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Attorney for Petitioners Marat Gabdullin and
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF ORANGE

MARAT GABDULLIN and AIGERIM
BIMOLDINA, individually and as Parents
and proposed or duly appointed Guardians
ad Litem of AILIN MARAT
GABDULLINA, a Minor,
Plaintiffs,
v.

RADY CHILDREN'S HEALTH ORANGE
COUNTY dba CHOC; CHILDREN'S
HOSPITAL OF ORANGE COUNTY; and
DOES 1 through 50, inclusive,
Defendants.

Case No.: 30-2026-01580246-CL-MC-CXC

**COMPLAINT FOR DAMAGES,
INJUNCTIVE RELIEF, AND
DECLARATORY RELIEF**

1. Breach of Fiduciary Duty / Failure to Obtain Consent for Medical Services
2. Medical Battery / Assault and Battery
3. Abuse, Neglect, and Mistreatment of a Disabled Minor Child
4. Negligence / Negligence Per Se
5. Declaratory Relief
6. Injunctive Relief

DEMAND FOR JURY TRIAL

I.

INTRODUCTION

- 1.- This civil action arises from Defendants' alleged unauthorized, non-consensual, and harmful medical acts performed on **Ailin Marat Gabdullina**, a disabled and medically fragile minor child, including testing and procedures associated with brain-death determination after Ailin's parents and legal representatives objected and instructed Defendants not to proceed without meaningful consent, records access, independent review, and appropriate safeguards.
- 2.- Plaintiffs **Marat Gabdullin** and **Aigerim Bimoldina** are Ailin's biological parents. They bring this action individually and in their representative capacities as parents and proposed or duly appointed Guardians ad Litem of Ailin, a minor born July 18, 2024.

1 3.- Plaintiffs allege that Defendants owed Ailin and her parents heightened duties of disclosure,
2 loyalty, informed consent, respect for parental medical decision-making, and protection from
3 non-consensual bodily contact. Defendants allegedly breached those duties by proceeding with,
4 preparing for, or conducting brain-death testing and related medical services without valid
5 parental consent and against express parental instructions.

6 4.- Plaintiffs further allege that Defendants' conduct constituted intentional, harmful, and/or
7 offensive medical touching; assault; abuse, neglect, and mistreatment of a disabled minor child;
8 and negligence or negligence per se under California law, including statutes governing patient
9 rights, medical records access, neurological death procedures, and hospital accommodation
10 obligations.

11 5.- Plaintiffs seek compensatory damages, general damages, special damages, punitive damages
12 where permitted by law, declaratory relief, injunctive relief, costs of suit, and all other relief the
13 Court deems proper.

14 **II. PARTIES**

15 6.- Plaintiff **Marat Gabdullin** is the biological father and legal guardian of minor **Ailin Marat**
16 **Gabdullina**. He resides in Orange County, California.

17 7.- Plaintiff **Aigerim Bimoldina** is the biological mother and legal guardian of minor **Ailin**
18 **Marat Gabdullina**. She resides in Orange County, California.

19 8.- Plaintiff **Ailin Marat Gabdullina** is a minor child, born July 18, 2024. She is the real party in
20 interest and is medically fragile, disabled, and dependent on others for all medical decision-
21 making and physical care.

22 9.- Defendant **Rady Children's Health Orange County dba CHOC** and/or **Children's**
23 **Hospital of Orange County** is a hospital located at or near 1201 W. La Veta Avenue, Orange,
24 California 92868. Plaintiffs allege on information and belief that this entity or these entities
25 owned, operated, managed, staffed, controlled, or were otherwise responsible for the hospital,
26 pediatric intensive care unit, physicians, nurses, administrators, risk-management personnel,
27 ethics personnel, and other agents involved in Ailin's care.

28 10.- Plaintiffs are unaware of the true names and capacities of Defendants sued as **DOES 1**
through 50, inclusive. Plaintiffs will amend this Complaint to allege their true names and
capacities when ascertained. Plaintiffs allege on information and belief that each DOE Defendant
was responsible in some manner for the events and damages alleged herein.

1 11.- Plaintiffs allege that each Defendant was the agent, employee, servant, representative, joint
2 venturer, ostensible agent, partner, managing agent, or co-conspirator of the other Defendants,
3 and acted within the course and scope of that relationship, or that Defendants ratified, authorized,
4 approved, or failed to prevent the conduct alleged herein.

5 **III. JURISDICTION AND VENUE**

6 12.- This Court has jurisdiction under Article VI, section 10 of the California Constitution and
7 Code of Civil Procedure sections 410.10, 526, 527, and 1060.

8 13.- Venue is proper in Orange County because Defendants conduct business in Orange County,
9 the hospital at issue is located in Orange County, and the acts and omissions giving rise to this
10 action occurred in Orange County.

11 14.- Plaintiffs allege that the amount in controversy exceeds the jurisdictional minimum of this
12 Court, according to proof at trial.

13 **IV. FACTUAL ALLEGATIONS**

14 15.- Ailin is a medically fragile minor child with significant underlying medical conditions,
15 including chromosomal abnormalities, hypotonia, and epilepsy.

16 16.- On or about June 7, 2026, Ailin was admitted to the pediatric intensive care unit following a
17 choking incident and cardiac arrest. She was placed on mechanical ventilation.

18 17.- Before the events giving rise to this Complaint, hospital personnel informed Plaintiffs that
19 Ailin continued to demonstrate reactive pupils and some spontaneous respiratory effort.

20 18.- On or about June 9, 2026, Ailin experienced a significant drop in blood pressure. Plaintiffs
21 are informed and believe, and thereon allege, that medication needed to support or stabilize
22 Ailin's blood pressure was not immediately available at the point of care and had to be obtained
23 from pharmacy, storage, downstairs, or another location.

24 19.- Plaintiffs are informed and believe, and thereon allege, that there was a substantial delay
25 before the blood-pressure-support medication was obtained and administered. Plaintiffs presently
26 estimate the delay at approximately 60 to 90 minutes, subject to amendment after production of
27 complete medication, pharmacy, vital-sign, and monitoring records.

28 20.- After the hypotensive episode, hospital personnel informed Plaintiffs that Ailin no longer
demonstrated pupillary responses and no longer exhibited spontaneous respiratory effort.

21.- Plaintiffs repeatedly requested the complete records necessary for independent review,
including physician notes, nursing notes, medication orders, medication administration records,
pharmacy dispensing records, pharmacy verification records, Pyxis/Omniceil logs, vital-sign

1 trends, monitor data, code or rapid-response records, EEG data, imaging, laboratory records, and
2 records relating to any brain-death determination procedures.

3 22.- Plaintiffs also sought independent review and transfer opportunities through outside
4 institutions, including Children's National Hospital and other facilities.

5 23.- Plaintiffs hold sincere religious and conscientious beliefs requiring additional time for
6 prayer, family participation, family presence, and exhaustion of reasonable medical review before
7 irreversible action resulting in withdrawal of ventilatory or cardiopulmonary support.

8 24.- Plaintiffs requested involvement of the Ethics Committee, Patient Relations, hospital
9 administration, risk management, and other hospital departments. Plaintiffs also requested a brief
10 accommodation period under Health and Safety Code section 1254.4.

11 25.- On or about June 25, 2026, Plaintiffs submitted an urgent request asking CHOC to continue
12 ventilatory and cardiopulmonary support through a brief accommodation period, permit family
13 presence and Islamic prayer, provide CHOC's accommodation policy, identify the responsible
14 decision-makers, provide a written response, and produce complete medical records.

15 26.- On or about June 27, 2026, Plaintiffs submitted a written **Parent Request for Cerebral**
16 **Blood Flow Evaluation**, asking that every reasonable effort be made to fully evaluate Ailin's
17 condition before any further irreversible medical decisions were made. Plaintiffs specifically
18 requested consideration of a cerebral blood flow study, cerebral perfusion study, radionuclide
19 cerebral perfusion scan, nuclear medicine cerebral blood flow study, or other clinically
20 appropriate ancillary test evaluating cerebral blood flow.

21 27.- Plaintiffs allege that Defendants had notice that Plaintiffs objected to immediate irreversible
22 action and objected to brain-death testing and related procedures without prior meaningful
23 consent, complete disclosure, records access, independent review, and an opportunity to evaluate
24 alternatives and transfer options.

25 28.- Plaintiffs allege on information and belief that Defendants nevertheless engaged in,
26 attempted, prepared for, or proceeded with testing for brain death and related medical services
27 against the instructions of Ailin's parent and Guardian ad Litem.

28 29.- Plaintiffs allege that brain-death testing and related procedures are medical services
involving bodily contact, manipulation, observation, stimulation, ventilator changes, apnea testing
or related interventions, ancillary testing, medication decisions, monitoring, and other medically
significant acts that require lawful consent, proper disclosure, and compliance with accepted
medical standards.

1 30.- Plaintiffs allege that any brain-death testing, apnea testing, or related intervention conducted
2 without valid parental consent and over parental objection constituted an intentional, harmful, and
3 offensive touching of Ailin's body and an invasion of Ailin's personal rights.

4 31.- Plaintiffs allege that Defendants' conduct caused injury and damage to Ailin, including but
5 not limited to physical harm, increased medical risk, loss of bodily integrity, pain and suffering to
6 the extent legally recoverable, interference with parental and guardian decision-making,
7 emotional and dignitary harm, and other damages according to proof.

8 32.- Plaintiffs further allege that Defendants' conduct caused damage to Plaintiffs Marat
9 Gabdullin and Aigerim Bimoldina, including emotional distress, loss of trust, loss of meaningful
10 participation in their child's care, interference with religious and family practices, and costs
11 incurred to obtain legal relief, medical review, records, and transfer consideration.

12 33.- Plaintiffs allege that Defendants' acts were undertaken in conscious disregard of the rights
13 and safety of a vulnerable disabled minor child and her parents, and were oppressive, malicious,
14 fraudulent, or despicable within the meaning of California Civil Code section 3294, according to
15 proof.

16 **V. FIRST CAUSE OF ACTION**

17 **Breach of Fiduciary Duty / Failure to Obtain Consent for Medical Services**

18 **Against All Defendants**

19 34.- Plaintiffs reallege and incorporate by reference paragraphs 1 through 33 as though fully set
20 forth herein.

21 35.- Defendants stood in a fiduciary, confidential, professional, and trust-based relationship with
22 Ailin and her parents. Ailin was a minor, disabled, medically fragile, and entirely dependent on
23 Defendants for safe medical care. Plaintiffs were required to rely on Defendants' superior medical
24 knowledge, control of information, control of records, and control over access to Ailin's bedside,
25 chart, testing, and treatment.

26 36.- California law recognizes that physicians and healthcare providers owe duties of disclosure
27 and informed consent before performing medical treatment or procedures. These duties include
28 disclosing material information necessary for the patient or authorized decision-maker to make an
informed decision regarding the proposed procedure, alternatives, risks, and consequences.

37.- Because Ailin is a minor child, Defendants were required to obtain lawful consent from her
parents or legal representatives before performing non-emergency medical services, testing,

1 procedures, or bodily interventions, except to the extent a legally recognized emergency
2 exception applied.

3 38.- Plaintiffs allege that no emergency justified disregarding parental instructions concerning
4 brain-death testing or related procedures. Plaintiffs further allege that Defendants had time to
5 communicate with Plaintiffs, receive their written objections and requests, consider independent
6 review, provide records, and comply with statutory and hospital-policy requirements.

7 39.- Defendants breached their fiduciary and informed-consent duties by, among other things:

8 a.- Failing to obtain valid parental consent before proceeding with or attempting brain-death
9 testing or related procedures;

10 b.- Proceeding with medical testing against the instructions of Ailin's parent and Guardian ad
11 Litem;

12 c.- Failing to provide complete and timely information regarding the nature, purpose, risks,
13 alternatives, timing, and consequences of brain-death testing and related procedures;

14 d.- Failing to provide complete medical records necessary for independent review before
15 irreversible medical decisions;

16 e.- Failing to disclose or apply policies governing brain-death testing, notice, apnea testing,
17 accommodation, and family objections;

18 f.- Failing to meaningfully consider Plaintiffs' request for cerebral blood flow evaluation or other
19 ancillary diagnostic evaluation before irreversible decisions;

20 g.- Failing to respect Plaintiffs' role as Ailin's legal medical decision-makers;

21 h.- Placing Defendants' institutional objectives, administrative preferences, or risk-management
22 interests above Ailin's rights and safety; and

23 i.- Failing to act with the loyalty, candor, disclosure, and care required in the circumstances.

24 40.- Plaintiffs allege that Defendants' breaches caused injury to Ailin and Plaintiffs, including loss
25 of bodily integrity, unauthorized medical touching, increased medical risk, emotional and
26 dignitary harm, interference with parental decision-making, costs of obtaining legal and medical
27 review, and other damages according to proof.

28 41.- Defendants' conduct was a substantial factor in causing Plaintiffs' damages.

42.- Plaintiffs are entitled to compensatory damages, general damages, special damages, punitive
damages where permitted by law, declaratory relief, injunctive relief, costs of suit, and all other
relief the Court deems proper.

1 **VI. SECOND CAUSE OF ACTION**

2 **Medical Battery / Assault and Battery**

3 **Against All Defendants**

4 43.- Plaintiffs reallege and incorporate by reference paragraphs 1 through 42 as though fully set
5 forth herein.

6 44.- Plaintiffs allege that Defendants intentionally performed, attempted to perform, authorized,
7 directed, assisted, or ratified medical testing and bodily interventions upon Ailin without valid
8 consent and against parental instructions.

9 45.- Plaintiffs allege that the non-consensual acts included, but were not limited to, brain-death
10 testing, apnea testing or related procedures, neurological testing, stimulation, ventilator
11 manipulation, medication decisions, monitoring, and other physical contact or interventions
12 associated with determining death by neurological criteria.

13 46.- Plaintiffs did not consent to those acts. Plaintiffs expressly objected to brain-death testing
14 and related medical services without meaningful records access, disclosure, independent review,
15 and an opportunity to pursue transfer or ancillary testing.

16 47.- Ailin, as a disabled minor child, lacked capacity to consent. Plaintiffs were her parents, legal
17 guardians, and medical decision-makers. Defendants knew or should have known that Plaintiffs'
18 consent was required and that Plaintiffs objected.

19 48.- Defendants' acts were harmful, offensive, unauthorized, and contrary to Plaintiffs'
20 instructions. A reasonable person in Ailin's position, and a reasonable parent acting for a disabled
21 minor child, would regard the acts as offensive and harmful when performed over parental
22 objection and without lawful consent.

23 49.- Defendants' acts placed Ailin in apprehension of imminent harmful or offensive contact to
24 the extent Ailin had awareness or capacity to experience apprehension. In the alternative,
25 Defendants' conduct constituted battery even if Ailin's medical condition limited her ability to
26 apprehend the contact.

27 50.- Defendants' conduct caused injury and damage to Ailin and Plaintiffs, including loss of
28 bodily integrity, dignitary harm, physical risk, emotional distress, interference with family and
religious practices, and other damages according to proof.

51.- Plaintiffs are entitled to compensatory damages, general damages, special damages, punitive
damages where permitted by law, declaratory relief, injunctive relief, costs of suit, and all other
relief the Court deems proper.

1 **VII. THIRD CAUSE OF ACTION**

2 **Abuse, Neglect, and Mistreatment of a Disabled Minor Child**

3 **Against All Defendants**

4 52.- Plaintiffs reallege and incorporate by reference paragraphs 1 through 51 as though fully set
5 forth herein.

6 53.- Ailin is a disabled, medically fragile minor child. She was dependent on Defendants for
7 medical care, protection, monitoring, safe treatment, and avoidance of unnecessary harm.

8 54.- Plaintiffs allege that Defendants owed Ailin duties imposed by common law, professional
9 standards, hospital policies, and California statutes protecting children, disabled persons, and
10 patients from abuse, neglect, unreasonable bodily harm, and unauthorized medical treatment.

11 55.- Plaintiffs allege that Defendants abused, neglected, and mistreated Ailin by, among other
12 things:

13 a.- Proceeding with or attempting brain-death testing and related procedures against parental
14 instructions;

15 b.- Subjecting a disabled minor child to non-consensual medical touching and testing;

16 c.- Failing to obtain valid consent from the parents and legal representatives before medical
17 services;

18 d.- Failing to provide a safe and timely response to Ailin's hypotensive episode, including the
19 alleged delay in obtaining blood-pressure-support medication;

20 e.- Failing to provide complete records necessary to evaluate whether Ailin's neurological
21 deterioration was caused or worsened by Defendants' acts or omissions;

22 f.- Failing to protect Ailin from foreseeable risk of physical harm, neurological harm, emotional
23 harm, and dignitary harm;

24 g.- Failing to accommodate the parents' religious, cultural, and family-presence needs
25 surrounding irreversible medical decisions;

26 h.- Failing to respect Ailin's status as a minor child whose parents were actively objecting and
27 seeking independent medical review; and

28 i.- Treating Ailin as a subject of institutional procedure rather than as a disabled child entitled to
bodily integrity, parental protection, and individualized safeguards.

56.- Plaintiffs allege that Defendants' conduct violated public policies embodied in California
Civil Code section 43, Health and Safety Code sections 7180, 7181, 123110, and 1254.4, and

1 other applicable statutes, regulations, and standards of care protecting bodily integrity, medical
2 consent, records access, neurological-death procedures, and family accommodation.

3 57.- Plaintiffs allege that Defendants' conduct was a substantial factor in causing harm to Ailin
4 and Plaintiffs.

5 58.- Plaintiffs seek all damages and remedies available for abuse, neglect, mistreatment, and
6 violation of Ailin's rights as a disabled minor child, including compensatory damages, general
7 damages, special damages, punitive damages where permitted by law, declaratory relief,
injunctive relief, costs of suit, and all other relief the Court deems proper.

8 **VIII. FOURTH CAUSE OF ACTION**

9 **Negligence / Negligence Per Se**

10 **Against All Defendants**

11 59.- Plaintiffs reallege and incorporate by reference paragraphs 1 through 58 as though fully set
12 forth herein.

13 60.- Defendants owed Ailin and Plaintiffs duties to exercise reasonable care in providing medical
14 services, maintaining adequate medication availability, responding to hypotension, conducting
15 neurological assessment, obtaining informed consent, respecting parental medical decision-
16 making, producing records, preserving evidence, and complying with applicable law and accepted
medical standards.

17 61.- Defendants breached those duties by, among other things:

18 a.- Failing to ensure that necessary blood-pressure-support medication was immediately available
19 when needed;

20 b.- Failing to timely obtain and administer medication necessary to support or stabilize Ailin's
21 blood pressure;

22 c.- Failing to prevent or mitigate neurological deterioration allegedly following a prolonged
23 hypotensive episode;

24 d.- Failing to obtain valid informed consent before brain-death testing or related medical services;

25 e.- Failing to comply with accepted medical standards for neurological-death evaluation and
26 testing;

27 f.- Failing to provide reasonable notice, disclosure, records access, and accommodation before
28 irreversible medical decisions;

g.- Failing to provide complete records necessary for independent review;

1 h.- Failing to consider or obtain requested ancillary cerebral blood-flow evaluation before
2 irreversible decisions; and

3 i.- Failing to train, supervise, monitor, and control staff to prevent unauthorized medical services
4 and harm to a disabled minor child.

5 62.- Plaintiffs allege that Defendants violated statutes, regulations, and public-safety enactments
6 including, without limitation, Health and Safety Code sections 7180, 7181, 123110, and 1254.4,
7 and Civil Code section 43. Plaintiffs allege that these enactments were designed to protect
8 patients, minors, families, and medical decision-makers from the type of harm suffered here.

9 63.- Plaintiffs allege that Defendants' statutory violations establish negligence per se or are
10 evidence of negligence under Evidence Code section 669.

11 64.- Defendants' negligence and statutory violations were substantial factors in causing harm to
12 Ailin and Plaintiffs.

13 65.- Plaintiffs are entitled to compensatory damages, general damages, special damages, costs of
14 suit, and all other relief the Court deems proper.

15 **IX. FIFTH CAUSE OF ACTION**

16 **Declaratory Relief**

17 **Against All Defendants**

18 66.- Plaintiffs reallege and incorporate by reference paragraphs 1 through 65 as though fully set
19 forth herein.

20 67.- An actual controversy exists between Plaintiffs and Defendants concerning their respective
21 rights and obligations, including but not limited to:

22 a.- Whether Defendants may perform brain-death testing, apnea testing, or related medical
23 services on Ailin without valid parental consent and over express parental objection;

24 b.- Whether Defendants were required to disclose the nature, risks, alternatives, and consequences
25 of brain-death testing and related procedures before proceeding;

26 c.- Whether Defendants were required to provide complete medical records and policies before
27 proceeding with irreversible decisions;

28 d.- Whether Defendants were required to make reasonable efforts to notify and accommodate
Plaintiffs before neurological-death testing and discontinuation of cardiopulmonary support;

e.- Whether Defendants were required to preserve all records, audit trails, monitor data, pharmacy
data, medication records, communications, policies, and incident-related evidence; and

1 f.- Whether Defendants' conduct violated Ailin's rights to bodily integrity, parental medical
2 decision-making, informed consent, accommodation, and protection from abuse or neglect.

3 68.- Plaintiffs request a judicial declaration of the parties' rights and duties under California law,
4 including Health and Safety Code sections 7180, 7181, 123110, and 1254.4; Civil Code section
5 43; Evidence Code section 669; and applicable common-law duties governing informed consent,
6 fiduciary duty, battery, negligence, and protection of disabled minors.

7 69.- Declaratory relief is necessary and appropriate because the controversy concerns ongoing
8 and time-sensitive medical, parental, statutory, and bodily-integrity rights that cannot be fully
9 remedied by damages alone.

10 **X. SIXTH CAUSE OF ACTION**

11 **Injunctive Relief**

12 **Against All Defendants**

13 70.- Plaintiffs reallege and incorporate by reference paragraphs 1 through 69 as though fully set
14 forth herein.

15 71.- Plaintiffs seek injunctive relief preserving the status quo and preventing further unauthorized
16 medical services, brain-death testing, apnea testing, related neurological-death procedures,
17 withdrawal of ventilatory or cardiopulmonary support, destruction or alteration of evidence, or
18 interference with independent review and transfer efforts.

19 72.- Plaintiffs allege that they have no adequate remedy at law because unauthorized medical
20 testing, withdrawal of support, destruction of evidence, or loss of meaningful independent review
21 would cause irreparable harm that cannot be fully compensated by money damages.

22 73.- Plaintiffs allege that the balance of harms favors injunctive relief. A brief order preserving
23 the status quo protects Ailin's bodily integrity, parental rights, religious and family practices,
24 records access, and independent review. Denial of relief risks irreversible harm.

25 74.- Plaintiffs request temporary, preliminary, and permanent injunctive relief as set forth in the
26 Prayer below.

27 **XI. DAMAGES**

28 75.- As a direct and proximate result of Defendants' acts and omissions, Plaintiffs have suffered
damages in an amount according to proof, including but not limited to:

- a.- Physical injury and medical risk to Ailin;
- b.- Loss of bodily integrity and dignitary harm;
- c.- Emotional distress and mental suffering;

- 1 d.- Interference with parental medical decision-making;
2 e.- Interference with religious and family-presence practices;
3 f.- Costs of legal intervention, independent medical review, records requests, transfer efforts, and
4 related expenses;
5 g.- Special damages according to proof;
6 h.- General damages according to proof; and
7 i.- Other damages according to proof.

7 76.- Plaintiffs allege that Defendants acted with oppression, fraud, malice, despicable conduct,
8 and/or conscious disregard of the rights and safety of Ailin, a disabled minor child, and her
9 parents. Plaintiffs therefore seek punitive and exemplary damages under Civil Code section 3294
10 where permitted by law and after compliance with any applicable procedural requirements.

11 **XII. PRAYER FOR RELIEF**

11 WHEREFORE, Plaintiffs pray for judgment against Defendants, and each of them, as follows:

- 12 1.- For compensatory damages according to proof;
13 2.- For general damages according to proof;
14 3.- For special damages according to proof;
15 4.- For punitive and exemplary damages according to proof where permitted by law;
16 5.- For a declaration that Defendants may not perform brain-death testing, apnea testing, or
17 related medical procedures on Ailin without valid legal authority, proper disclosure, and lawful
18 consent or a recognized legal exception;
19 6.- For a declaration that Defendants must comply with California law governing informed
20 consent, bodily integrity, medical records access, neurological-death procedures, and family
21 accommodation;
22 7.- For a temporary restraining order, preliminary injunction, and permanent injunction
23 prohibiting Defendants from performing further unauthorized brain-death testing, apnea testing,
24 related neurological-death procedures, or withdrawal of ventilatory or cardiopulmonary support
25 without further order of the Court;
26 8.- For an order requiring Defendants to preserve all medical, pharmacy, monitoring, EEG,
27 imaging, laboratory, audit-trail, communication, policy, incident-related, risk-management, and
28 electronically stored evidence concerning Ailin;
9.- For an order requiring immediate inspection and production of Ailin's complete medical
record, including medication orders, medication administration records, pharmacy logs,

COMPLAINT FOR DAMAGES

Pyxis/Omniceil logs, vital-sign data, monitor data, code or rapid-response records, EEG data, imaging, laboratory records, physician notes, nursing notes, neurological-death testing records, apnea-testing records, ancillary-testing records, policies, communications, and audit trails;
10.- For an order requiring production of Defendants' brain-death, apnea-testing, notice, consent, records-access, religious-accommodation, and Health and Safety Code section 1254.4 policies;
11.- For an order permitting independent pediatric neurology, pediatric neurocritical-care, and/or other appropriate physician review;
12.- For an order permitting reasonable transfer efforts and communication with prospective receiving facilities;
13.- For costs of suit incurred herein;
14.- For prejudgment and postjudgment interest as allowed by law;
15.- For attorney's fees if authorized by statute, contract, or other applicable law; and
16.- For such other and further relief as the Court deems just and proper.

XIII. DEMAND FOR JURY TRIAL

Plaintiffs demand trial by jury on all issues so triable.

Dated 6-29-2026

Respectfully submitted,
John Hranek, Esq.

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VERIFICATION

We, **Marat Gabdullin** and **Aigerim Bimoldina**, declare under penalty of perjury under the laws of the State of California that we have read the foregoing Complaint and know its contents. The matters stated therein are true of our own knowledge, except as to matters stated on information and belief, and as to those matters, we believe them to be true.

Executed on 6-29-26, at Irvine, California.



Marat Gabdullin



Aigerim Bimoldina

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