

NOTICE OF CLAIM

IN THE PROVINCIAL COURT OF BRITISH COLUMBIA (SMALL CLAIMS COURT)

REGISTRY FILE NUMBER	ROB-P-C-2170295
REGISTRY LOCATION	Vancouver



NOTICE OF CLAIM

FROM: NAME Jessica Simpson CLAIMANT(S)

ADDRESS 505 - 8840 210 St.

CITY, TOWN, MUNICIPALITY Langley PROV. BC POSTAL CODE V1M-2Y2 TEL. # 778 825-0259

TO: NAME VANCOUVER COASTAL HEALTH AUTHORITY DEFENDANT(S)

ADDRESS C/O Tristin Wayte 200 - 520 West 6th st.

CITY, TOWN, MUNICIPALITY Vancouver PROV. BC POSTAL CODE V5Z-1A1 TEL. # (604) 730-7654

WHAT HAPPENED? See attached pages.

If you need more space to describe what happened, attach another page, mark it "Page 2 of the Notice of Claim" and check this box. A copy of the attached page must accompany each copy of the Notice of Claim

WHERE? CITY, TOWN, MUNICIPALITY Vancouver **WHEN?** Jan 2021 - June 2021

PROV. BC

HOW MUCH?

<u>a</u> Personal injury damages under quantum and damage to property.	\$	35000.00
<u>b</u>	\$	
<u>c</u>	\$	
<u>d</u>	\$	

TIME LIMIT FOR A DEFENDANT TO REPLY		TOTAL	\$	35000.00
The defendant must complete and file the attached reply within 14 days from being served with this notice, unless the defendant settles this claim directly with the claimant. If the defendant does not reply, a court order may be made against the defendant without any further notice to the defendant. Then the defendant will have to pay the amount claimed plus interest and further expenses.		+ FILING FEES		156.00
		+ SERVICE FEES		20.00
		= TOTAL CLAIMED	\$	35,176.00
The Court Address for filing documents is: Robson Square Provincial Court 100 - 800 Hornby Street Vancouver British Columbia V6Z 2C5		<i>Other Than Debt</i>		
		PIN		



NOTICE OF CLAIM - ATTACHMENT PAGE

IN THE PROVINCIAL COURT OF BRITISH COLUMBIA (SMALL CLAIMS COURT)

What Happened? - Personal Injury - Other

When did the incident that caused the injuries occur:

Date: 10/Feb/2021

Where did the incident that caused the injuries occur:

Location: 1128 Hornby St City/Town: Vancouver BC

Other: These injuries occurred over a period of time.

Did this happen on one of the claimant's property or one of the defendant's property:

Yes

Name: VANCOUVER COASTAL HEALTH AUTHORITY

Was someone else occupying / renting the property when the injury happened:

No

Tell what happened:

On January 11, 2021 I went through gender reassignment surgery at GRS Montreal. I developed some post surgical complications in regards to hyper granulation tissue. I attended the Three Bridges Clinic since approximately Feb 1, 2021 through May 2021 for ambulatory care. At all material times, the nursing team did not perform the treatments properly, further delaying my recovery and causing additional complications including but not limited to significant vaginal bleeding.

To treat hyper granulation tissue, the nursing team used liquid nitrate sticks on the hyper granulation tissue. While this is the correct process, they immediately put saline solution on (within 45-60 seconds) onto the area which stops the liquid nitrate treatment from working.

I had to attend on a weekly basis to treat this tissue, but when things did not heal at a healthy pace, I started to raise questions. I went to my gynaecologist, Dr. Ruth Vilayil who performed the granulation treatments after I ceased to go back to Three Bridges. She did the treatments properly, with only applying the liquid nitrate on the area. I also had treatments done at the Ridge Meadows Rapid Access clinic at Haney Place Mall. They also, did the treatments correctly. I raised question with these two providers regarding saline and I was told applying saline neutralizes the nitrate on contact.

I also talked to GRS Montreal's nursing team about the correct application of liquid nitrate, which confirmed my statements.

At all material times, the nursing team at Three Bridges Clinic were destined to inflict me harm, which I believe may have been influenced by a certain "independent contractor" (PHSA claims it is an independent contractor), who works at TransCare BC and has meddled with my surgery since 2019, attempting to delay it to advance her own political beliefs regarding my trans associated human rights complaints in 2018 and 2019.

Were there witnesses to the injuries from this claim:

Yes

Witness #1

Surname: VILAYIL Firstname: RUTH Middle:

Address: C, 22195 Dewdney Trunk Rd

Town/City: Maple Ridge Prov/State: British Columbia

Country: Canada Postal/Zip: V2X-3H7 Phone: (604) 476-5493

Location at time of accident: Ridge Meadows Hospital & clinic @ 22195 Dewdney Trunk Rd, Maple Ridge BC.

Witness #2

Surname: NAGRA Firstname: KESHIA Middle:

Address: 1623 Commercial Dr

Town/City: Vancouver Prov/State: British Columbia

Country: Canada Postal/Zip: V5L-3Y3 Phone: 604 254-5554

Location at time of accident: At her clinic, Care Point Medical, routine examinations of malpractice caused by VCH @ Three Bridges Clinic.

Witness #3

Surname: BRASSARD Firstname: PIERRE Middle:

Address: 999 Rue de Salaberry

Town/City: Montreal Prov/State: Québec

Country: Canada Postal/Zip: H3L-1L2 Phone: (514) 288-2097

Location at time of accident: At 999 Rue de Salaberry. This is the Surgeon that performed the surgery. The nurses there advised that the way the treatment at Three Bridges Clinic was done is completely incorrect.

Describe the injury of Jessica Simpson:

Constant bleeding from vaginal area due to unhealed hypergranulation tissue.

Has Jessica Simpson been treated for his/her injury:

Yes

Treatments received by Jessica Simpson

Treatment #1

Name of Doctor or Medical Professional: DR. RUTH VILAYIL

Description of treatment given: Silver nitrate treatment and routine examinations.

Date :01/May/2021

Description of ongoing treatment: Routing examinations. Note, treatment occurred over a period of time from January 2021 till approximately June 2021

Do you have a written report: No

Is Jessica Simpson fully recovered from his/her injury:

Yes

When did Jessica Simpson recover:

01/Oct/2021

Did Jessica Simpson lose any time off work because of his/her injury:

Yes

Who employed Jessica Simpson at the time of this injury:

MR SWIRL

What were his/her duties:

Marketing coordinator

How much time did Jessica Simpson miss:

Accumulated 1-2 weeks

Did Jessica Simpson lose income because of the injury:

No

Did the injury sustained by Jessica Simpson stop him/her from doing anything else:

Yes

What has Jessica Simpson been unable to do:

Perform daily living tasks. Employment was affected due to discomfort. Inability to sleep, perform surgical care tasks.

Did Jessica Simpson lose any other money, or have to spend any other money as a result of this claim:

Yes

Total Amount Spent or Lost:

\$500.00

Description of total amount:

Parking at Pacific Centre to walk to Three Bridges or take a cab back and forth. The amount declared is an estimated amount.

Is Jessica Simpson claiming for any loss or injury other than those that are covered in the questions above:

Yes

Describe fully:

Claiming quantum damages of \$35,000 due to inappropriate conduct and malpractice. I suffered suicidal ideation, extreme anxiety, stress, ptsd. I am also claiming property damage of a mattress and accessories (mattress cover, sheets) to the amount of \$4,000.00.

CERTIFICATE OF SERVICE

REGISTRY FILE NUMBER

REGISTRY LOCATION

Vancouver

CERTIFICATE OF SERVICE

Fill in:

Who served the document(s)?

The name of the party served;

When were the document(s) served?

Where were the document(s) served?

I certify that

I, _____ served _____

on _____
at _____
Day/Month/Year

at _____
Street address or location, city, province

with _____

LIST and ATTACH ALL document(s) that you served.

Tell how service took place by checking appropriate box(es) for:

an individual;

by

- Leaving a copy of it with him or her.
- Mailing a copy of it by registered mail to him or her.

a company as defined in the *Business Compensation Act*;

- Mailing a copy of it by registered mail to the registered office of the company.
- Leaving a copy of it
 - at the registered office of the company
 - at the place of business of the company, with a receptionist or a person who appears to manage or control the company's business there
 - with a director, officer, liquidator, trustee in bankruptcy or receiver manager of the company.

Insurance Corporation of BC (ICBC)

- Mailing a copy of it by registered mail to the legal department at the Insurance Corporation of British Columbia (ICBC).
- Leaving a copy of it at the legal department at the Insurance Corporation of British Columbia (ICBC).

an extraprovincial company as defined in the *Business Corporations Act*;

- Mailing a copy of it by registered mail to the attorney shown in the corporate registry.
- Leaving a copy of it with the attorney shown in the corporate registry.
- Leaving a copy of it at the head office shown in the corporate registry if that head office is in British Columbia.
- Mailing a copy of it by registered mail to the head office shown in the corporate registry if that head office is in British Columbia.

a partnership;

- Mailing a copy of it by registered mail to a partner.
- Leaving a copy of it
 - with a partner
 - at the place of business of the partnership, with a person who appears to manage or control the partnership business there
 - with a receptionist who works at a place of business of the partnership.

a municipal corporation, regional district or other local government body;

- Giving a copy to the clerk, deputy clerk or a similar official.

a young person;

- Leaving a copy of the notice with the defendant's mother, father or guardian.

a society within the meaning of the *Societies Act*;

- Mailing a copy of it by registered mail to the mailing address of the society's registered office on file with the Registrar of Companies.
- Leaving a copy of it
 - at the delivery address of the society's registered office on file with the Registrar of Companies
 - with a director, officer, receiver manager or liquidator of the society.

a corporation incorporated outside British Columbia if it is not an extraprovincial company;

- Mailing a copy of it by registered mail to a place of business or registered office of the corporation outside British Columbia.
- Leaving a copy of it
 - at a place of business or registered office of the corporation outside British Columbia with a receptionist or a person who appears to manage or control the corporation's business
 - with a director, officer, liquidator, trustee in bankruptcy or receiver manager of the corporation.

ordinary mail (and fill in the date mailed);

- Mailing a copy of it by ordinary mail to that person's address on _____
Day/Month/Year

(NOTE: The date the documents are presumed served (above) is 14 days after this date.)

OTHER SERVICE method or alternate method ordered by the Court.

- (Indicate other service method or instructions given by a judge or registrar for service.)

NOTE: You must give proof of service by REGISTERED MAIL by attaching one of the following:

1. a copy, produced by fax or otherwise, of the signature obtained by Canada Post at the time the document was delivered.
2. a print-out of the delivery confirmation made available on the Internet by Canada Post (<http://www.canadapost.ca>).