with
25 BROCK. Looking back, Plaintiff JANE DOE #61 now believes that BROCK intentionally
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1 inflicted pain and humiliation on her – while she was physically restrained and powerless—for
2 his own sadistic sexual gratification.

3 317. Based on CORPORATE DEFENDANTS’ and BROCK’s representations and
4 reputation, Plaintiff JANE DOE #61 was lulled into the belief that BROCK’s conduct was at all
5 times medically necessary, and that she was being provided with legitimate gynecological care.
6

7 318. Upon learning that BROCK is being sued for sexual misconduct involving
8 patients, Plaintiff JANE DOE #61 realized BROCK’s conduct was in fact sexually abusive,
9 assaultive, and/or harassing.

10 319. Plaintiff JANE DOE #61 now knows that her examinations and procedures
11 were performed in a non-medical manner and for BROCK’s own sexual gratification. Plaintiff
12 JANE DOE #61 also now knows that BROCK’s sexually harassing comments were intended to
13 degrade and distract from his improper conduct.
14

15 320. Because of BROCK’s sexual misconduct, Plaintiff JANE DOE #61 has
16 experienced significant emotional distress and feelings of discomfort, betrayal, humiliation, self-
17 doubt, and embarrassment.

18 **CAUSES OF ACTION BY ALL PLAINTIFFS**

19
20 **FIRST CAUSE OF ACTION**
VIOLATION OF UNRUH ACT
Cal. Civ. Code § 51 *et seq*
(Against All DEFENDANTS)

21
22 321. The Plaintiffs re-state and incorporate by reference herein each and every
23 allegation contained herein above as though fully set forth and brought in this cause of action.
24

25 322. “All persons within the jurisdiction of this state have the right to be free from
26 any violence, or intimidation by threats of violence, committed against their persons or property”
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1 on the basis of a protected status including sex, ancestry, national origin, disability, or medical
2 condition. Cal. Civ. Code §§ 51(b) and 51.7.

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

5 324. BROCK violated Plaintiffs' civil rights when through his physician patient
6 relationship with each Plaintiff, he made sexual advances, sexual requests, and/or engaged in
7 verbal, visual and/or physical conduct of a sexual and/or hostile nature on the basis of Plaintiffs'
8 gender. BROCK'S conduct was unwelcome. Plaintiffs were unable to terminate the relationship
9 with BROCK.
10

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

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

19 327. DEFENDANTS were acting under the color of their authority and in the scope
20 of their employment when Plaintiffs were sexually exploited and abused by BROCK as patients
21 at DEFENDANTS' medical facilities where BROCK worked and/or maintained hospital or
22 clinical privileges.

23 328. The CORPORATE DEFENDANTS herein denied Plaintiffs full and equal
24 accommodations, advantages, facilities, privileges, and healthcare services because of their
25 identity as females, by allowing BROCK unfettered access to sexually abuse Plaintiffs, by and
26 through his position of trust and authority given to him, and maintained, by the CORPORATE
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1 DEFENDANTS. There is no justification or legitimate business reason for allowing such
2 sexually destructive discrimination to stand.

3 329. Further, CORPORATE DEFENDANTS' collective retention of BROCK
4 denied Plaintiffs, and all of their other female patients, full and equal access to safe medical
5 facilities, treatment, and services, based upon their gender. By actively concealing BROCK'S
6 history and reputation as a serial sexual predator, the CORPORATE DEFENDANTS enabled
7 and ratified his misconduct.

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

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

17 332. As a further direct and proximate result of CORPORATE DEFENDANTS'
18 collective and concerted wrongful actions, as herein alleged, Plaintiffs have suffered, and
19 continue to suffer, great pain of mind and body, shock, emotional distress, certain physical
20 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation,
21 and grief in an amount according to proof at trial but in no event less than the jurisdictional
22 minimum requirements of this Court.

23 333. As a further direct and proximate result of CORPORATE DEFENDANTS'
24 wrongful actions, as herein stated, Plaintiffs are entitled to damages as set forth in Cal. Civ. Code
25 § 52, including special and general damages to be determined by a jury, and attorneys' fees as
26 may be determined by the Court.

27 334. The conduct of CORPORATE DEFENDANTS was oppressive, malicious, and
28 despicable in that it was intentional and done in conscious disregard for the rights and safety of

1 others, and was carried out with a conscious disregard of Plaintiffs' right to be free from such
2 tortious behavior, such as to constitute oppression, fraud or malice pursuant to Cal. Civ. Code §
3 3294, entitling Plaintiffs to punitive damages against CORPORATE DEFENDANTS in the
4 amount appropriate to punish and set an example of each and every DEFENDANT, both
5 individually and in the collective.

6 **SECOND CAUSE OF ACTION**
7 **VIOLATION OF THE BANE ACT**
8 **Cal. Civ. Code § 52.1**
9 ***(Against All DEFENDANTS)***

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

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

15 337. BROCK intentionally interfered with Plaintiffs' civil rights to receive safe
16 medical treatment by requiring unfettered access to their bodies, including their most intimate
17 female parts for his sexual gratification, under the guise of medical intervention and treatment
18 in violation of Cal. Civ. Code § 52.1. BROCK'S access to Plaintiffs was achieved through
19 coercion because Plaintiffs were unaware of his sexually motivated contacts; and Plaintiffs relied
20 on BROCK'S good standing with some of the most reputable medical institutions worldwide in
21 seeking gynecological care. BROCK forced Plaintiffs to expose their naked bodies while he
22 engaged in idle conversation, subjected them to repeated unnecessary vaginal, breast, and rectal
23 exams, and met them with the malicious mutilation of their intimate parts after childbirth without
24 consent.

25 338. During Plaintiffs' time as patients of CORPORATE DEFENDANTS,
26 DEFENDANTS engaged in oppressive and unlawful tactics by ignoring, concealing, and
27 ultimately suppressing the Plaintiffs' reports and complaints of being sexually exploited and
28 abused by DEFENDANT BROCK. These intentional acts of concealment by CORPORATE
DEFENDANTS, of DEFENDANT BROCK'S exploitative and abusive behavior, violated the

1 Plaintiffs' right to be free from discrimination on the basis of their gender under California State
2 Law.

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

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

15 341. CORPORATE DEFENDANTS unlawfully and wrongfully used, or employed
16 others to wrongfully use, threats, intimidation, harassment, violence, and coercion over
17 Plaintiffs' persons, to which Plaintiffs, who did not have knowledge that the conduct in which
18 CORPORATE DEFENDANTS were engaging was not medically necessary, had no relief
19 except to submit to the DEFENDANTS' wrongful threats, intimidation, harassment, violence,
20 and coercion, which rendered Plaintiffs' submission involuntary.

21 342. The CORPORATE DEFENDANTS actions and misconduct were the legal and
22 proximate causes of physical, psychological, emotional, and economic damages, and damage to
23 Plaintiffs herein, who have suffered and continue to suffer to this day. The actions and
24 misconduct of CORPORATE DEFENDANTS have also resulted in Plaintiffs incurring, and will
25 require them to incur into the future, expenses for medical and psychological treatment, therapy
26 and counseling.

27 343. In subjecting Plaintiffs to the wrongful treatment described herein,
28 CORPORATE DEFENDANTS acted willfully and maliciously with the intent to harm

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

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

14 **THIRD CAUSE OF ACTION**
15 **GENDER VIOLENCE**
16 **Cal. Civ. Code § 52.4**
17 ***(Against all DEFENDANTS)***

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

20 346. California Civil Code § 52.4 provides that gender violence is a form of sexual
21 discrimination and includes a "physical intrusion or physical invasion of a sexual nature under
22 coercive conditions. . ." Cal. Civ. Code § 52.4(c)(2). For purposes of this section, "gender"
23 means "sex, and includes a person's gender identity and gender expression." Cal. Civ. Code
24 § 52.4(d); Cal. Civ. Code § 51. The provision further provides that any person subjected to
25 gender violence may bring a civil action for damages against any responsible party, and may
26 seek actual, compensatory, and punitive damages therefore, or any other appropriate relief.

27 347. All Plaintiffs herein are female.

28 348. BROCK intentionally and without consent physically intruded and/or invaded
Plaintiffs' bodies during medical examinations in a sexual manner in violation of Cal. Civ. Code

1 § 52.4. BROCK'S sexual contact was coercive by virtue of Plaintiffs' intensified need to place
2 their trust and confidence in BROCK as a physician held out as specializing in gynecological
3 care within the CORPORATE DEFENDANTS' networks as a premier provider of patient care.

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

11 350. DEFENDANT BROCK carried out such actions and conduct as an employee,
12 agent, and/or representative of CORPORATE DEFENDANTS which provide medical treatment
13 to the public.

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

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

28 353. CORPORATE DEFENDANTS' above-referenced actions were the legal and

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

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

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

15 **FOURTH CAUSE OF ACTION**
16 **SEXUAL HARASSMENT**
17 **Cal. Civ. Code § 51.9**
(Against All DEFENDANTS)

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

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

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

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

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

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

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

25 362. Even though the CORPORATE DEFENDANTS knew or should have known
26 of these pervasive, illegal, and inappropriate activities by BROCK, CEDARS-SINAI nor any of
27 the other CORPORATE DEFENDANTS financially benefitting from BROCK, did anything to
28 investigate, supervise, or monitor BROCK to ensure the safety of the patients in their charge.

1 Nor did CORPORATE DEFENDANTS put in place — or enforce — safeguards to prevent
2 foreseeable harm to female gynecological patients, including imposition of a policy providing
3 for the mandatory presence of an independent and properly trained chaperone, to prevent, deter,
4 and report any misconduct in the context of gynecological examinations and procedures.
5 CORPORATE DEFENDANTS also failed adequately (or at all) to hire appropriate chaperones
6 or train its employees and agents in how to recognize and report any sexual or medical battery
7 or harassment.

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

15 364. CORPORATE DEFENDANTS’ conduct (and the conduct of their agents,
16 servants, and/or employees) was a breach of their duties to Plaintiffs.

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

24 366. The conduct of BROCK and CORPORATE DEFENDANTS was oppressive,
25 malicious, and despicable in that it was intentional and done in conscious disregard for the rights
26 and safety of others, and was carried out with a conscious disregard of Plaintiffs’ right to be free
27 from such tortious behavior, such as to constitute oppression, fraud or malice pursuant to Cal.
28 Civ. Code § 3294, entitling Plaintiffs to punitive damages against DEFENDANTS in an amount

1 appropriate to punish and set an example of each and every DEFENDANT, both individually
2 and in the collective.

3 **FIFTH CAUSE OF ACTION**
4 **SEXUAL ASSAULT**
(Against All DEFENDANTS)

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

7 368. DEFENDANT BROCK, in doing the things herein alleged, including intending
8 to subject Plaintiffs to numerous instances of sexual abuse and molestation during their time in
9 the care of CORPORATE DEFENDANTS and BROCK were intended to cause harmful or
10 offensive contact with Plaintiffs, or intended to put Plaintiffs in imminent apprehension of such
11 contact.

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

15 370. Plaintiffs did not consent to BROCK'S intended harmful or offensive contact
16 with Plaintiffs.

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

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

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

27 374. Plaintiffs are informed and based thereon state that the conduct of
28 DEFENDANTS was oppressive, malicious, and despicable in that it was intentional and done in

1 conscious disregard for the rights and safety of others, and were carried out with a conscious
2 disregard of their right to be free from such tortious behavior, such as to constitute oppression,
3 fraud, or malice pursuant to Cal. Civ. Code § 3294, entitling Plaintiffs to punitive damages
4 against DEFENDANTS in an amount appropriate to punish and set an example of
5 DEFENDANTS.

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

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

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

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

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

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

1 permitted such sexual contact by BROCK.

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

5 381. The CORPORATE DEFENDANTS are vicariously liable for the conduct
6 alleged herein because, even though the CORPORATE DEFENDANTS knew of these
7 pervasive, illegal, and inappropriate activities by BROCK, the CORPORATE DEFENDANTS
8 did nothing to investigate, supervise, or monitor BROCK to ensure the safety of the patients in
9 his charge. Nor did CORPORATE DEFENDANTS put in place — or enforce — safeguards to
10 prevent foreseeable harm to female gynecological patients, including imposition of any policy
11 providing for the mandatory presence of a properly-trained independent chaperone, to prevent,
12 deter, and report any misconduct in the context of gynecological examinations and procedures.

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

18 383. By engaging in the misconduct alleged herein, BROCK used the power and
19 authority conferred upon him by the CORPORATE DEFENDANTS to gain access to patients
20 such as Plaintiffs. It is predictable and foreseeable, given the CORPORATE DEFENDANTS'
21 knowledge of BROCK'S prior misconduct and its negligent supervision of BROCK, and failure
22 to put in place — or enforce — safeguards to prevent foreseeable harm to female gynecological
23 patients, that someone in BROCK'S position would abuse the power and authority
24 CORPORATE DEFENDANTS conferred upon him while engaging in assaultive conduct.

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

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

7 386. As a direct result of the sexual exploitation and abuse by BROCK, and
8 CORPORATE DEFENDANTS, Plaintiffs have difficulty in reasonably and/or meaningfully
9 interacting with others, including those in positions of authority over them such as doctors, and
10 in intimate, confidential, and familial relationships, due to the trauma of the sexual abuse
11 inflicted upon them by DEFENDANTS. This inability to interact creates conflict with Plaintiffs'
12 values of trust and confidence in others, has caused Plaintiffs substantial emotional distress,
13 anxiety, nervousness, and fear. As a direct result of the sexual abuse and molestation by
14 BROCK, Plaintiffs suffered immensely, including, but not limited to, encountering issues with
15 a lack of trust, various psychological sequelae, depressive symptoms, anxiety, nervousness, and
16 self-medicating behavior.

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

24 **SEVENTH CAUSE OF ACTION**
25 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
26 ***(Against All DEFENDANTS)***

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

 389. DEFENDANTS intentional conduct toward Plaintiffs, as described herein, was

1 outrageous and extreme, particularly as part of a trusted physician-patient relationship.
2 DEFENDANTS' conduct exceeded all bounds of decency.

3 390. A reasonable person would not expect or tolerate the sexual harassment,
4 exploitation, molestation, and abuse of Plaintiffs by BROCK, nor tolerate or expect the
5 CORPORATE DEFENDANTS' knowledge of, and callous indifference to, BROCK'S conduct.
6 Plaintiffs placed great faith, trust, and confidence in DEFENDANTS, which, by virtue of
7 DEFENDANTS' wrongful conduct, has now turned to fear, shame, and humiliation.

8 391. A reasonable person would not expect or tolerate DEFENDANTS', including
9 CEDARS-SINAI, placing BROCK — who was known to DEFENDANTS, to have physically
10 and sexually abused other patients — in a position of care of Plaintiffs, which enabled BROCK
11 to have unfettered access to Plaintiffs allowing him to commit wrongful sexual acts, including
12 the conduct described herein.

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

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

25 394. DEFENDANTS' conduct described herein was intentional, malicious, and
26 done for the purpose of causing, or with substantial certainty, that Plaintiffs would suffer
27 humiliation, mental anguish, emotional, and physical distress.

28 395. DEFENDANT BROCK'S conduct was committed within the course and scope

1 of his employment with CORPORATE DEFENDANTS.

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

9 397. In subjecting Plaintiffs to the wrongful treatment described herein,
10 DEFENDANTS acted willfully and maliciously with the intent to harm Plaintiffs, and in
11 conscious disregard of their rights, so as to constitute malice and oppression under California
12 Civil Code § 3294. Plaintiffs are informed, and on that basis assert, that these willful, malicious,
13 and/or oppressive acts, as set forth herein, were ratified by the officers, directors, and/or
14 managing agents of the DEFENDANTS. Plaintiffs are therefore entitled to recover punitive
15 damages, in an amount to be determined by the court, against DEFENDANTS.

16 **EIGHTH CAUSE OF ACTION**
17 **NEGLIGENCE**

18 **Code of Civ. Proc. § 1714**

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

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

22 399. The CORPORATE DEFENDANTS committed the negligent acts and/or
23 negligent failures to act, as set forth above, and those acts caused the emotional and physical
24 harm endured by Plaintiffs.

25 400. From approximately 1981 through 2024, BROCK was an agent, actual,
26 apparent, and/or ostensible agent, servant, representative and/or employee of CORPORATE
27 DEFENDANTS, providing medical treatment and services through CORPORATE
28 DEFENDANTS' healthcare system. Prior to and after the first incident of BROCK'S sexual
harassment, molestation, and abuse of Plaintiffs, through the present, CORPORATE

1 DEFENDANTS knew and/or should have known that BROCK had and was capable of sexually,
2 physically, and mentally exploiting, abusing and harassing Plaintiffs or other victims.

3 401. The CORPORATE DEFENDANTS each had special duties to protect the
4 Plaintiffs, when such individuals were patients, entrusted to CORPORATE DEFENDANTS'
5 care. Plaintiffs care and health were entrusted to DEFENDANTS. DEFENDANTS voluntarily
6 accepted the entrusted care of Plaintiffs. As such, DEFENDANTS owed Plaintiffs a special duty
7 of care that medical professionals dealing with vulnerable medical patients owe to protect them
8 from harm. The duty to protect and warn arose from the special, trusting, confidential, and
9 fiduciary relationship between DEFENDANTS and Plaintiffs.

10 402. The CORPORATE DEFENDANTS breached their duty of care to Plaintiffs by
11 allowing BROCK to come into contact with Plaintiffs without effective supervision; by failing
12 to adequately hire, supervise, and retain BROCK, whom they permitted and enabled to have
13 access to Plaintiffs; by concealing from Plaintiffs, the public, and law enforcement that BROCK
14 was sexually harassing, molesting, and abusing patients; by holding BROCK out to Plaintiffs as
15 being of high moral and ethical repute, in good standing and trustworthy; and by failing to report
16 BROCK'S misconduct to the California Medical Board.

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

22 404. The CORPORATE DEFENDANTS breached their duties to Plaintiffs by
23 failing to adequately monitor and supervise DEFENDANT BROCK and failing to prevent
24 DEFENDANT BROCK from committing wrongful sexual acts with medical patients, including
25 Plaintiffs.

26 405. The CORPORATE DEFENDANTS past records of sexual misconduct by
27 BROCK caused CORPORATE DEFENDANTS to know, or gave them information where they
28 should have known, of BROCK'S incapacity to serve as a physician – especially an

1 obstetrician/gynecologist – providing for the safe care of female patients.

2 406. The CORPORATE DEFENDANTS further breached their duties to Plaintiffs
3 by failing to have adequate policies and procedures in place so as to prevent the abuse of
4 Plaintiffs.

5 407. As a direct and proximate result of the conduct of CORPORATE
6 DEFENDANTS, individually, jointly, and/or severally, Plaintiffs have suffered and continue to
7 suffer great pain of mind and body, shock, emotional distress, physical manifestations of
8 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of
9 enjoyment of life; were prevented and will continue to be prevented from performing daily
10 activities and obtaining the full enjoyment of life; and have incurred and will continue to incur
11 expenses for medical and psychological treatment, therapy, and counseling.

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

20 **NINTH CAUSE OF ACTION**
21 **GROSS NEGLIGENCE and/or WANTON and RECKLESS CONDUCT**
22 **(Against All DEFENDANTS)**

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

25 410. The CORPORATE DEFENDANTS owed Plaintiffs a duty to use due care to
26 ensure their safety and freedom from sexual assault, harassment, exploitation, abuse, and
27 molestation while interacting with their employees, representatives, and/or agents, including
28 BROCK.

411. DEFENDANT BROCK owed Plaintiffs a duty of due care in carrying out his

1 duties in a reasonable safe manner as an agent, actual, apparent and/or ostensible agent, servant,
2 representative and/or employee of CORPORATE DEFENDANTS.

3 412. By seeking medical treatment from BROCK in the course of his employment,
4 agency, and/or representation of CORPORATE DEFENDANTS, a special, confidential, and
5 fiduciary relationship between Plaintiffs and DEFENDANTS was created, resulting in
6 DEFENDANTS individually, and collectively, owing Plaintiffs a duty to use due care.

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

12 414. DEFENDANT BROCK'S conduct in sexually assaulting, harassing, abusing,
13 and violating Plaintiffs in the course of his employment, agency, and/or representation of
14 CORPORATE DEFENDANTS and under the guise of rendering medical care was so reckless as
15 to demonstrate a substantial lack of concern for whether an injury would result to Plaintiffs.

16 415. The DEFENDANTS' conduct demonstrated a willful disregard for precautions
17 to ensure Plaintiffs' safety.

18 416. The DEFENDANTS' conduct demonstrated a willful disregard for Plaintiffs'
19 rights.

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

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

1 419. The DEFENDANTS' conduct as described herein was grossly negligent and/or
2 wanton and reckless because it was despicable and was committed maliciously, fraudulently,
3 and/or oppressively with the wrongful intention of injuring Plaintiffs and with a willful and
4 conscious disregard of Plaintiffs' rights, justifying an award of punitive damages against all
5 DEFENDANTS.

6 **TENTH CAUSE OF ACTION**
7 **NEGLIGENT SUPERVISION, HIRING, TRAINING AND RETENTION**
8 ***(Against CORPORATE DEFENDANTS and DOES 1 through 100)***

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

11 421. By virtue of Plaintiffs' special relationship with CORPORATE
12 DEFENDANTS as patients, and their relationship with BROCK, DEFENDANTS owed
13 Plaintiffs a duty to provide reasonable supervision of BROCK, to use reasonable care in
14 investigating BROCK'S background, actions and serial misconduct, and to provide adequate
15 warning to Plaintiffs and other female patients of BROCK'S dangerous propensities and
16 unfitness.

17 422. As organizations and individuals responsible for, and entrusted with, the
18 welfare of female gynecological and obstetric patients, CORPORATE DEFENDANTS had a
19 duty to protect supervise, and monitor Plaintiffs from being preyed upon by sexual predators,
20 and to supervise and monitor BROCK such that he would not be placed in seclusion with
21 vulnerable medical patients, including the Plaintiffs.

22 423. DEFENDANTS expressly and implicitly represented that BROCK was a
23 legitimate gynecologist, and not a sexual threat to his female patients.

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

28 425. CORPORATE DEFENDANTS failed to properly observe, supervise, and
monitor BROCK where it was known, knowable, and/or foreseeable that female patients were

1 invited onto the premises owned, operated, controlled, and/or managed by any of the
2 CORPORATE DEFENDANTS could be victims of BROCK'S sexual abuse without proper
3 supervision.

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

9 427. CORPORATE DEFENDANTS were aware, or should have been aware, and
10 understood how vulnerable gynecological patients were to sexual harassment, sexual
11 exploitation, molestation, and abuse by physicians and other persons of authority within the
12 control and supervision of CORPORATE DEFENDANTS. CORPORATE DEFENDANTS
13 should have, but did not, put in place appropriate safeguards to prevent foreseeable harm to
14 female gynecological patients, including imposition of a policy providing for the mandatory
15 presence of an independent, properly trained chaperone to prevent, deter, and report any
16 misconduct in the context of gynecological examinations and procedures. CORPORATE
17 DEFENDANTS also failed to adequately train (or not train at all) its employees and agents in
18 how to recognize and report any sexual or medical battery or harassment.

19 428. CORPORATE DEFENDANTS knew and/or should have known that BROCK
20 had previously engaged, and continued to engage, in unlawful sexual conduct with female
21 patients, and that it was foreseeable, or should have been foreseeable, that BROCK was engaging
22 in, or would engage in, misconduct directed towards Plaintiffs and others, under the protection
23 of the authority, confidence, and trust bestowed upon him through CORPORATE
24 DEFENDANTS, their agents, servants, and employees.

25 429. Despite the fact that CORPORATE DEFENDANTS knew, or should have
26 known, of these sexually exploitive activities being perpetrated by BROCK, the CORPORATE
27 DEFENDANTS herein, failed to use reasonable care in investigating BROCK and did nothing
28 to reasonably investigate, supervise, monitor, or terminate BROCK to ensure the safety of their

1 patients.

2 430. The CORPORATE DEFENDANTS conduct was a breach of their duties to
3 Plaintiffs.

4 431. The CORPORATE DEFENDANTS, their agents, servants, and/or employees
5 knew BROCK was sexually exploiting, abusing, and harassing female patients and refused to
6 take any action to stop him. Moreover, the CORPORATE DEFENDANTS, their agents,
7 servants, and/or employees concealed information allowing BROCK to continue working for
8 CORPORATE DEFENDANTS' clinics and facilities. Despite knowledge of BROCK's sexual
9 misconduct, no disciplinary action was taken by CORPORATE DEFENDANTS allowing
10 BROCK'S continued unfettered access and ability to interact with patients, including Plaintiffs.
11 CORPORATE DEFENDANTS and their agents, servants, and/or employees are thus
12 responsible for BROCK'S acts of sexual exploitation, sexual assault, battery, and harassment.

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

20 **ELEVENTH CAUSE OF ACTION**
NEGLIGENT FAILURE TO WARN

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

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

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

28 435. The CORPORATE DEFENDANTS breached their duty to take reasonable

1 protective measures to protect Plaintiffs and other patients from the risk of sexual exploitation,
2 harassment, molestation and abuse by BROCK, such as the failure to properly warn, train, or
3 educate Plaintiffs and other patients about how to avoid the particular risk of sexual misconduct
4 that BROCK posed.

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

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

15 **TWELFTH CAUSE OF ACTION**
16 **INVASION OF PRIVACY**
17 ***(Against All DEFENDANTS)***

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

20 439. As medical patients seeking obstetrics and/or gynecological treatment
21 CORPORATE DEFENDANTS' medical facilities, Plaintiffs had a reasonable expectation of
22 privacy in such treatment. Indeed, all Californians enjoy a right to privacy, including medical
23 privacy, under the California Constitution, Article 1, Section 1.

24 440. Plaintiffs state that BROCK intruded upon Plaintiffs' solitude, seclusion, or
25 private affairs and concerns by sexually exploiting and abusing Plaintiffs during obstetric and/or
26 gynecologic and/or other examinations, treatment, care, and or Plaintiffs' bodies, without
27 authorization or consent under the guise that said exploitation and abuse was a form of legitimate
28 medical care and treatment and/or was medically necessary. This intrusion is highly offensive to
reasonable individuals, such as Plaintiffs, and was totally unwarranted and unjustified,

1 constituting invasion of privacy and a violation of the Health Insurance Portability and
2 Accountability Act (HIPAA) under California State Law.

3 441. DEFENDANT BROCK carried out such acts and misconduct as an agent,
4 actual, apparent and/or ostensible agent, servant, representative and/or employee of
5 CORPORATE DEFENDANTS, which provide medical treatment to patients and to the public,
6 including the Plaintiffs.

7 442. The CORPORATE DEFENDANTS are vicariously liable for DEFENDANT
8 BROCK'S misconduct.

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

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

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

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

23 446. A reasonable person would not expect or tolerate the sexual harassment,
24 exploitation, molestation, and abuse by BROCK, nor tolerate or expect CORPORATE
25 DEFENDANTS knowledge of, and callous indifference, to the abuse. Plaintiffs had great faith,
26 trust, and confidence in DEFENDANTS, which by virtue of DEFENDANTS' wrongful conduct,
27 turned to fear, shame, and humiliation.
28

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

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

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

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

20 451. The CORPORATE DEFENDANTS’ negligence was a substantial factor in
21 causing Plaintiffs’ serious emotional distress.

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

FOURTEENTH CAUSE OF ACTION
UNFAIR BUSINESS PRACTICES,
California Business & Professions Code § 17200
(Against All DEFENDANTS)

453. 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.

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

455. Plaintiffs are informed and believe, and on that basis allege, that DEFENDANTS engaged in a common scheme, arrangement, or plan to actively conceal allegations against BROCK so 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 of safety and security for patients and benefit financially.

456. By engaging in the unlawful, unfair, and/or deceptive business practices described above, DEFENDANTS benefited financially to the detriment of competitors and the public.

1 457. Unless restrained, DEFENDANTS will continue to engage in the unlawful,
2 unfair, and/or deceptive business practices described above, resulting in irreparable harm to
3 Plaintiffs and the public.

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

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

13 **FIFTEENTH CAUSE OF ACTION**
14 **CONSTRUCTIVE FRAUD**
 (Against All DEFENDANTS)

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

17 461. By holding BROCK out as an agent and trusted employee of CORPORATE
18 DEFENDANTS, and by allowing BROCK to undertake the medical care of female patients such
19 as Plaintiffs, DEFENDANTS entered into a confidential, fiduciary, and special relationship with
20 Plaintiffs.

21 462. The CORPORATE DEFENDANTS breached their confidential, fiduciary duty
22 and special duties to Plaintiffs by the wrongful and negligent conduct described above and
23 incorporated into this cause of action, and in so doing, gained an advantage over Plaintiffs in matters
24 relating to Plaintiffs' safety, security, and health. In breaching such duties as set-forth herein,
25 CORPORATE DEFENDANTS were able to sustain their status as institutions of high moral repute,
26 and preserve their reputations, all at the expense of Plaintiffs' further injuries, and in violation of
27 CORPORATE DEFENDANTS' mandatory duties.
28

1 463. By virtue of their confidential, fiduciary and special relationship with Plaintiffs,
2 DEFENDANTS owed Plaintiffs a duty to:

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

15 464. The CORPORATE DEFENDANTS' breach of its respective duties included:

- 16 a. Not making reasonable investigations of BROCK;
- 17 b. Issuing no warnings about BROCK;
- 18 c. Permitting BROCK to routinely be supervised only by untrained chaperones,
19 who were consistently derelict in their duty to report BROCK's sexual abuse to law enforcement;
20
- 21 d. Not adopting a policy to prevent BROCK from routinely having patients in his
22 unsupervised control;
- 23 e. Making no reports of any complaints or reports of BROCK'S abuse of patients
24 prior to or during his employment and/or agency at CORPORATE DEFENDANTS and;
- 25 f. Assigning and continuing to assign BROCK to duties which placed him in
26 positions of authority and trust over other patients, positions in which BROCK could easily
27

1 isolate and sexually exploit and abuse other patients.

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

5 466. The DEFENDANTS' misconduct did reasonably cause Plaintiffs to forbear
6 on Plaintiffs' rights.

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

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

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

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

23 471. At all times mentioned herein, CORPORATE DEFENDANTS, with
24 knowledge of the tortious nature of their own and BROCK'S conduct, knowingly conspired and
25 gave each other substantial assistance to perpetrate the misrepresentations, fraud and deceit set-
26 forth herein—covering up the past allegations of sexual misconduct lodged against BROCK,
27 and allowing BROCK to remain in his position as a physician, faculty member and doctor, so
28 they could maintain their reputations and continue with their positions within their networks and

1 medical facilities.

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

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

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

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

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

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

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

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

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

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

19 **PRAYER FOR RELIEF**

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

22
23 **FOR ALL CAUSES OF ACTION**

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

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

JURY DEMAND

Plaintiffs demand a jury trial on all issues so triable.

Date: August 19, 2025

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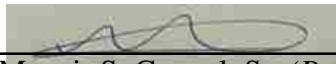
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