

1 Daniel M. Hodes, Esq. [State Bar No. 101773]
2 HODES MILMAN
3 9210 Irvine Center Drive
4 Irvine, CA 92618
5 Telephone: (949) 640-8222
6 Facsimile: (949) 336-8114
7 dhodes@hodesmilman.com
8 vkesler@hodesmilman.com

9 Attorneys for Plaintiff, JAMES HOPWOOD

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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**
13

14 JAMES HOPWOOD,
15
16 Plaintiff,
17
18 vs.

19 ADVANCED DENTAL HB; SCOTT D.
20 CHRISTENSEN, DDS, INC; SCOTT D.
21 CHRISTENSEN, DDS; RUDOLPH GAMARNIK,
22 DDS; JONATHAN AKHAVAN, DMD;
23 RONALD THOMPSON, DDS; MARY MEJIA,
24 RDH; JESSICA BAUER, RDH; KELLY LE
25 FRANCOIS, RDH; JANELLA HERNANDEZ;
26 and DOES 1 through 50, Inclusive,
27
28 Defendants.

CASE NO: 30-2026-01542119-CU-MM-CJC

ASSIGNED FOR ALL PURPOSES TO:

Judge Theodore Howard

**COMPLAINT FOR DAMAGES FOR
MEDICAL NEGLIGENCE; DEMAND FOR
JURY TRIAL**

Complaint Filed:

Plaintiff JAMES HOPWOOD alleges and complains as follows:

GENERAL ALLEGATIONS

1. The events giving rise to this action occurred in the County of Orange, State of California.
2. Plaintiff does not know the true names and capacities of those Defendants designated as DOES 1 through 50, Inclusive, but alleges that each of said fictitiously named Defendants was negligently and unlawfully responsible for the events hereinafter described and for the injuries and damages sustained by Plaintiff. Plaintiff will ask leave of court to amend this allegation when the identity of each said fictitiously named Defendants has been ascertained.
3. Plaintiff is informed and believes and thereon alleges that each of the Defendants sued herein as a

1 DOE is responsible in some manner for the events and happenings herein referred to, thereby
2 contributing as a substantial factor in bringing about the injuries and damages to Plaintiff as herein
3 alleged.

4 4. Plaintiff is informed and believes and thereon alleges that, at all times herein mentioned,
5 Defendants ADVANCED DENTAL HB.; SCOTT D. CHRISTENSEN, DDS, INC.; SCOTT D.
6 CHRISTENSEN, DDS; RUDOLPH GAMARNIK, DDS; JONATHAN AKHAVAN, DMD;
7 RONALD THOMPSON, DDS; MARY MEJIA, RDH; JESSICA BAUER, RDH; KELLY LE
8 FRANCOIS, RDH; JANESEA HERNANDEZ; and DOES 1 through 15, Inclusive, were and now
9 are physicians, dentists, medical corporations, dental practices, health maintenance organizations,
10 surgeons, dental hygienists, surgical nurses and technicians, office personnel, physical therapists,
11 and paramedical professionals licensed by the State of California to practice their specialty in said
12 state, with offices located within the County of Orange, State of California, and that each of them
13 has held him or herself out to the public, including Plaintiff, to possess that degree of skill, ability,
14 and learning common to practitioners in said community.

15 5. Plaintiff is informed and believes and thereon alleges that, at all times herein mentioned,
16 Defendants ADVANCED DENTAL HB.; SCOTT D. CHRISTENSEN, DDS, INC.; SCOTT D.
17 CHRISTENSEN, DDS.; RUDOLPH GAMARNIK, DDS; JONATHAN AKHAVAN, DMD;
18 RONALD THOMPSON, DDS; MARY MEJIA, RDH; JESSICA BAUER, RDH.; KELLY LE
19 FRANCOIS, RDH; JANESEA HERNANDEZ; and DOES 16 through 35, Inclusive, were and now
20 are dental clinics, medical hospitals, health care systems, emergency medical facilities, and
21 industrial medical facilities licensed to provide hospital and medical services in the County of
22 Orange, State of California to which members of the public were and are invited, including
23 Plaintiff.

24 6. Plaintiff is informed and believes and thereon alleges that, at all times herein mentioned,
25 Defendants ADVANCED DENTAL HB.; SCOTT D. CHRISTENSEN, DDS, INC.; SCOTT D.
26 CHRISTENSEN, DDS; RUDOLPH GAMARNIK, DDS; JONATHAN AKHAVAN, DMD;
27 RONALD THOMPSON, DDS; MARY MEJIA, RDH; JESSICA BAUER, RDH; KELLY LE
28 FRANCOIS, RDH; JANESEA HERNANDEZ; and DOES 36 through 50, Inclusive, were and are

1 product providers, manufacturers, or in some way in the stream of commerce relative to a defective
2 and/or unsafe product which caused or contributed to Plaintiff's injuries as alleged more fully
3 below.

4 7. Plaintiff is informed and believes and thereon alleges that, at all relevant times, each Defendant,
5 ADVANCED DENTAL HB.; SCOTT D. CHRISTENSEN, DDS, INC.; SCOTT D.
6 CHRISTENSEN, DDS; RUDOLPH GAMARNIK, DDS; JONATHAN AKHAVAN, DMD;
7 RONALD THOMPSON, DDS; MARY MEJIA, RDH; JESSICA BAUER, RDH; KELLY LE
8 FRANCOIS, RDH; JANESSA HERNANDEZ; and DOES 1 through 50, Inclusive, (hereinafter
9 "Defendants") was the agent, servant, representative, partner, or employee of each of their co-
10 Defendants, and in doing the things alleged in this Complaint, was acting within the course and
11 scope of his, her, or its authority as such agent, servant, representative, partner or employee of
12 their co-Defendants.

13 8. Defendants, in holding themselves out as experts and specialists in their field of dentistry,
14 possessing skill, learning, and expertise in said field, represented to Plaintiff that they would, at all
15 times, exercise and use skill, prudence, learning, knowledge, and expertise in their care and
16 treatment in accordance with the standard of practice among competent, reputable, and prudent
17 dental healthcare providers undertaking the diagnosis and treatment of such patients.

18 9. On December 10, 2025, Plaintiff JAMES HOPWOOD, by and through his legal counsel, served
19 letters notifying Defendants ADVANCED DENTAL HB.; SCOTT D. CHRISTENSEN, DDS,
20 INC.; SCOTT D. CHRISTENSEN, DDS; RUDOLPH GAMARNIK, DDS; JONATHAN
21 AKHAVAN, DMD; MARY MEJIA, RDH; JESSICA BAUER, RDH; KELLY LE FFRANCOIS,
22 RDH; JANESSA HERNANDEZ., of his intent to commence legal action pursuant to Code of Civil
23 Procedure section 364. This action is therefore timely filed within the parameters set forth in
24 California Code of Civil Procedure section 340.5.

25 10. On December 12, 2025, Plaintiff JAMES HOPWOOD, by and through his legal counsel, served a
26 letter notifying Defendant RONALD THOMPSON, DDS, of his intent to commence legal action
27 pursuant to Code of Civil Procedure section 364. This action is therefore timely filed within the
28 parameters set forth in California Code of Civil Procedure section 340.5.

FIRST CAUSE OF ACTION

(Dental Negligence against all Defendants)

11. Plaintiff JAMES HOPWOOD re-alleges and incorporates by reference the foregoing paragraphs as though set forth at length herein.

12. Plaintiff JAMES HOPWOOD engaged for compensation the services of Defendants to examine, diagnose, prescribe medicines for, perform surgery on, treat, handle, control, and seek competent consultant advice for the care, treatment, and diagnosis of a medical problem involving Plaintiff's well-being, as well as to perform necessary tests, therapies, and surgeries for the treatment of said problem if same were required.

13. Defendants undertook to handle and control the care and treatment of Plaintiff JAMES HOPWOOD and to seek whatever consultant advice was reasonably necessary for his diagnosis and treatment.

14. In the aforementioned examinations, evaluations, diagnoses, dental treatments, consultations, procedures, prescriptions, and the handling, supervision, and control of the care and treatment of Plaintiff JAMES HOPWOOD, Defendants negligently and tortiously failed to possess or exercise that degree of knowledge or skill that would ordinarily be possessed and exercised by reasonably careful dentists, periodontists, dental hygienists, and dental care providers, practicing in the same professions or similar locality and under similar circumstances as Defendants, in that said Defendants failed to timely recognize, evaluate, biopsy, and/or refer suspicious oral and periodontal lesions or conditions, failed to make appropriate and timely referrals to oral surgeons, periodontists, or other specialists, and failed to properly monitor, document, and follow up on Plaintiff's oral condition and symptoms, thereby delaying diagnosis and treatment and causing injury and damages to Plaintiff.

15. Specifically, in or about April 2023, Plaintiff JAMES HOPWOOD presented to Advanced Dental HB with complaints of an observable oral lesion adjacent to Tooth #15. Plaintiff was thereafter seen on multiple occasions by Defendants ADVANCED DENTAL HB.; SCOTT D. CHRISTENSEN, DDS.; SCOTT D. CHRISTENSEN, DDS, INC.; RUDOLPH GAMARNIK, DDS; JONATHAN AKHAVAN, DMD; RONALD THOMPSON, DDS; MARY MEJIA, RDH;

1 JESSICA BAUER, RDH; KELLY LE FRANCOIS, RDH; and JANELLA HERNANDEZ.

2 During these visits, Defendants negligently failed to take an adequate history of the lesion, failed
3 to properly document and chart its presence and progression, and failed to timely report, refer, or
4 recommend evaluations by appropriate specialists, including for biopsy, despite the lesion's
5 chronicity and persistence. Additionally, Defendants failed to adequately inform Plaintiff of the
6 seriousness of the condition and failed to arrange or ensure appropriate follow-up care and
7 consultations, thereby delaying diagnosis and treatment.

8 16. In May of 2025, Plaintiff JAMES HOPWOOD, following a biopsy, was notified that he had
9 advanced-stage squamous cell carcinoma, a diagnosis that was made only after a substantial
10 delay, by which time the disease had significantly progressed requiring extensive and aggressive
11 medical treatment.

12 17. As a direct and proximate result of the acts and omissions of the Defendants, Plaintiff JAMES
13 HOPWOOD suffered a delay of more than two years in the diagnosis of what was found to be
14 Stage IV squamous cell carcinoma and sustained serious and severe personal injuries, as well as
15 pain, suffering, and anxiety. Said injuries have caused and will continue to cause Plaintiff JAMES
16 HOPWOOD to sustain pain, physical disability, disfigurement, anxiety, and disruption of the
17 nervous system, all to his general damages according to proof at the time of trial.

18 18. As a further direct and proximate result of the acts and omissions of the Defendants, Plaintiff
19 JAMES HOPWOOD was compelled to and did employ the services of physicians, surgeons,
20 nurses and the like to handle and care for Plaintiff JAMES HOPWOOD's treatment, thereby
21 incurring medical, professional and incidental expenses. Plaintiff JAMES HOPWOOD is informed
22 and believes and, based upon such information and belief, alleges that he will necessarily and by
23 reason of his injuries incur additional like expenses for an indefinite period of time in the future,
24 the sum of which will conform to proof at the time of trial.

25 19. As a further direct and proximate result of the acts and omissions of the Defendants, Plaintiff
26 JAMES HOPWOOD has sustained, and will in the future sustain, loss of earnings and loss of
27 earning capacity, the sum of which will conform to proof at the time of trial.

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1 **RELIEF SOUGHT**

2 Plaintiff JAMES HOPWOOD seeks the following judgment against each Defendant as follows:

- 3 1. General damages according to proof at the time of trial;
- 4 2. Medical and other special damages, past, present, and future, according to proof at the
- 5 time of trial;
- 6 3. Damages for loss of earnings and other monetary benefits according to proof at the time
- 7 of trial;
- 8 4. Costs of suit incurred herein; and
- 9 5. For such other and further relief as the court may deem just and proper.

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11 Dated: January 23, 2026

HODES MILMAN

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13 By:



14 DANIEL M. HODES, ESQ.
Attorneys for Plaintiff
JAMES HOPWOOD

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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury in this matter on all issues so triable.

Dated: January 23, 2026

HODES MILMAN

By:



Daniel M. Hodes
Attorneys for Plaintiff
JAMES HOPWOOD