

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO:

MARY LORANG,

Plaintiff,

v.

JAHANGIR ASGHAR, M.D., and TENET FLORIDA
PHYSICIAN SERVICES II, L.L.C. d/b/a
PALEY ORTHOPEDIC & SPINE
INSTITUTE,

Defendants.

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, MARY LORANG, by and through undersigned counsel, sues Defendants, JAHANGIR ASGHAR, M.D. and TENET FLORIDA PHYSICIAN SERVICES II, L.L.C. d/b/a PALEY ORTHOPEDIC & SPINE INSTITUTE and states:

JURISDICTION, PARTIES & VENUE

1. This is an action for damages that exceed fifty thousand dollars (\$50,000.00), exclusive of interest, costs, and attorney's fees.
2. Plaintiff, MARY LORANG, at all times relevant, was a resident of Montgomery County, Texas, received the underlying medical care and treatment from Defendants in Palm Beach County, Florida, and is otherwise, *sui juris*.
3. At all times relevant, Defendant, JAHANGIR ASGHAR, M.D. (herein shall be referred to as "ASGHAR"), was a physician licensed to practice in the state of Florida, and actively practicing as a physician in Palm Beach County, Florida.

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550 South Andrews Avenue, Suite 630, Fort Lauderdale, Florida 33301

4. At all times relevant, Defendant TENET FLORIDA PHYSICIAN SERVICES II, L.L.C. d/b/a PALEY ORTHOPEDIC & SPINE INSTITUTE (herein shall be referred to as “PALEY INSTITUTE”) was a Florida for-profit corporation with an office for transaction of its customary business in Palm Beach County, Florida.

5. At all times relevant, Defendant ASGHAR was an employee and/or agent of PALEY INSTITUTE and was acting within the course and scope of said employment/agency.

6. Venue is proper in Palm Beach County, Florida because Defendants ASGHAR and PALEY INSTITUTE reside in the County.

7. All conditions precedent to the bringing of this action have occurred, have been waived, or have been otherwise satisfied, including the requirements set forth in Chapter 766.

8. Plaintiff would further allege that Defendants ASGHAR and PALEY INSTITUTE did not comply with the presuit requirements of Section 766 and failed to provide relevant information/documents that were requested during the presuit investigation.

FACTS GIVING RISE TO THE CLAIM

9. MARY LORANG presented to Defendant ASGHAR at PALEY INSTITUTE for neurological care and treatment.

10. The patient presented as a 51-year-old female with complaints of lower back pain and that her legs were “giving out.”

11. ASGHAR proceeded to recommend and perform a posterior spinal fusion from T10 to the pelvis with posterior spinal instrumentation from T10 to the pelvis; bilateral iliac bolts and lumbar decompression from L3-S1; bilateral TLIF at L4 L5 and L5 S1; and posterior column osteotomies from L2 L5, which were performed on September 21, 2021.

12. Following the procedure, the patient exhibited signs and symptoms of an acute footdrop, a neurological injury due to the surgery.

13. However, ASGHAR failed to appropriately and timely assess and work-up the patient for this neurological injury.

14. As a result of the care and treatment by ASGHAR, Plaintiff was severely injured, including suffering a permanent neurological injury, as well as needing additional corrective surgeries due to the delay in timely addressing the cause of the footdrop and multiple, severe, and ongoing infections due to the additional care caused by the first surgery, and was otherwise permanently and substantially injured.

COUNT I
NEGLIGENCE OF JAHANGIR ASGHAR, M.D.

15. Paragraphs 1-14 are adopted and restated as if fully set forth herein.

16. At all times relevant, Defendant ASGHAR owed a duty to MARY LORANG to provide that level of care, skill, and treatment which, in light of all relevant surrounding circumstances, is recognized as acceptable and appropriate by reasonably prudent similar health care providers.

17. Defendant ASGHAR breached that duty to MARY LORANG through one or more of the following acts or omissions:

- a) Post-operatively, failing to appropriately and timely diagnose, work-up, and treat the acute footdrop suffered by Plaintiff in the immediate post-operative period, which more likely than not was a result of the procedure performed by ASGHAR; and

b) Failing to appropriately follow-up with the Plaintiff in the ensuing weeks following the surgery, including failing to order an EMG on a timely basis in light of the Plaintiff's continued post-surgical footdrop.

18. It was foreseeable to Defendant that these acts and omissions would result in injury to MARY LORANG.

19. As a direct and proximate result of Defendant ASGHAR's negligence, Plaintiff MARY LORANG has in the past suffered and will in the future continue to suffer bodily injury, pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, and the expense of hospitalization, medical and nursing care and treatment, and aggravation of a pre-existing condition. These losses are permanent and continuing in nature and Plaintiff MARY LORANG will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, MARY LORANG, demands judgment against Defendant, JAHANGIR ASGHAR, M.D., for compensatory damages, costs of this action, post-judgment interest, and such further relief as this Court deems just and proper.

COUNT II
VICARIOUS LIABILITY OF PALEY INSTITUTE FOR ASGHAR

20. Paragraphs 1-19 are adopted and restated as if fully set forth herein.

21. At all times relevant, Defendant PALEY INSTITUTE is responsible and vicariously liable for the negligent acts, conduct, and omissions of its employees and/or agents acting within the course and scope of said employment/agency, including ASGHAR.

22. At all times relevant, ASGHAR was an employee and/or agent of PALEY INSTITUTE, was acting within the scope of said employment/agency of PALEY INSTITUTE, was under the control of PALEY INSTITUTE, and acting in furtherance of PALEY INSTITUTE's

interest, thereby making PALEY INSTITUTE vicariously liable for the negligent acts, conduct, and omissions of ASGHAR.

23. As a direct and proximate result of the negligence and breach of duty by ASGHAR, as employee/agent of PALEY INSTITUTE, Plaintiff MARY LORANG was permanently and severely injured.

24. As a direct and proximate result of the negligent acts, conduct, and omissions of Defendant PALEY INSTITUTE, by and through its employee/agent, ASGHAR, Plaintiff MARY LORANG has in the past suffered and will in the future continue to suffer bodily injury, pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, and the expense of hospitalization, medical and nursing care and treatment, and aggravation of a pre-existing condition. These losses are permanent and continuing in nature and Plaintiff MARY LORANG will continue to suffer these losses in the future.

WHEREFORE, Plaintiff, MARY LORANG demands judgment against Defendant, TENET FLORIDA PHYSICIAN SERVICES II, L.L.C. d/b/a PALEY ORTHOPEDIC & SPINE INSTITUTE, for compensatory damages, costs of this action, post-judgment interest, and such further relief as this Court deems just and proper.

DEMAND FOR TRIAL BY JURY

Plaintiff, MARY LORANG, demands a trial by jury of all issues so triable as a matter of right.

CERTIFICATE OF PLAINTIFF'S COUNSEL

The undersigned counsel hereby certifies that he has made a reasonable investigation as permitted by the circumstances which has given rise to his belief that grounds exist for the subject action against the Defendants named in this complaint.

DATED this 25th day of November, 2025.

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