



**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN FRANCISCO**

**Document Scanning Lead Sheet**

Apr-29-2015 1:17 pm

Case Number: CGC-15-543481

Filing Date: Apr-29-2015 1:16

Filed by: ANNA TORRES

Juke Box: 001 Image: 04890154

**GENERIC CIVIL FILING (WITH FEE)**

**JUAN MONTIEL VS. HUSNI ALHAKIM ET AL**

**001C04890154**

**Instructions:**

Please place this sheet on top of the document to be scanned.

1 STEPHANIE M. PROFITT, State Bar No. 236602  
2 DEBRA D. LEW, State Bar No. 114537  
3 Office of the Treasurer & Tax Collector - Legal Section  
4 City and County of San Francisco  
5 P.O. Box 7426  
6 San Francisco, CA 94120-7426  
7 Telephone: (415) 554-7888 (Direct)  
8 Facsimile: (415) 554-5010  
9 E-Mail: Debra.Lew@sfgov.org

10 Attorneys for Lien Claimant  
11 CITY AND COUNTY OF SAN FRANCISCO

F I L E D  
Superior Court of California  
County of San Francisco  
APR 29 2015  
CLERK OF THE COURT  
Amaya Jones  
Deputy Clerk

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 CITY AND COUNTY OF SAN FRANCISCO

14 UNLIMITED JURISDICTION

15 JUAN MONTIEL,

16 Plaintiff,

17 vs.

18 HUSNI ALHAKIM, et al.,

19 Defendants.

Case No. CGC-15-543481

MEDICAL REIMBURSEMENT LIEN

(San Francisco Health Code Section 124)

20 CITY AND COUNTY OF SAN  
21 FRANCISCO, a municipal corporation,

22 Lien Claimant.

23 The CITY AND COUNTY OF SAN FRANCISCO, a municipal corporation, acting by  
24 its duly authorized Office of the Treasurer & Tax Collector, Bureau of Delinquent Revenue,  
25 ("City and County of San Francisco") hereby alleges the following in support of its medical  
26 reimbursement lien:

27 That Juan Montiel, a plaintiff herein, received emergency and/or hospital care and/or  
28 services from the City and County of San Francisco on January 5, 2013, and thereafter as a result  
of the injuries herein sued upon, and incurred charges in the amount of \$1,888.45 for medical  
and hospitalization, or related services rendered, which amount remains due and owing to the

1 CITY AND COUNTY OF SAN FRANCISCO.

2 That section 124 of the Health Code of the City and County of San Francisco provides  
3 that:

4 "Every person...who is given or shall receive aid directly or indirectly from  
5 public monies drawn through the Treasury of the City and County of San  
6 Francisco, shall be liable to the extent of his ability to pay as determined by  
7 Section 119 hereof, for the value of said aid so allowed, granted, or given, and if  
8 any of said aid granted to said person is for injury sustained by reason of an  
9 accident or wrongful act, the value of aid shall, if said person or other persons  
10 entitled to bring such action asserts or maintains a claim against another for  
damages on account of his or her injury or because of his or her death, constitute a  
lien upon the damages recovered, or to be recovered, either by judgment,  
settlement or compromise by said person, or by his or her heirs or personal  
representative in case of his or her death, or other persons lawfully entitled to a  
cause of action because of his or her death."

11  
12 WHEREFORE, the City and County of San Francisco, prays that its medical  
13 reimbursement lien in the sum of \$1,888.45, plus such amount as may be added for  
14 additional services, if any, be recognized and incorporated in any judgment, settlement or  
15 award obtained by the plaintiff herein.

16 This lien is for emergency and/or hospital care and/or services only and does not  
17 include the charges of other health care providers, including physicians' services billed by  
18 the San Francisco General Hospital Medical Group.

19 DATED: April 27, 2015

20  
21 By:   
22 DEBRA D. LEW  
23 Assistant Tax Collector Attorney

24  
25  
26  
27  
28 Attorney for Lien Claimant CITY AND  
COUNTY OF SAN FRANCISCO

**PROOF OF SERVICE**

I, Wah-Mei Lew, am a citizen of the United States, over the age of eighteen years and not a party to the within entitled action. I am employed at the San Francisco Office of the Treasurer & Tax Collector, 1 Dr. Carlton B. Goodlett Place, Rm. 110, San Francisco, California, 94102.

On April 21, 2015, I served the attached:

## **MEDICAL REIMBURSEMENT LIEN**

on the interested parties in said action, by placing a true copy thereof in sealed envelope(s) addressed as follows:

Cary O. Lindstrom  
65 East Taylor Street  
San Jose, CA. 95112

Thomas J. Feeney  
Carbone, Smoke, Smith, Bent & Leonard  
Attorneys At Law  
505 14<sup>th</sup> Street, Suite 600  
Oakland, CA 94612

and served the named document in the manner indicated below:

**BY UNITED STATES MAIL:** Following ordinary business practices, I sealed true and correct copies of the above documents in addressed envelope(s) and placed them at my workplace for collection and mailing with the United States Postal Service. I am readily familiar with the practices of the San Francisco Office of Treasurer and Tax Collector for collecting and processing mail. In the ordinary course of business, the sealed envelope(s) that I placed for collection would be deposited, postage prepaid, with the United States Postal Service that same day.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed April 19, 2015, at San Francisco, California.

Web Main Line

Wah-Mei Eew  
Senior Collection Officer  
Phone No. (415) 554-6904