

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

HYUN BAE CHO, Special Administrator
of the Estate of GRACE CHO, Deceased,

Plaintiff,

v.

TIMBERLINE KNOLLS RESIDENTIAL
TREATMENT CENTER; and
TK BEHAVIORAL, LLC.

Defendants.

No.

**PLAINTIFF DEMANDS
TRIAL BY JURY**

2018000095
CALENDAR ROOM
TIME 00:00
2018 JAN 29 PM 12:14

COMPLAINT AT LAW

COUNT I
WRONGFUL DEATH ACT

Plaintiff, HYUN BAE CHO, Special Administrator of the Estate of GRACE CHO, Deceased, by her attorneys, CLIFFORD LAW OFFICES, P.C., complaining of Defendants, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER and TK BEHAVIORAL, LLC. (hereafter "HUSSEIN"), states as follows:

1. On January 24, 2018, and at all times mentioned herein, Defendant, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER, was a duly licensed medical center providing various medical services to patients and residents admitted therein.
2. On January 24, 2018, and at all times mentioned herein, Defendant, TK BEHAVIORAL, LLC., was a duly licensed healthcare institution providing various medical services to patients and residents admitted to their treatment facilities.
3. On January 24, 2018, Defendants, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER and TK BEHAVIORAL, LLC.

4. On January 24, 2018, Plaintiff's Decedent, GRACE CHO, was transported to TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER for inpatient admission and psychiatric treatment.

5. On January 24, 2018, GRACE CHO, Deceased, was admitted to TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER.

6. On January 24, 2018, Defendant, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER was aware that Plaintiff's Decedent, GRACE CHO, was at high risk for suicide.

7. On January 24, 2018, Defendant, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER was aware that Plaintiff's Decedent, GRACE CHO, was on suicide watch.

8. On January 24, 2018, Defendant, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER allowed Plaintiff's Decedent, GRACE CHO, to leave the premises.

9. On January 24, 2018, and at all times thereafter, Defendants, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER and TK BEHAVIORAL, LLC. had a duty to ensure the security of their premises to prevent improper ingress or egress.

10. On January 24, 2018, and at all times thereafter, Defendant, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER and TK BEHAVIORAL, LLC. has a duty to ensure the safety and security of their premises.

11. On January 24, 2018, and at all times mentioned herein, Defendants, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER and TK BEHAVIORAL, LLC., had duty to act as a reasonably careful healthcare institution/facility under similar circumstances.


12. On January 24, 2018, and thereafter, Defendant, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER and TK BEHAVIORAL, LLC., were negligent in the following ways:

- a) Failed to properly secure the premises;
- b) Failed to properly monitor the premises through the use of video surveillance;
- c) Failed to protect the health and safety of their residents and admittees;
- d) Discharged Plaintiff's Decedent, GRACE CHO;
- e) Allowed Plaintiff's decedent to elope from the facility;
- f) Ignored GRACE CHO's risk factors and warning signs for suicide; and
- g) Were otherwise careless and negligence.

13. As a direct and proximate result of the aforesaid negligent acts or omissions of the Defendants TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER and TK BEHAVIORAL, LLC., Plaintiff's Decedent, GRACE CHO, sustained injuries resulting in her death on January 25, 2018.

14. Plaintiff, HYUN BAE CHO, is the duly appointed Special Administrator of the Estate of GRACE CHO, Deceased, and brings this action pursuant to the Wrongful Death Act of the State of Illinois.

WHEREFORE Plaintiff, HYUN BAE CHO, Special Administrator of the Estate of GRACE CHO, Deceased, by her attorneys, CLIFFORD LAW OFFICES, P.C., demands judgment against Defendants, TIMBERLINE KNOLLS RESIDENTIAL TREATMENT CENTER and TK BEHAVIORAL, LLC., in an amount in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).



Attorney for Plaintiff

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