

Notice of Civil Claim

Pu Justin Yang

October 6, 2024

Supreme Court of British Columbia

Vancouver Registry

Court File No.:

Between:

PU JUSTIN YANG (Plaintiff)

AND

**DR. FRANK L. HOU, ST. PAUL'S HOSPITAL, LIFELABS, VAN-
COUVER COASTAL HEALTH** (Defendants)

Part 1: Statement of Facts

1. Plaintiff's Background and Medical History

The Plaintiff, Pu Justin Yang, born January 20, 1990, underwent successful open-heart surgery in 1995 in Shanghai to correct a congenital heart defect. In August 2003, the Plaintiff immigrated to Canada with his family.

The Plaintiff has undergone **two kidney transplants** due to medical complications, including one in 2009 and a second in 2023 after the first transplant was rejected. The Plaintiff also suffers from spasticity and dysarthria secondary to an anoxic brain injury sustained as a child. A doctor's note dated October 1, 2024, written by Dr. Tharunamaya Abbu from RISE Community Health Centre, confirms these conditions and details the Plaintiff's reliance on assistive devices for mobility and communication (Exhibit A).

2. Events Leading to the Claim

On February 14, 2004, the Plaintiff was referred to Dr. Frank L. Hou, a family physician, by the UBC Marketplace Clinic for evaluation of heart-related symptoms. Dr. Hou failed to refer the Plaintiff to BC Children's Hospital for timely further treatment.

The Plaintiff suffered significant medical complications following cardiac surgery and the first kidney transplant, including a cardiac arrest in February 2005, resulting in severe disabilities. These complications were compounded by Dr. Hou's negligence during post-operative care and failure to take appropriate action when the Plaintiff was in distress.

The Plaintiff underwent a second kidney transplant in June 2023, following the rejection of the first kidney transplant, which was due to negligence by the Defendants in providing proper follow-up care.

Over the years, the Plaintiff endured multiple surgeries, two kidney transplants, and permanent physical and cognitive disabilities due to the Defendants' negligence, including improper monitoring, lack of follow-up, and failure to provide timely care.

The Plaintiff also suffered emotional distress, worsening his condition and preventing him from fully developing several innovations and projects.

3. Innovations and Losses

The Plaintiff has developed a range of groundbreaking innovations, including:

- Ultimate Abstract Cryptography (UAC)
- Galaxa Fusion
- Modular (metan-) Mathematical Object Based Micro-Chips
- Baby Self-Sufficiency System
- metan-Unicode[∞]Lang and metan-Unicode[∞]LangOS
- Infinite Iteration AI Perpetual Motion Machine Software Using Post-Quantum Computing
- FAMCS (Fully Automated Manufacturing Control System) and Updated Versions for Computer Chip Manufacturing
- Yang Quantum AI AR/VR Integrated Hardware Platform

These projects represent immense potential for financial gain, with projected total revenue of \$3.84025 trillion CAD over 20 years. Additionally, the Plaintiff suffered a loss due to his 10% ownership stake in ****Notion****, valued at \$72.5 billion CAD.

4. Loss of Community Health Support Services (2009–2020)

The Plaintiff did not receive necessary community health worker and home support services from 2009 to 2020, further delaying recovery and contributing to the rejection of the first kidney transplant in 2020.

Part 2: Relief Sought

1. General Damages: Compensation for the Plaintiff's pain, suffering, and permanent physical and cognitive disabilities resulting from the Defendants' medical negligence.

2. Special Damages: Compensation for past and future medical expenses, rehabilitation, ongoing dialysis treatments, and community health worker services due to the Plaintiff's long-term injuries and medical conditions.

3. **Loss of Future Earnings:** The Plaintiff estimates \$3.84025 trillion CAD in lost future earnings from delayed innovations and the loss of opportunity due to the 10% stake in Notion.

4. **Costs of Future Care:** Compensation for the anticipated costs of future care, including medical treatments, rehabilitation, dialysis, community health worker services, and other necessary medical procedures.

5. **Punitive Damages:** Punitive damages to hold the Defendants accountable for their gross negligence, misconduct, and failure to provide the appropriate standard of care.

6. **Interest and Costs:** Pre-judgment interest, post-judgment interest, and the costs of this action.

Part 3: Legal Basis

The Plaintiff asserts that the Defendants, by their actions and omissions, committed the following breaches of duty and caused significant harm to the Plaintiff:

1. **Negligence:** The Defendants breached their duty of care by failing to provide appropriate medical care, causing long-term injuries.

2. **Causation:** The Plaintiff's severe injuries, including brain damage and kidney failure, were a direct result of the Defendants' negligence.

3. **Damages:** The Plaintiff has suffered both economic and non-economic damages. Economically, the Plaintiff has lost potential profits amounting to \$3.84025 trillion CAD due to the delay in bringing his innovations to market. Non-economically, the Plaintiff has suffered immense physical and emotional pain and a permanent reduction in his quality of life.

4. **Punitive Damages:** The Defendants' failure to provide the appropriate level of care, despite knowing the Plaintiff's vulnerable condition, justifies punitive damages to punish the Defendants and deter similar conduct in the future.

Exhibits

Exhibit A: Doctor's Note from Dr. Tharunamaya Abbu, dated October 1, 2024, confirming the Plaintiff's medical condition and need for support.

Exhibit B: Medical Records detailing the Plaintiff's surgeries, cardiac arrest, kidney transplants, and treatments.

Exhibit C: Blood Work Reports demonstrating delays in treatment and negligence from healthcare providers.

Exhibit D: Correspondence between the Plaintiff and healthcare providers, highlighting negligence and delays in treatment.

Exhibit E: Financial Projections for the Plaintiff's innovative projects, demonstrating the estimated financial loss of \$3.84025 trillion CAD.

Exhibit F: Timeline of Medical Events showing key dates of treatments and delays that resulted in harm to the Plaintiff.