

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU

Index No: 608907/2022  
Date Purchased: 07/08/2022

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ANDREA ZMORA, AS ADMINISTRATOR OF THE  
ESTATE OF ESTELLE KAPLAN,

SUMMONS

Plaintiffs,

Plaintiff designates NASSAU  
County as the place of trial.

-against-

The basis of venue is:  
PLAINTIFF'S RESIDENCE

KEVA GALDAMEZ, N.P., LEON SCHWECHTER, M.D.,  
and ADVANCED INTERNAL MEDICINE GROUP, P.C.

Defendants.

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To the above named Defendants:

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Mineola, New York  
July 7, 2022



\_\_\_\_\_  
CARAMIA R. HART, ESQ.  
Finz & Finz, P.C.  
Attorneys for Plaintiff, ANDREA ZMORA, AS  
ADMINISTRATOR OF THE ESTATE OF  
ESTELLE KAPLAN  
410 East Jericho Turnpike  
Mineola, New York 11501  
(516) 433-3000

TO:

KEVA GALDAMEZ, N.P.  
2200 Northern Blvd., Suite 133  
East Hills, NY 11548

LEON SCHWECHTER, M.D.  
2200 Northern Blvd., Suite 133  
East Hills, NY 11548

ADVANCED INTERNAL MEDICINE GROUP, P.C.  
2200 Northern Blvd., Suite 133  
East Hills, NY 11548

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NASSAU

Index No: 608907/2022

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ANDREA ZMORA, as Administrator of the Estate of  
ESTATE OF ESTELLE KAPLAN,

VERIFIED COMPLAINT

Plaintiffs,

-against-

KEVA GALDAMEZ, N.P., LEON SCHWECHTER, M.D.,  
and ADVANCED INTERNAL MEDICINE GROUP, P.C.

Defendants.  
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Plaintiff, by her attorneys, Finz & Finz, P.C., complaining of the Defendants, respectfully alleges, upon information and belief, as follows:

**AS AND FOR A FIRST CAUSE OF ACTION**

1. Plaintiff, ANDREA ZMORA, is the ADMNISTRATOR OF THE ESTATE OF ESTELLE KAPLAN, with the Certificate appointing Limited letters of Administration received by Surrogate's Court, Nassau County.
2. This action falls within one or more of the exemptions set forth in CPLR §1602.
3. At all times mentioned herein, Defendant ADVANCED INTERNAL MEDICINE GROUP, P.C. was a domestic professional corporation duly organized and existing under, and by virtue of, the laws of the State of New York.
4. At all times mentioned herein, the principal place of business of Defendant ADVANCED INTERNAL MEDICINE GROUP, P.C. was located in the State of New York, County of NASSAU.
5. At all times mentioned herein, Defendant ADVANCED INTERNAL MEDICINE GROUP, P.C., owned, operated, controlled, and managed a hospital pursuant to the laws of the State of New York for the care of the sick, located at 1825 Eastchester Rd., Bronx, New York, which provided personnel, including doctors, nurses, attendants and others for the care and treatment of its patients and which held itself out to the public as furnishing treatment facilities where patients, including Plaintiff's Decedent ESTELLE KAPLAN could be treated for various ailments.
6. At all times mentioned herein, Defendant KEVA GALDAMEZ, N.P. was a nurse practitioner duly licensed to practice nursing in the State of New York.

7. At all times mentioned herein, Defendant LEON SCHWECHTER, M.D., was a physician duly licensed to practice medicine in the State of New York
8. At all times mentioned Defendant KEVA GALDAMEZ, N.P. held herself out to be a nurse practitioner offering professional services to the public in general, and to Plaintiff's decedent, in particular.
9. At all times mentioned herein, Defendant DAVID ERLICHMAN, M.D. held himself out to be a physician offering professional services to the public in general, and to Plaintiff's decedent, in particular.
10. At all times mentioned herein, Defendant KEVA GALDAMEZ, N.P., was an agent of Defendant ADVANCED INTERNAL MEDICINE GROUP, P.C.
11. At all times mentioned herein, Defendant LEON SCHWECHTER, M.D was an owner of Defendant ADVANCED INTERNAL MEDICINE GROUP, P.C.
12. At all times mentioned herein, Defendant LEON SCHWECHTER, M.D was a partner of Defendant ADVANCED INTERNAL MEDICINE GROUP, P.C.
13. At all times mentioned herein, Defendant LEON SCHWECHTER, M.D was an agent of Defendant ADVANCED INTERNAL MEDICINE GROUP, P.C.
14. At all times mentioned herein, Defendant LEON SCHWECHTER, M.D. was the supervisor of Defendant KEVA GALDAMEZ, N.P.
15. At all times mentioned herein, Defendant LEON SCHWECHTER, M.D. held himself out to be a physician offering professional services to the public in general, and to Plaintiff's decedent, in particular.
16. From on or before March 29, 2018, and continuously thereafter, Plaintiff's decedent sought the professional care of Defendant ADVANCED INTERNAL MEDICINE GROUP, P.C. for certain medical complaints from which she was suffering, and this Defendant, its agents and employees, including Defendants KEVA GALDAMEZ, N.P., LEON SCHWECHTER, M.D., rendered medical and nursing care, diagnosis, treatment and services to her.
17. The above medical and nursing care, diagnosis, treatment and services rendered to Plaintiff's decedent was rendered carelessly, unskillfully, negligently, and not in accordance with accepted standards of medical and nursing care, diagnosis, treatment and services in the community.
18. By reason of the above-stated negligent medical and nursing care, diagnosis, treatment and services rendered to Plaintiff's decedent, Plaintiff's decedent was deprived of appropriate medical and nursing care, diagnosis, treatment and services, and as a result, sustained great

pain, agony, injury, suffering, disability, hospitalization, as well as mental anguish and emotional distress until her demise on July 15, 2021.

19. By reason of the above-stated negligent medical and nursing care, diagnosis, treatment and services rendered to Plaintiff's decedent, Plaintiff's decedent was deprived of appropriate medical and nursing care, diagnosis, treatment and services, and as a result, sustained untreated, infected, necrotic, and gangrenous decubitus ulcers, wounds, pressure injuries, sepsis, osteomyelitis, necrotizing fasciitis, metabolic encephalopathy, septic shock, pain, suffering and death on July 15, 2021.
20. By reason of the above-stated negligent medical care, testing, diagnoses, and/or care and treatment rendered to Plaintiff's decedent, Plaintiff brings this action for the conscious pain and suffering of Plaintiff's decedent for damages, both general and special, in a sum that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

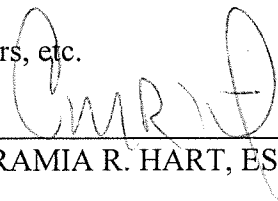
**AS AND FOR A SECOND CAUSE OF ACTION**

21. Plaintiff repeats and realleges each and every allegation set forth above with the same force and effect as if set forth at length herein.
22. By reason of the above-stated negligent medical care, emergency care, radiological care, diagnosis, treatment and services rendered to Plaintiff's decedent, Plaintiff's decedent was deprived of appropriate medical care, emergency care, radiological care, diagnosis, treatment and services, and as a result, sustained great pain, agony, injury, suffering, disability, hospitalization, as well as mental anguish and emotional distress until her demise on July 15, 2021.
23. By reason of the above, Plaintiff, ANDREA ZMORA, brings this action on behalf of the ESTATE OF ESTELLE KAPLAN its distributees and beneficiaries, and on behalf of all others entitled to compensation, for damages, both general and special, in a sum that exceeds the jurisdictional limits of all lower courts.

**WHEREFORE**, Plaintiff(s) demand(s) judgment against the Defendants herein on all causes of action, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Mineola, New York  
July 7, 2022

Yours, etc.

  
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CARAMIA R. HART, ESQ.

Finz & Finz, P.C.

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