

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF WASHINGTON

3  
4 Jayakrishnan Nair, et al. ) CASE # C19-1296-MJP  
5 Plaintiffs, )  
6 v. ) MOTION TO AMEND PETITION AND  
7 Channa Copeland, et al., ) ADD/REMOVE PARTIES  
8 Defendants. )  
9

---

10 **I. SYNOPSIS**

11  
12 The Plaintiffs have obeyed this most Honorable Court's order to stop filing motion practice until  
13 all parties have been served, and pursuant to the order [Docket 37], have completed service on all  
14 remaining defendants [John Doe 1, skip traced as Roger Moore and served, John Doe 2, skip traced as  
15 Tedla Ukulele and served, as are City of Snoqualmie, Molina Healthcare, DSHS/APS and APS investigator  
16 Randy Wilson] before the deadline of December 20. The only defendant that could not be skip traced is  
17 Jane Doe 3, aka Masumi, a nurse at Harborview that held plaintiff Rajakumari Susheelkumar locked up  
18 in a room on the third floor as she was visiting her mother on July 5th, for 5 hours under false arrest.

19  
20 As "Masumi" presumably was acting under the instructions of Office of Risk Management's  
21 instructions following the Police Complaint she had filed on July 3rd against Paramount Shelter Home,  
22 which is also controlled by the same Office of Risk Management as Harborview Medical Center, which is  
23 a named defendant as well as DSHS/APS which is also a named defendant, Plaintiffs feel it is proper to  
24 remove "Masumi" from the defendants list if this Honorable Court requires so per the order to dismiss  
25 the parties not served by the deadline. Furthermore, this Honorable Court has also dismissed parties Dr.  
26 Paul Ramsey, Ermin Ciric and Regeimbal PLLC from C19-01577-MJP [Docket 20] on the basis of claim  
27 splitting, and advised Plaintiffs if they wished to instead include them in this lawsuit per applicable  
28 FRCP (Rule 19) and local rules (See lines 15-21, Page 4 of Docket 20). Plaintiffs are complying herein.

1 Furthermore, on [Docket 37] the Honorable Court had also noted that mails sent to Plaintiffs'  
2 home address in Redmond (11031 Elliston Way NE) had been returned. This is because Ms. Rajakumari  
3 Susheelkumar has since returned to India (after spending several months in the USA desperately  
4 pleading with the "guardian" as well as Harborview to allow her to see her mother possibly one last  
5 time, which was callously ignored). She has been traumatized by the turn of events and left USA in tears  
6 not knowing if she would ever see her mother alive again. Plaintiff Jayakrishnan Nair has also been  
7 under intense anxiety and depression, due to which he had not returned to his home since his sister left,  
8 as the sight of his mother's empty hospital bed and ambience has been too heart-breaking for him to  
9 bear. He has instead been living out of his office room in 8646 340th Way NE Redmond, as can be seen  
10 from declaration of Mr. Erdinc Uncar, a tenant renting one bedroom at this building, as can be seen from  
11 [Reference A]. The Post Office box had become full and some mails were returned (with due apologies),  
12 but he has since made arrangements to receive mail so the same address can be used for all mails  
13 hereon in. Plaintiffs are able to receive mails at both addresses (11031-home) and (8646-office).  
14

## 15 **II. STATEMENT OF FACTS**

16  
17  
18 After the dismissal of [C19-1307], Plaintiffs approached State Court to terminate the spurious  
19 guardianship and petitioned for a VAPO against the guardian, whose actions have resulted in Omana  
20 turning blind in her right eye (as Ms. Copeland was not available on March 21 to approve a critical  
21 followup procedure to her glaucoma surgery at ophthalmologist Dr. Chen's office to remove the bad  
22 blood vessels forming in the eye). She had also conspired with Roger Moore (administrator at  
23 Paramount) and Tedla Ukulele (the male "nurse" at Paramount") to withdraw her water, food and  
24 medicine to murder her as they viewed her as a liability to get rid of. Rajakumari had flown in from  
25 India based on her several threatening calls and emails to family in India to do the same, and found her  
26 mother dying exactly as Ms. Copeland had threatened to do. She called Paramedics and saved her, after  
27 Ukulele told her that he has instructions from Copeland and Moore to "let her pass away peacefully". She  
28

1 was in a horrendous state, unconscious, covered with blisters and lying in her own excreta, which had  
2 not been changed for days. Apparently this is the norm for this "facility" as it routinely murders several  
3 patients that cannot afford the costs of their healthcare, as can be seen from the reviews online<sup>1</sup>:

4 From Jacob J.:

5 *"Horrible Care - This facility neglected to turn an immobile friend of mine (their patient) every 2*  
6 *hours as required. Causing pressure ulcers and an **infection that went septic resulting in the***  
7 ***death** of my already immunocompromised friend."*

8 From Christina F.:

9 *"A TERRIBLE PLACE. **It is what nursing home nightmares are made of.** It is filthy, it smells, the*  
10 *food is beyond terrible (makes hospital food look great) the employees are absolutely non*  
11 *interested and negligent. I have heard people screaming for help and left on the floor. I am in the*  
12 *process of videotaping events there, and will be filing suit against them in the near future."*

13 From Elizabeth L.:

14 *"THE WORST NURSING HOME IN WASHINGTON STATE. I have witnessed residents smelling of*  
15 *feces and urine for hours at a time with not one of their aides stopping to check on them. I have*  
16 *heard residents yelling for help and not one person who walked by seemed the least bit concerned.*  
17 *The business office manager (the same "Mauri" who made the police report to stop Mr. Nair's*  
18 *visits and documentation of Omana's condition) is the most unprofessional person who was very*  
19 *condescending and abrupt. I dont understand how she can be this way when dealing with family*  
20 *members who are grieving and suffering every day trying to make ends meet while their loved ones*  
21 *are left there to be neglected and exploited. The activities supposedly taking place were always*  
22 *done half assed or not at all. If you decide to tour this building and aren't instantly turned off by the*  
23 *smell of urine and death, please request to go to the second and third floor....I couldn't even type*  
24 *this without vomiting in my mouth a bit"*

25  
26  
27  
28  
<sup>1</sup> <https://www.yelp.com/biz/leon-sullivan-health-care-center-seattle-2> (note this was recently renamed to Paramount)

1 Commissioner Velategui dismissed both actions, and allowed over \$40,000 in "attorney fees" for  
2 Mr. Ciric to appear on these two actions. Subsequently Family moved for a motion for revision, and that  
3 too was denied. In the interim, Nair got an arraignment notice for "Cyberstalking" out of Orting  
4 Municipal Court, for emails he sent in May (over six months ago) in which he had written very clearly  
5 that he is very concerned about his mother and NOTHING in his emails is intended to intimidate or  
6 threaten, and their only purpose was to save his mother from her plight at Paramount [Reference B].  
7 Furthermore, he wrote to her on June 5th that he will never be emailing her again (per which he hasn't),  
8 [Reference C] and instead he asked his sister to book emergency tickets to USA to save their mother  
9 from there and rest is well known to this Honorable Court. He has never made any contact, through  
10 phone or email or any other means to Ms. Copeland, other than the legal demand letter preceding this  
11 action. Therefore this frivolous Cyberstalking charge is an abuse of the Legal System to harass Mr. Nair,  
12 and only intended for the nefarious purpose of building a defense on this ongoing civil rights complaint.  
13 On December 17, Mr. Nair received an email [Reference D] from paralegal Rebecca Jenkins at Regeimbal  
14 PLLC, that they had taken out a new 5-year VAPO [Reference E] against him, disallowing all contact,  
15 albeit he had never received any service (or had any contact with his mother since July 5).

16  
17  
18 Petrified, he went to Court to get the documents filed in this case, and found there were two  
19 Returns of Service filed, first by one Maggie Xitco [Reference F] on 12/2 in which she has mentioned that  
20 Service COULD NOT BE made as the house at 11031 Elliston was vacant and the neighbors told her Mr.  
21 Nair had not been living there for a while (as aforementioned, he had moved to his office as he could not  
22 stay there alone without the memories and thoughts of his mother haunting him). From the court  
23 records, it appears that a hearing was noted by Ermin Ciric for December 13, and then amended and  
24 renoted for December 17, the same day Mr. Nair had to appear at Orting Municipal Case on the frivolous  
25 cyberstalking charge, for the obvious purpose of denying him a chance to appear, although he was not  
26 even aware of the court date at all thitherto. Mr. Nair's only information about the guardian seeking a  
27 new frivolous VAPO (although she had repeatedly maintained that she had no restrictions for Mr. Nair  
28

1 visiting his mother, as can be seen from declarations of TWO of his attorneys Dan Young [Reference H]  
2 and Paul Barrera [Reference G along with 8 Exhibits A-H], who both tried to accompany him to see his  
3 mother at Harborview but were both turned away by security guards proving she is being held  
4 completely incommunicado. She has not been allowed to meet with ANYONE she knows for SIX months!

5 **If this is not the quintessential definition of barbaric evil to a helpless quadriplegic, then what is?**

6 Furthermore, she had mentioned in email on May 15 [Reference I] that she would agree to  
7 return Ms. Thankamma to his home under his care if he would pay to reinstate her insurance and pay  
8 upfront for her care as before at his home - proving this new VAPO is yet another shameless, malicious  
9 and surreptitious abuse of the state legal system to buttress her defense in this Federal Case) was a  
10 reference in Regeimbal's response to his petition to terminate guardianship, as can be seen from his  
11 reply to their response in [Reference J]. The siblings had also filed a joint declaration in support of  
12 terminating the murderous guardianship [Reference K]. Then it appears that on December 16, i.e. day  
13 before the amended hearing date, Mr. Ciric filed a fraudulent Return of Service, signed by one Linda  
14 Baker [Reference L], in which she claims she had served Mr. Nair on December 13. Attached to this  
15 fraudulent Return on Page 3 is an email from Ms. Baker to Ms. Jenkins on December 4, stating that she  
16 was able to get the service done on the previous day. **Unless Ms. Baker has invented a time machine,**  
17 **how is it possible that she could email Ms. Jenkins on December 4th that she was able to complete a**  
18 **service on December 13th?** Furthermore, Mr. Ciric has **LIED** on the VAPO petition, filed on November  
19 20, that "personal service has been completed on Mr. Nair and the proof of service is attached".  
21

22 As is clear as daylight from the above, Mr. Ciric, Ms. Jenkins and Ms. Baker have clearly perjured  
23 themselves, and must be held criminally accountable for their declarations made under penalty of  
24 perjury. In addition to Mr. Erdinc Uncar's declaration [Reference A], attached herein is also proof from  
25 Google Timeline of his android Pixel 3 Smartphone, which shows he had never gone anywhere within a  
26 2 mile radius of his home on either December 3 or December 13 [Reference M]. As a matter of fact he  
27 had not budged an inch from his work location on both these dates, as shown by the timeline graph.  
28

1 All of this proves yet again that Mr. Ciric and Regeimbal PLLC, as was also noted earlier by  
2 Attorney Sheila Ridgway, are notorious for gaming the legal system by using such fraud practices for  
3 taking out ex parte orders without ever serving or notifying the other party, and using deceit and lies to  
4 make a complete mockery of the Courts. To protect the integrity of the legal system, it is absolutely  
5 imperative that they should be brought to justice and criminal charge of perjury be brought against  
6 them. Therefore Plaintiffs are seeking to amend the Petition to add Mr. Ermin Ciric, Regeimbal PLLC,  
7 Ms. Linda Baker of the "Baker Detective Agency LLC" to the Complaint for their criminal perjury on the  
8 Court for surreptitiously obtaining a back-door VAPO against Mr. Nair. Furthermore, Plaintiffs also wish  
9 to add the City of Orting for their negligent hiring of the private law firm "Walls Law Firm PLLC", which  
10 has abused its prosecutorial immunity for aiding and abetting this travesty of justice against Mr. Nair by  
11 prosecuting an entirely frivolous and nonsensical criminal charge of Cyberstalking when it is Ms.  
12 Copeland who had been harassing the Family with threats of murdering their mother (which she did  
13 even follow through on, as corroborated by scores of emails, photos, testimonies and medical evidence).  
14

### 15 16 **III. CONCLUSION & PRAYER**

17  
18 For the Foregoing Reasons, the Honorable Court should grant motion to make the following  
19 amendments to this Complaint (C19-01296):

- 20 1. Add Dr. Paul Ramsey (CEO of UW Medicine administering Harborview and Paramount),
- 21 2. Add Ermin Ciric and Regeimbal PLLC for devious pattern of making a complete mockery of Courts,
- 22 3. Add Linda Baker and Baker Detective Agency for penalty of perjury of a fraudulent declaration
- 23 4. Add City of Orting, as *respondeat superior* for frivolous complaint of Cyberstalking by Walls Law Firm.
- 24 5. Remove "Masumi / Jane Doe 3" as she could not be located for service.

25  
26 Submitted Most Sincerely

27 

**DECLARATION OF MAILING**

The undersigned declares under the penalty of perjury under the laws of the State of Washington, that the following is true and correct:

I am over the age of 18 and a legal permanent resident of the United States, and as of the date shown below, actual notice was made by me to all known parties of the above-entitled action by mailing a copy(ies) of the following documents:

1. Motion for Reconsideration

by two packets of U.S. Mail, and/or electronic mail, postage prepaid, as follows:

1. Ermic Ciric, Regimbal, McDonald & Young PLLC,

612 S. 227th St Des Moines WA 98198

2. Jennifer Boharski, Attorneys General Office,

800 5th Ave Suite 2000, Seattle, WA 98104

3. Brian P. Waters, Johnson Graffe Key Moniz & Wick, LLP,

925 Fourth Avenue Suite 2300 , Seattle, WA 98104-1158

DATED this 20th day of December, 2019.



Jayakrishnan Nair  
jknair@gmail.com  
(201) 205-7500 (Cell)