

IN THE CIRCUIT COURT OF PULASKI COUNTY, ARKANSAS

DEBORAH SMITH, AS SPECIAL  
ADMINISTRATRIX OF THE ESTATE OF  
RONALD SMITH, DECEASED

PLAINTIFF

vs.

No. 60cv-15-\_\_\_\_\_

GASTROENTEROLOGY AND SURGERY  
CENTER OF ARKANSAS P.A. d/b/a  
KANIS ENDOSCOPY CENTER;  
ALONZO D. WILLIAMS, SR., M.D.;  
ARKANSAS DIAGNOSTIC CENTER, P.A.;  
ADC ANESTHESIA SERVICES, P.L.C.;  
AND FRANK J. LADMIRAULT, CRNA

DEFENDANTS

COMPLAINT AND DEMAND FOR JURY TRIAL

Comes the Plaintiff, Deborah Smith, as Special Administratrix of the Estate of Ronald Smith, deceased, by and through her attorneys, The Brad Hendricks Law Firm, and for her cause of action states:

1. Plaintiff is a resident of Pulaski County and is the duly appointed Special Administratrix of the Estate of Ronald Smith who died intestate in Pulaski County on April 17, 2014.
2. Plaintiff's cause of action is based on medical negligence resulting in the wrongful death of Ronald Smith. Damages for survivorship and wrongful death are claimed.
3. Defendant Alonzo D. Williams, Sr., M.D. is a gastroenterologist practicing in Pulaski County, Arkansas, owning or partially owning Gastroenterology and Surgery Center of Arkansas, P.A. d/b/a Kanis Endoscopy Center, Arkansas Diagnostic Center, P.A., and ADC Anesthesia Services, P.L.C.
4. Defendant Frank J. Ladmiraault is a CRNA practicing at Kanis Endoscopy Center and

at all times pertinent to this cause of action was an employee of ADC Anesthesia Services, P.L.C., and was being supervised by Defendant Dr. Alonzo D. Williams, Sr.

5. ADC Anesthesia Services, P.L.C. is a company providing anesthesia services at Kanis Endoscopy Center for Defendant Williams and other physicians associated with Arkansas Diagnostic Center, P.A.

6. Defendant Arkansas Diagnostic Center, P.A. is a clinic providing gastroenterology services, located in Little Rock, Arkansas. At all times pertinent to this cause of action Defendant Alonzo D. Williams, Sr., M.D. was both an employee of Arkansas Diagnostic Center, P.A. and owner of the facility.

7. Defendant Gastroenterology and Surgery Center of Arkansas, P.A. d/b/a Kanis Endoscopy Center is a endoscopy center located in Little Rock, Arkansas, and at all times pertinent to this cause of action, was owned and/or operated by Defendant Alonzo Williams, M.D.

8. On April 9, 2014, Ronald Williams was admitted to Kanis Endoscopy Center for the purpose of undergoing a colonoscopy. The colonoscopy was performed by Defendant Alonzo D. Williams, Sr., M.D. and anesthesia was provided by Defendant Frank J. Ladmiraault under the control and supervision of Defendant Williams.

9. Almost immediately after the procedure, Mr. Smith stopped breathing, and a code blue was called. He was resuscitated by the code team and then transferred to Baptist Health in Little Rock. Unfortunately, Mr. Williams suffered hypoxic brain injury from lack of oxygen, and he passed away on April 17, 2014. His death was caused by the hypoxic brain injury that ultimately resulted in a cardio-respiratory arrest.

10. Ronald Smith had numerous medical conditions that made him at extremely high risk for undergoing conscious sedation, those conditions included obstructive sleep apnea, obesity, coronary artery disease, and chronic renal failure. Patients with this constellation of conditions should not undergo colonoscopies at outpatient facilities absent special measures, including the ability to administer general anesthesia and the involvement and direct supervision of CRNAs by trained anesthesiologists.

11. That Defendant Alonzo D. Williams, Sr., M.D. was negligent in the care and treatment of Ronald Williams in the following respects:

- a. Performing the procedure in a facility not properly equipped to address the medical and anesthesia needs of Mr. Williams;
- b. Failing to appropriately supervise Defendant Ladmiraault;
- c. Failing to consult with an anesthesiologist with respect to an anesthesia plan concerning Mr. Smith.
- d. Failing to properly screen Mr. Smith with respect to the suitability of performing the procedure at Kanis Endoscopy Center.

12. Defendant Ladmiraault was negligent in the care and treatment of Ronald Williams in the following respects:

- a. Failing to develop an appropriate anesthesia plan.
- b. Administering anesthesia to Ronald Smith in an outpatient setting without adequate monitoring equipment.
- c. Administering anesthesia to Ronald Smith without consulting with an anesthesiologist.

- d. Failing to lodge objections with Defendant Williams with respect to performing the procedure at the Kanis Endoscopy Center.

13. Defendant Gastroenterology and Surgery Center of Arkansas, P.A. d/b/a Kanis Endoscopy Center was negligent in failing to formulate and institute appropriate screening for potential endoscopy patients, and procedures designed to identify and direct high risk patients to facilities providing higher degrees of care including anesthesiologists who can perform general anesthesia.

14. That had Ronald Smith been properly managed with appropriate anesthesia, appropriate monitoring and appropriate supervision in an appropriate environment, then in all probability he would not have arrested and suffered the hypoxic injury that resulted in his death.

15. That as a result of the negligence of defendants, as set forth herein, Ronald Smith died.

16. That Deborah Smith, as Special Administratrix of the Estate of Ronald Smith, claims damages on behalf of the estate as follows:

- a. Medical expense;
- b. Burial and funeral expenses; and,
- c. Loss of value of life damages.

17. That Deborah Smith, as Special Administratrix of the Estate of Ronald Smith, claims damages on behalf of the wrongful death beneficiaries, as follows:

- a. Mental and emotional anguish suffered over the loss of Ronald Smith;
- b. Deborah's loss of the services and society of her husband; and,
- c. Pecuniary losses.

18. That Plaintiff claims damages in an unliquidated amount and demands a trial by jury.

WHEREFORE, Plaintiff prays that upon trial of this matter she be awarded reasonable damages in an amount exceeding the minimum amount required for federal jurisdiction in diversity of citizenship cases, and for all other relief to which she may be entitled.  
entitled.

Respectfully submitted,

***THE BRAD HENDRICKS LAW FIRM***

500 C Pleasant Valley Drive

Little Rock, AR 72227

(501) 221-0444

(501) 219-0608 - fax

lporter@bradhendricks.com

BY:



Lamar Porter, ABN 78128