1. Jagruk nagrik (Voluntary consumer association)

Through their managing trustee, P.V .Moorjani

Opp. LBS Vidyalaya, Near Prerna School,

Sangam karelibaug road, Vadodara

1. Farida bahan Yusuf Khan Pathan

Hathikhana Mahvat Faliya, Near Anaj market

Fatehpura, Vadodara.

[Date]

1. Dr Manubhai Vardiwala, Usha nursing Home

Mrudula Sadan, Pratap road,

Rampura Vadodara.

1. Dr Mukesh M. Tailor, Maitri hospital

Lab complex, near New India Mill,

Jetalpur road, Vadodara.

1. Shri Narhari Aarogya Kendra hospital,

Fatehganj, Vadodara

1. The Oriental Insurance Company Ltd.

201 / 202 Paradise complex,

Sayajigunj, Vadodara 3 90005

Subject: Complaint Regarding Medical Negligence and Demand for Compensation

Dear Sir/Madam,

I am writing to formally complain about the medical negligence faced by me.

I, Farida Banu Yusuf Khan Pathan, w/o late Yusuf Khan Abbas Khan Pathan, am constrained to issue this legal notice to you due to the negligence on your part in providing medical treatment to my husband, which ultimately led to his untimely demise.

On 08/09/2006, my husband suffered an injury to his leg. He was taken to Usha Nursing Home, where the doctor prescribed some medicine, but there was no improvement. He was later treated by Dr. Tejas Majboor for jaundice, and after laboratory tests, it was diagnosed that he was suffering from jaundice. On 17/09/2006, my husband had breathing problems, and I immediately tried to shift him to a nearby hospital. There were no doctors available, so I approached Maitri Hospital, where Dr. Mukesh M. Tailor examined my husband and started treatment. Dr. Tailor found that my husband's health had worsened. On his advice, my husband was shifted to Narhari Aarogya Kendra Hospital, as there were no ICU facilities at Maitri Hospital. Here, my husband was not admitted to the ICU. His condition became serious, and none of the doctors visited him. He died at 2:00 am on 18/09/2006.

My husband died because he was not admitted to the ICU by Narhari Aarogya Kendra Hospital, and there was no attendance by the doctor, despite being an emergency case. If timely and proper treatment had been given, he could have been saved. This was serious negligence on the part of all three healthcare providers involved in my husband's treatment. An expert medical opinion obtained on 04/04/2008 concluded that all three healthcare providers, namely Usha Nursing Home, Dr. Mukesh M. Tailor of Maitri Hospital, and Narhari Aarogya Kendra Hospital, had remained negligent and shown gross deficiency in rendering medical services to my husband.

My husband, Late Yusuf Khan Abbas Khan Pathan, died at the young age of 41. I have lost my financial, family, and personal support due to my husband's untimely demise, and I have to maintain my family with the little available pension. In view of the above facts and circumstances, I call upon you to pay the following amounts within 15 days from the date of receipt of this notice, failing which I shall be constrained to initiate legal proceedings against you without any further reference to you:

1. Rs. 15,00,000/- towards financial support for the loss of income and future earnings of the deceased
2. Rs. 1,00,000/- towards miscellaneous expenses for medical tests, etc.
3. Rs. 3,00,000/- towards compensation for causing tremendous mental agony.

Place: Vadodara

Dated: \_\_\_\_\_\_\_\_\_

Sincerely,

[Your Signature]

Jagruk Nagrik

[Your Signature]

Farida bahan Yusuf Khan Pathan