

IN THE CIRCUIT COURT  
TWENTIETH JUDICIAL CIRCUIT  
ST. CLAIR COUNTY, ILLINOIS

RICK HAGEN, as Administrator                     )  
of the Estate of LORNA R. HAGEN,             )  
deceased,   )  
   )  
          Plaintiff,                                     )  
   )  
v.   )     No.   19-L-0566  
   )  
BRADLEY WILLIAM STOCKMANN, M.D.,             )  
MIDWEST RADIOLOGICAL ASSOCIATES,             )  
P.C., a corporation, and                         )  
ALTON MEMORIAL HOSPITAL, a                     )  
not-for-profit corporation,                     )  
   )  
          Defendants.                                     )

COMPLAINT

COUNT I

(Wrongful Death v. Bradley William Stockmann, M.D.)

Comes now the plaintiff, Rick Hagen, as Administrator of the Estate of Lorna R. Hagen, deceased, by and through his attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, for Count I of his Complaint against the defendant, Bradley William Stockmann, M.D., states:

1. That on or about June 7, 2019, Lorna R. Hagen, died, and her husband, Rick Hagen, has been duly appointed Administrator of her Estate and brings this action pursuant to the provisions of the Illinois Wrongful Death Statute and Illinois Survival Statute.

2. That at all times herein mentioned Lorna R. Hagen was a citizen and resident of the State of Illinois when she came under the care of defendants herein.

3. That on or about December 14, 2017, and thereafter, and at all times herein mentioned, the defendant, Bradley William Stockmann, M.D., was a medical doctor, specializing in radiology, and an agent, apparent agent, servant, and employee of defendant Midwest Radiological Associates, P.C., when he and it assumed the care of Lorna R. Hagen for the performance and interpretation of a mammogram.

4. That on or about December 14, 2017, and thereafter, and at all times herein mentioned, the defendant, Midwest Radiological Associates, P.C., was a Missouri corporation, authorized and doing business in the State of Illinois, when it, by an through, its agents, servants, and employees assumed the care of Lorna R. Hagen for the performance and interpretation of a mammogram.

5. That at all times herein mentioned, the defendant, Alton Memorial Hospital, was a not-for-profit corporation, authorized and doing business in the State of Illinois, when it, by and through its agents, apparent agents, servants and

employees assumed the care of Lorna R. Hagen for the performance and interpretation of a mammogram.

6. That at all times herein mentioned, the defendant, Alton Memorial Hospital was a not-for-profit corporation, authorized and doing business in the State of Illinois when it acted in a manner that would lead a reasonable person, including Lorna R. Hagen, to conclude that Bradley William Stockmann, M.D. was an employee or agent of said hospital.

7. That at all times herein mentioned, the acts of Bradley William Stockmann, M.D. created the appearance of authority and defendant Alton Memorial Hospital had knowledge and acquiesced in them.

8. That at all times herein mentioned, Lorna R. Hagen acted in reliance upon the conduct of the defendants, Bradley William Stockmann, M.D., Midwest Radiological Associates, P.C., and Alton Memorial Hospital.

9. That on or about August 27, 2018, Lorna R. Hagen first discovered that she had cancer and therefore she neither knew nor by the exercise of reasonable care could have known of her injury and its wrongful cause before that date.

10. That the defendant, individually, and by and through its agents, apparent agents, servants, and employees, was guilty of one or more of the following negligent acts or omissions:

- a) Negligently and carelessly misread the mammogram film on December 4, 2017.

11. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions on the part of the defendant as aforesaid, Lorna R. Hagen died and her next of kin has been permanently deprived of her love, companionship, society, support, and has incurred and become liable for large sums of money in hospital, medical, and related expenses, all to their damage in a substantial amount.

WHEREFORE, plaintiff demands judgment against the defendant in an amount greater than SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), plus costs.

#### COUNT II

(Wrongful Death v. Midwest Radiological Associates, P.C.)

Comes now the plaintiff, Rick Hagen, as Administrator of the Estate of Lorna Hagen, deceased, by and through his attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, and for Count II of his Complaint against the defendant, Midwest Radiological Associates, P.C., states:

1. - 11. Plaintiff hereby adopts and incorporates the allegations of paragraphs 1 through and including 11 of Count I as and for paragraphs 1 through and including 11 of Count II.

WHEREFORE, plaintiff demands judgment against the defendant in an amount greater than SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), plus costs.

### COUNT III

(Wrongful Death v. Alton Memorial Hospital)

Comes now the plaintiff, Rick Hagen, as Administrator of the Estate of Lorna Hagen, deceased, by and through his attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, and for Count III of his Complaint against the defendant, Alton Memorial Hospital, states:

1. - 11. Plaintiff hereby adopts and incorporates the allegations of paragraphs 1 through and including 11 of Count I as and for paragraphs 1 through and including 11 of Count III.

WHEREFORE, plaintiff demands judgment against the defendant in an amount greater than SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), plus costs.

COUNT IV

(Survival Claim v. Bradley William Stockmann, M.D.)

Comes now the plaintiff, Rick Hagen, as Administrator of the Estate of Lorna Hagen, deceased, by and through his attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, and for Count IV of his Complaint against the defendant, Bradley William Stockmann, M.D., states:

1. - 10. Plaintiff hereby adopts and incorporates the allegations of paragraphs 1 through and including 10 of Count I as and for paragraphs 1 through and including 10 of Count IV.

11. That as a direct and proximate result of one or more of the foregoing negligent acts or omissions on the part of the defendant as aforesaid, Lorna R. Hagen's condition went undiagnosed and untreated; she suffered permanent pain, mental anguish, disfigurement, incurred medical bills up until the time of her death, and was permanently prevented from attending to her usual affairs and duties up to the time of her death, all to her damage in a substantial amount.

WHEREFORE, plaintiff demands judgment against the defendant in an amount greater than SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), plus costs.

COUNT V

(Survival Claim v. Midwest Radiological Associates, P.C.)

Comes now the plaintiff, Rick Hagen, as Administrator of the Estate of Lorna Hagen, deceased, by and through his attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, and for Count V of his Complaint against the defendant, Midwest Radiological Associates, P.C., states:

1. - 11. Plaintiff hereby adopts and incorporates the allegations of paragraphs 1 through and including 11 of Count IV as and for paragraphs 1 through and including 11 of Count V.

WHEREFORE, plaintiff demands judgment against the defendant in an amount greater than SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), plus costs.

COUNT VI

(Survival Claim v. Alton Memorial Hospital)

Comes now the plaintiff, Rick Hagen, as Administrator of the Estate of Lorna Hagen, deceased, by and through his attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, and for Count VI of his Complaint against the defendant, Alton Memorial Hospital, states:

1. - 11. Plaintiff hereby adopts and incorporates the allegations of paragraphs 1 through and including 11 of Count IV as and for paragraphs 1 through and including 11 of Count VI.

WHEREFORE, plaintiff demands judgment against the defendant in an amount greater than SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00), plus costs.

/s/SAMANTHA S. UNSELL  
SAMANTHA S. UNSELL  
Ill. Reg. No. 6298752  
Attorney for Plaintiff

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