IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT DUPAGE COUNTY, ILLINOIS

Thomas C. Fernandez.)		
)		
Plaintiff,)		
)	Case No.	2022LA001051
VS.)		
)		
Meier Clinics of Illinois, P.C.,)		
An Illinois Corporation,)		
_)		
Defendant.)		

VERIFIED AMENDED COMPLAINT – 03/30/2023

NOW COMES the Plain	tiff, Thomas	C. Fernandez,	by and	through	his a	ttorney,
Pro Se	, and as his Co	omplaint agains	st the De	fendant,	Meier	Clinics
of Illinois P.C., states as follows:						

PARTIES

- The Plaintiff, Thomas C. Fernandez (Fernandez) is an individual residing in DuPage County,
 Illinois and was a former patient of Meier Clinics of Illinois, P.C.
- The Defendant, Meier Clinics of Illinois, P.C., (Meier) is an Illinois corporation with its principal office and registered agent's address at 2100 Manchester Road, Suite 1510, Wheaton, Illinois.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

3. On 10/19/2021, Steve Lee, an agent of Meier, contacted Fernandez's wife, in direct disregard of Fernandez's request that Meier no longer contact his family, and told her that Fernandez stated "My wife is weaponizing my medication and is psycho".

COUNT I GROSS, MALICIOUS, VINDICTIVE PROFESSIONAL NEGLIGENCE

- 4. Steve Lee caused Fernandez's divorce, and the extensive list of damages.
- 5. An affidavit of damages had been provided to this court.

WHEREFORE, the Plaintiff prays this honorable Court find in its favor and enter judgment against the Defendant as to Count I of this Complaint in an amount in excess of \$50,000, and for any other relief the Court deems just and appropriate.

Respectfully Submitted

Thomas Fernandez

VERIFICATION

State of Illinois) SS
County of DuPage)

The undersigned, deposes and states that he is the Plaintiff in this matter, and under penalties of perjure, does hereby state that the information contained herein is true and correct to his best knowledge and belief.

Thomas C. Fernandez

Subscribed and sworn to before me this 30th day of March, 2023

ANGELA SURLETA-RYAN Official Seal Notary Public - State of Illinois Ay Commission Expires Sep 28, 2024

Filer:

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