

2. That at all times herein mentioned, Defendant JFJ Eyecare, Ltd., d/b/a Quantum Vision Centers was a corporation, doing business in St. Clair County, Illinois, when, by and through its agents, apparent agents, servants, and employees, on or about August 2018, it assumed the care of Plaintiff Edward Clark.

3. That on or about August 9, 2018, Defendant performed anterior chamber washout on Plaintiffs left eye.

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

- a) Negligently and carelessly failed to identify retained lens material before performing a wash out procedure;
- b) Negligently and carelessly performed washout procedure;
- c) Negligently and carelessly failed to do a proper work up of the patient's eye inflammation.

5. 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, Plaintiff developed an infection, blindness, and subsequent enucleation with implant and tarsorrhaphy of his left eye. He has suffered permanent vision loss, permanent pain, mental anguish, disability and

disfigurement, and loss of enjoyment in a normal life. He has been prevented from attending to his usual affairs and duties. He has incurred large sums of money in hospital, medical, and related expenses, and will incur additional such sums in the future, all to his damage in a substantial amount.

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

COUNT II

(Negligence v. JFJ Eyecare, Ltd., d/b/a Quantum Vision Centers)

Comes now the plaintiff, by and through his attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, and for Count II of his Complaint against the defendant JFJ Eyecare, Ltd., d/b/a Quantum Vision Centers states:

1. - 5. Plaintiff hereby adopts and incorporates paragraphs 1 through and including 5 of Count I as and for paragraphs 1 through and including 5 of Count II.

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

COUNT III

(Loss of Consortium v. Michael P. Jones, M.D.)

Comes now the plaintiff Sandy Clark, by and through her attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, and for Count III of her Complaint against the defendant Michael P. Jones, M.D., states:

1. - 4. Plaintiff hereby adopts and incorporates paragraphs 1 through and including 4 of Count I as and for paragraphs 1 through and including 4 of Count III.

5. That as a direct and proximate result of the negligent acts or omission on the part of the defendants as aforesaid, and the injuries and damages suffered by Edward Clark, plaintiff Sandy Clark has suffered permanent damages in that she has incurred and become liable for large sums of money in hospital, medical and related expenses, and will become liable for additional sums in the future, and has been permanently deprived of the love, companionship, consortium, and support of her husband.

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

COUNT IV

(Loss of Consortium v. JFJ Eyecare, Ltd., d/b/a Quantum Vision Centers)

Comes now the plaintiff Sandy Clark, by and through her attorneys, **KEEFE, KEEFE & UNSELL, P.C.**, and for Count IV of her Complaint against the defendant FJ Eyecare, Ltd., d/b/a Quantum Vision Centers states:

1. - 5. Plaintiff hereby adopts and incorporates paragraphs 1 through and including 5 of Count III as and for paragraphs 1 through and including 5 of Count IV.

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

/s/ Thomas Q. Keefe, III
Thomas Q Keefe, III
IL REG NO. 6294376
Attorney for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2019, I electronically filed the COMPLAINT with the Clerk of Court using the EFM system.

/s/ Thomas Q. Keefe, III

SUBMIT

COUNTY