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6 CASE #: 26-2-09456-0 KNT

7 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
8 IN AND FOR THE COUNTY OF KING

9 JANE DOE 140, an individual; JANE DOE  
10 141, an individual; JANE DOE 142, an  
11 individual; JANE DOE 143, an individual;  
12 JANE DOE 144, an individual; JANE DOE  
13 145, an individual; JANE DOE 146, an  
14 individual; and JANE DOE 147, an  
15 individual,

16 Plaintiffs,

17 v.

18 PROVIDENCE ST. JOSEPH HEALTH, a  
19 Washington Nonprofit Corporation;  
20 PROVIDENCE HEALTH & SERVICES, a  
21 Washington Nonprofit Corporation;  
22 PROVIDENCE HEALTH & SERVICES –  
23 WASHINGTON, a Washington Nonprofit  
24 Corporation; KADLEC REGIONAL  
MEDICAL CENTER, a Washington  
Nonprofit Corporation; WESTERN  
HEALTHCONNECT, a Washington  
Nonprofit Corporation; and MARK E.  
MULHOLLAND, individually and on  
behalf of the marital community comprised  
of MARK E. MULHOLLAND and J. DOE  
MULHOLLAND,

Defendants.

No.

COMPLAINT FOR DAMAGES

## I. INTRODUCTION

1.1. Since 1949, Washington law has recognized that discrimination based on sex and national origin threatens not only the rights of individuals, but the very foundation of a free and democratic society. Abuse and discrimination by healthcare providers are particularly egregious forms of such discrimination—exploiting the unique power and trust inherent in the patient-provider relationship, and inflicting profound, lasting physical and psychological harm.

1.2. In this case, Defendants—both the physician and the healthcare institutions that employed and enabled him—betrayed their most basic legal and ethical duties to protect women seeking care from sexual exploitation and abuse. Plaintiffs came to Defendant Mark Mulholland, an obstetrician-gynecologist, for help. Instead, he sexually harassed, violated, and psychologically and physically harmed them under the guise of professional care. The institutions that employed and empowered him turned a blind eye to his misconduct and concealed it, allowing his abuse to continue unchecked.

1.3. Plaintiffs bring this action and pursue the following claims to hold Defendants accountable for enabling, obscuring, and perpetrating sex abuse and discrimination, and to seek justice for themselves and to protect other women from being similarly harmed: (1) violations of the Washington Law Against Discrimination; (2) corporate negligence; (3) medical battery; (4) medical negligence for breach of the standard of care; (5) medical negligence for failure to obtain informed consent; (6) intentional infliction of emotional distress; and (7) violations of the Washington Consumer Protection Act.

## II. PARTIES

2.1 Plaintiff Jane Doe 140 is a female residing in Umatilla County, Oregon.

2.2 Plaintiff Jane Doe 141 is a female residing in Benton County, Washington.

1           2.3     Plaintiff Jane Doe 142 is a female residing in Walla Walla County, Washington.

2           2.4     Plaintiff Jane Doe 143 is a female residing in Spokane County, Washington.

3           2.5     Plaintiff Jane Doe 144 is a female residing in Benton County, Washington.

4           2.6     Plaintiff Jane Doe 145 is a female residing in Franklin County, Washington.

5           2.7     Plaintiff Jane Doe 146 is a female residing in Benton County, Washington.

6           2.8     Plaintiff Jane Doe 147 is a female residing in Barron County, Wisconsin.

7           2.9     Defendant Providence St. Joseph Health (“Providence”) is a health system  
8 organized as a Washington nonprofit corporation. From its principal place of business in  
9 Renton, Washington, it owns and operates various entities through which it directs healthcare  
10 in countless communities and manages its more than 125,000 employees. Providence is the  
11 sole corporate member of and otherwise controls and operates Providence Health & Services,  
12 Providence Health & Services-Washington and by extension, Defendant Kadlec Regional  
13 Medical Center. Defendant Providence is a joint employer of Defendant Mulholland along  
14 with the other corporate defendants named herein.

15           2.10    Prior to 2014, Defendant Kadlec Regional Medical Center (“Kadlec”), also  
16 organized as a Washington nonprofit corporation, had been a community hospital serving  
17 patients in the Tri-Cities, Washington, area. Since 2014, Kadlec has been wholly owned and  
18 operated by Providence from Providence’s principal place of business in Renton, Washington.  
19 While Defendant Kadlec reports that the entity’s principal place of business is in Richland,  
20 Washington, all of its governing officers are Providence employees and officers. Defendant  
21 Kadlec owns and operates 22 facilities, including Kadlec Clinic - Associated Physicians for  
22 Women’s Health. Defendant Kadlec is a joint employer of Defendant Mulholland along with  
23 the other corporate defendants named herein.

1           2.11 Defendant Providence Health & Services (“Providence Health”) is a  
2 Washington nonprofit corporation with a principal place of business in Renton, King County,  
3 Washington. It owns and operates Kadlec Regional Medical Center. Kadlec Regional Medical  
4 Center includes Kadlec Clinic - Associated Physicians for Women’s Health in Tri-Cities,  
5 Washington. Defendant Providence Health is a joint employer of Defendant Mulholland along  
6 with the other corporate defendants named herein.

7           2.12 Defendant Providence Health & Services – Washington (“Providence Health  
8 Washington”) is a Washington nonprofit corporation with a principal place of business in  
9 Renton, King County, Washington. It owns and operates Defendant Kadlec in Tri-Cities,  
10 Washington. Defendant Providence Health Washington is a joint employer of Defendant  
11 Mulholland along with the other corporate defendants named herein.

12           2.13 Defendant Western HealthConnect is a Washington nonprofit corporation with  
13 a principal place of business in Renton, King County, Washington. Defendant Western  
14 HealthConnect is the sole corporate member of Defendant Kadlec Regional Medical Center.  
15 On information and belief, Western HealthConnect is an entity created, managed, and  
16 controlled by one or more of the Providence Defendants (as identified in paragraph 3.3) to  
17 form partnerships with “secular” or non-religious providers. On information and belief,  
18 Western HealthConnect owns, manages, and/or controls all or part of Defendant Kadlec  
19 Regional Medical Center’s operations.

20           2.14 Defendant Mark E. Mulholland, M.D. (“Mulholland”) is an employee and agent  
21 of the above-referenced corporate defendants. He is also a physician licensed in Washington  
22 since approximately 1999. On information and belief, Defendant Mulholland resides in  
23 Kennewick, Benton County, Washington.

1           2.15   At all relevant times, Defendant Mulholland has been married to J. Doe  
2 Mulholland and did the acts complained of in pursuit of financial gain or livelihood for himself  
3 individually and on behalf of and for the benefit of his marital community.

4           2.16   At all relevant times, Defendants Providence St. Joseph, Kadlec, Providence  
5 Health, Providence Health Washington, and Western HealthConnect (collectively,  
6 “Institutional Defendants”) employed Dr. Mark Mulholland and were employers under the  
7 Washington Law Against Discrimination, chapter 49.60 RCW (“WLAD”).

### 8                                   **III. JURISDICTION AND VENUE**

9           3.1    This Court has subject matter jurisdiction over this action pursuant to  
10 RCW 2.08.010 as Plaintiffs request legal relief exceeding \$300.00.

11          3.2    Venue is proper in King County, Washington under RCW 4.12.025.

12          3.3    The Institutional Defendants—Providence St. Joseph, Kadlec, Providence  
13 Health, Providence Health Washington, and Western HealthConnect—have a principal place  
14 of business and therefore “reside” in Renton, King County, Washington. They transact  
15 business and transacted business from their Renton offices at all relevant times. In addition,  
16 Defendant Kadlec’s operations are managed or controlled in whole or in part by Defendant  
17 Western HealthConnect. Moreover, Defendant Kadlec’s officers are comprised of officers  
18 employed and/or jointly employed by Defendants Providence, Providence Health, and  
19 Providence Health Washington (collectively, “Providence Defendants”). Defendant Kadlec is,  
20 therefore, also transacting business from the Providence Defendants’ principal offices in King  
21 County, Washington.

22          3.4    Plaintiffs elect not to submit this matter to arbitration. Please see Plaintiffs’  
23 attached declarations.  
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## IV. FACTS

### A. The Institutional Defendants

4.1 Beginning in around 1944, Kadlec hospital began serving the Tri-Cities, a Washington community. While it began as Richland Hospital, residents renamed it to honor Mr. Kadlec, a community member who gave his life for his work at Hanford.

4.2 In around 2014, Providence Defendants, or their other predecessor entities, acquired Defendant Kadlec, once a community-based hospital.

4.3 Prior to the Providence Defendants' acquisition of Kadlec, Kadlec acquired the Associated Physicians for Women's Health, which was a stand-alone medical group providing obstetrical and gynecological care to women in the Tri-Cities community. Kadlec also hired the medical group's employees and physicians. After Kadlec acquired the medical group, the clinic was renamed Kadlec Clinic - Associated Physicians for Women's Health.

4.4 As a result, after Providence Defendants' acquisition of Kadlec was finalized around 2016, the Providence Defendants owned, operated, and controlled Kadlec Clinic - Associated Physicians for Women's Health.

4.5 Since at least 2016, the Providence Defendants and Defendant Kadlec have jointly employed the physicians at Kadlec Clinic - Associated Physicians for Women's Health.

4.6 One of those physicians jointly employed by the Providence Defendants and Defendant Kadlec is Mark E. Mulholland, M.D. Defendant Mulholland provided medical care to female patients at facilities owned, operated, and staffed by the Institutional Defendants, including obstetrical and gynecological care. Plaintiffs were eventually such patients treated by Defendant Mulholland.

1           4.7     The Institutional Defendants are in the business of providing healthcare and are  
2     “healthcare providers” within the meaning of chapter 7.70 RCW. The Institutional Defendants  
3     provide healthcare through their employees and/or agents who are also “healthcare providers”  
4     within the meaning of chapter 7.70 RCW. The Institutional Defendants are vicariously liable  
5     for the acts and/or omissions of their agents and employees, including but not limited to  
6     Defendant Mulholland.

7           4.8     The Institutional Defendants provide facilities where medical services and care  
8     are provided to the public, and offer goods and services to the public, and charge for those.

9           4.9     The Institutional Defendants make decisions regarding human resources,  
10    policies, procedures, and the finances which are at issue in this case through their many  
11    employees and executives based in King County, over 500 of which are working out of its  
12    Renton headquarters.

13          4.10    In addition, the majority of Defendant Kadlec’s board members work out of  
14    King County, Washington, and from there, approved the very policy, personnel, and financial  
15    decisions at issue in this case. The rest of Defendant Kadlec’s board members reside outside  
16    of Washington in places including Montana, Illinois, as well as other places across the United  
17    States.

18          4.11    The Institutional Defendants are accredited by The Joint Commission (TJC), a  
19    nonprofit organization that accredits and certifies healthcare organizations and programs in the  
20    United States. TJC’s accreditation process involves rigorous evaluations of healthcare facilities  
21    to ensure they meet specific quality and safety standards. The Institutional Defendants publicly  
22    advertise their TJC “Gold Seal of Approval” on their website, broadcasting to the community  
23    that their facilities “must meet certain standards that ensure patient safety.”  
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1           4.12   TJC requires that accredited organizations treat any instance of sexual assault  
2 or abuse as a “sentinel event,” triggering a host of institutional obligations to TJC, including  
3 self-reporting. Sentinel events are subject to review by TJC and include suicides, homicides,  
4 infant abductions, unintended retention of foreign objects in a patient after an invasive  
5 procedure, or fires in the facility. Sentinel events require both reporting and responding to take  
6 immediate corrective action.

7           4.13   The Institutional Defendants claim not only that they are compliant with their  
8 TJC accreditation, but that they also have a clear “report card” with the TJC when it comes to  
9 patient safety.

10          4.14   In addition, the Institutional Defendants claim to consumers of healthcare that  
11 if there are any concerns about patient care, patients can report such concerns to a charge nurse  
12 or others in a department or clinic, and they make assurances that patient concerns will be  
13 addressed immediately.

14          4.15   The Institutional Defendants champion themselves as organizations that  
15 advocate for protection against sexual abuse, harassment, and discrimination. Not only did the  
16 Institutional Defendants signal to the community that they would act in accordance with their  
17 TJC obligations, but the Institutional Defendants made overt, express representations to the  
18 community about public safety and anti-discrimination practices. The Institutional Defendants  
19 solicited patients and healthcare customers from the general public and expressly and impliedly  
20 represented that they would be treated in conformity with Washington law: free from sexual  
21 harassment, assault, and discrimination. They made public commitments to “stamp[] out” and  
22 eliminate discrimination in their healthcare organizations.

1           4.16 In 2022, the Institutional Defendants participated in the Benton-Franklin  
2 Counties Community Health Needs Assessment. Providence Southeast Washington Chief  
3 Executive Officer Reza Kaleel—who oversees Kadlec—approved a governance document,  
4 which recognized that “racism and discrimination prevent equitable access to opportunities  
5 and the ability of all community members to thrive.” They also recognized discrimination as  
6 an obstacle to health.

7           4.17 Defendant Kadlec has a “Patient Rights and Responsibilities” policy that, in  
8 accordance with WAC 246-320-141, states that patients have the right to, among other things,  
9 “[b]e treated and cared for with dignity and respect.” The policy also states that patients have  
10 a right “to be free from all forms of mental, physical, sexual, or verbal abuse, neglect,  
11 harassment or exploitation.”

12 **B. Defendant Mulholland**

13           4.18 Defendant Mark E. Mulholland, M.D., is a native of the Tri-Cities, specifically,  
14 Kennewick, Washington.

15           4.19 Upon information and belief, Mulholland received his undergraduate degree  
16 from Washington State University, obtained his medical degree from Ohio State University,  
17 and completed his residency in obstetrics and gynecology at the University of Texas  
18 Southwestern Medical Center.

19           4.20 On November 12, 1999, the State of Washington issued Mulholland a license  
20 to practice medicine as a physician and surgeon. As of the date of this filing, Mulholland’s  
21 license to practice is currently “active with restrictions” and the Washington State Department  
22 of Health website states that enforcement action against him is “pending.”  
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1           4.21    On December 9, 1999, Associated Physicians for Women’s Health (“APW”) in  
2 Richland, Washington hired Defendant Mulholland. Despite ownership changes, APW  
3 remains the largest women’s healthcare group in the Tri-Cities area.

4           4.22    Upon information and belief, Defendant Mulholland and other physicians co-  
5 own the APW medical building.

6           4.23    At the time of his hiring, Defendant Mulholland was a Junior Fellow of the  
7 American College of Obstetricians and Gynecologists, a Member of the American Medical  
8 Association, and a Member of the Washington State Medical Association.

9           4.24    At the time of Defendant Mulholland’s hiring, APW publicly claimed, “We  
10 seek to serve our patients in a compassionate, cheerful and courteous manner. We strive to  
11 provide appropriate, high quality, convenient, and cost-effective services that constitute the  
12 best value for our patients. We endeavor to equip our staff with adequate training and a  
13 stimulating and supporting work environment and to foster cooperation and teamwork. We  
14 strive to always deal ethically with patients, employees, insurers, and all others with whom we  
15 do business.”

16           4.25    In 2006, Defendant Mulholland expanded his practice and began providing  
17 Botox and laser treatments at Advanced Cosmetic Therapies, which was affiliated with APW.

18       **C.     Complaints**

19           4.26    The Institutional Defendants claimed they provide “safe, compassionate care”  
20 and provide the highest standards in patient care. But they turned a blind eye to the very patients  
21 they serve. Well before Defendant Mulholland injured Plaintiffs, the Institutional Defendants  
22 had substantial notice that Defendant Mulholland was treating female patients in ways that fell  
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1 below the standard of care and constituted sexual abuse as well as sex discrimination and  
2 demonstrated a pattern of national origin discrimination.

3 4.27 Indeed, dating back to as early as 2003, the Institutional Defendants had  
4 received many complaints from female patients that Defendant Mulholland was abusing  
5 females as well as subjecting them to procedures or vaginal and rectal examinations which  
6 lacked medical need or purpose and which amounted to sex discrimination or assault.

7 4.28 In 2003, a patient complained that Defendant Mulholland shoved his fingers  
8 inside of her anus without informed consent or medical reason, saying while he penetrated her,  
9 “I’m going through the back.”

10 4.29 In 2012, a female patient complained to multiple employees of the Kadlec  
11 Defendants that Defendant Mulholland pulled down her pants and told her she had a “good  
12 body.”

13 4.30 In or around February 2013, a female patient reported that while she was in  
14 active labor, Defendant Mulholland humiliated her about her weight and, without warning,  
15 consent, or any discernible medical justification, abruptly inserted his fingers into her vagina.  
16 The patient reported that the contact was invasive, unnecessary, and experienced by her as  
17 sexual abuse.

18 4.31 In or around December 2015, a female patient reported to the Kadlec  
19 Defendants that Defendant Mulholland had been verbally abusive during her medical  
20 appointments, including shaming her for her weight and for receiving public assistance. The  
21 patient further reported that Defendant Mulholland conducted pelvic examinations without  
22 explanation and without first obtaining her consent. She stated that these examinations  
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1 continued for an unusually long duration and appeared to have no stated or discernible medical  
2 purpose.

3 4.32 In or around November 2017, a female patient reported that she presented to  
4 Defendant Mulholland for what she was told would be a camera-assisted vaginal examination.  
5 Instead, Defendant Mulholland performed a painful, hour-long “scraping” procedure inside her  
6 vagina without explanation or discernible medical purpose. The patient screamed in pain, the  
7 two nurses in the room ignored her, and Defendant Mulholland persisted with the scraping.  
8 Afterward, Defendant Mulholland told the patient that “the camera wasn’t working.” The  
9 patient subsequently reported the incident to another physician employed by the Institutional  
10 Defendants, who responded, “We have heard that about him before,” but took no further action.  
11 The physician did not inquire about the patient’s well-being and did not ask her to provide  
12 details or a written statement. The patient’s traumatizing experience was disregarded,  
13 consistent with the Institutional Defendants’ ongoing failure to investigate or protect patients  
14 from known reports of abuse.

15 4.33 According to another filed lawsuit, in 2017, a female patient complained to one  
16 of the nurses employed by the Institutional Defendants that Defendant Mulholland “examined  
17 her vagina without gloves on, restrained her from getting off the exam table by placing his  
18 hand on her pubic area and pushing her back down.” She also reported that he grabbed the  
19 inner part of her thigh and told her to “relax.”

20 4.34 In or around 2018, a female reported to employees of the Institutional  
21 Defendants that she suspected Defendant Mulholland was intoxicated while treating her at the  
22 hospital. The patient further reported that Defendant Mulholland discharged her from the  
23 hospital prematurely and, when she expressed concern about being sent home, he told her, “it  
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1 sucks to be you.” The following day, another physician re-admitted the patient and confirmed  
2 that she had been discharged before it was medically appropriate.

3 4.35 Also in 2018, a female patient complained to employees of the Institutional  
4 Defendants that Defendant Mulholland performed a pelvic exam without informed consent and  
5 stated that her vagina was “nice.”

6 4.36 In January 2019, a female patient complained via e-survey conducted by  
7 employees of the Institutional Defendants that Mulholland had verbally abused and “fat-  
8 shamed” her.

9 4.37 In April 2022, a female patient complained to a doctor and a nurse employed  
10 by the Institutional Defendants that Defendant Mulholland conducted a painful pelvic “exam”  
11 without explanation and stated he could not feel anything because she was “fat.” The doctor  
12 who received the complaint thankfully assisted the patient in filing an official complaint with  
13 the Institutional Defendants. But the Institutional Defendants failed to take action and  
14 continued to employ Mulholland.

15 4.38 The Institutional Defendants also received multiple complaints and, at times,  
16 demands from female patients referred to APW that they not be scheduled with Defendant  
17 Mulholland.

18 4.39 Rather than investigate the complaints and take appropriate action against  
19 Defendant Mulholland, the Institutional Defendants concealed the truth. They continued to lure  
20 their trusting patients into their hospital and examination rooms with full knowledge of  
21 Defendant Mulholland’s pattern of verbal and physical abuse of patients. The Institutional  
22 Defendants then billed for his abuses, masked as legitimate patient care.

1           4.40   The Institutional Defendants enabled and concealed Defendant Mulholland's  
2 pattern of sexual abuse. They were aware that supervisors, including APW Senior Manager  
3 Lisa Mallory ("Mallory"), routinely dismissed or discouraged female patients and staff from  
4 reporting Defendant Mulholland's misconduct. Rather than taking corrective action or  
5 ensuring that their facilities were the safe, respectful environments they publicly represented,  
6 the Institutional Defendants instead protected and empowered individuals—like Mallory—  
7 who actively suppressed complaints and obstructed documentation of Defendant Mulholland's  
8 abusive behavior.

9           4.41   The Institutional Defendants disregarded their duty to ensure non-  
10 discriminatory and safe healthcare for female patients and a workplace for female staff.

11           4.42   Although Defendants subsequently received numerous other complaints that  
12 Defendant Mulholland's treatment of women was nonconsensual, discriminatory, abusive, and  
13 amounted to sexual abuse, they failed to take any remedial action to address Defendants'  
14 treatment of and conduct as a corporation and as a healthcare provider to Plaintiffs and other  
15 female patients.

16           4.43   On April 29, 2025, the State of Washington Medical Commission filed charges  
17 against Defendant Mulholland for his unprofessional and abusive behavior towards three  
18 female patients. The charges alleged Defendant Mulholland engaged in a pattern of sexually  
19 inappropriate behavior toward these female patients, including improper and medically  
20 unnecessary comments about their physical appearance, sexual activity, and vaginas. The  
21 charges further alleged Defendant Mulholland inappropriately touched a female patient. The  
22 Commission noted that the healthcare institutions charged with supervising Defendant  
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1 Mulholland, the Defendants in this case, have often “rationalized, normalized, and minimized”  
2 the complaints made by female patients and staff.

3 4.44 On December 5, 2025, the State of Washington Medical Commission filed  
4 amended charges against Defendant Mulholland for his unprofessional and abusive behavior  
5 towards six additional female patients (totaling nine women). The amended charges allege  
6 Defendant Mulholland engaged in a pattern of sexually inappropriate behavior toward these  
7 female patients.

8 4.45 The Institutional Defendants were on notice of the Medical Commission’s  
9 charges against Defendant Mulholland. Despite the gravity of the charges, between April 29,  
10 2025, and June 6, 2025, the Institutional Defendants continued to permit Defendant  
11 Mulholland to “treat” patients.

12 4.46 On or about June 6, 2025, the Institutional Defendants approved a paid leave of  
13 absence for Defendant Mulholland, instructed staff that they were not to chart patients’  
14 complaints or concerns about care if they called in, and were prohibited from speaking with  
15 anyone except leadership about Mulholland.

16 4.47 On June 13, 2025, Mallory sent an internal email to APW staff stating  
17 Mulholland “is taking a leave of absence immediately.”

18 4.48 On June 16, 2025, Mallory sent another email instructing APW staff to be  
19 “respectful of his privacy” and say nothing more than “he is on leave” if asked.

20 4.49 On June 17, 2025, Mallory sent another email to APW, stating that it was  
21 inappropriate to “gossip[]” or “talk[] about one of your peers,” “and that the Tri-City Herald”  
22 (the local newspaper) was in the “business of selling copies.”  
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1           4.50    Later in the day, Mallory sent another email to APW staff, stating, “If patients  
2 call with concerns, do not place a phone message in their chart, just send myself or Danielle  
3 a[n] email.”

4           4.51    On September 16, 2025, the Medical Commission—through an interim  
5 stipulation with Defendant Mulholland—barred Defendant Mulholland from the practice of  
6 medicine with any female patient.

7           4.52    On information and belief, for decades, Providence—operating as a single  
8 health system across Oregon, Washington, and neighboring states—was aware of prior  
9 instances of sexual abuse by other male medical providers like Defendant Mulholland at other  
10 Providence facilities, long before many plaintiffs here were harmed. Yet Providence failed to  
11 implement adequate safeguards or monitoring systems, allowing further harm to patients. For  
12 example, as early as 2012, Providence was informed that Dr. David Farley—a family doctor  
13 in Oregon—was performing unnecessary pelvic examinations on minors. On information and  
14 belief, as early as 2003, Providence staff in Oregon witnessed Dr. Farley engage in abusive  
15 and unnecessary medical procedures. In the end, Dr. Farley likely harmed or abused hundreds  
16 of female patients. Dr. Farley has since been charged with numerous counts of sexual abuse in  
17 Clackamas County Oregon.

18   **D.    Mulholland Sex Discrimination, Abuse, and Negligent Medical Treatment of Ms.**  
19   **Doe 140**

20           4.53    Plaintiff Jane Doe 140 was referred to Defendant Mulholland after reporting  
21 frequent urination and problems sleeping.

22           4.54    During her first examination with Defendant Mulholland, he expressed shock  
23 and disbelief that Ms. Doe 140 had not noticed that her bladder had shifted into her vagina. He  
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1 said, "My God! It's presenting itself; how could you not tell?" Ms. Doe 140 felt blamed and  
2 demeaned; Defendant Mulholland made her feel "stupid."

3 4.55 He proceeded to ask Ms. Doe 140 detailed questions about her sexual intimacy  
4 with her husband and continued to express shock, asking, "Didn't your husband say anything?"  
5 Ms. Doe 140 apologized, noting that she does not normally stick her fingers in her vagina.  
6 Defendant Mulholland continued to solicit intimate and inappropriate details about her sex life.  
7 These questions made Ms. Doe 140 so uncomfortable that she had to abruptly tell Defendant  
8 Mulholland to stop with th sexual questions.

9 4.56 Defendant Mulholland recommended the placement of a bladder sling. He did  
10 not discuss or explain to Ms. Doe 140 whether any alternatives were available. Aside from  
11 identifying the need for a bladder sling, Ms. Doe 140 does not recall Defendant Mulholland  
12 explaining the procedure, describing what to expect, or discussing any potential risks  
13 associated with the sling or the procedure.

14 4.57 Ms. Doe 140 surgery was scheduled early in the morning<sup>4</sup>. Despite this, she was  
15 forced to wait for hours because Defendant Mulholland appeared to be overbooked. Her  
16 surgery finally occurred late in the afternoon that day. After the surgery, Ms. Doe 140 asked  
17 Defendant Mulholland if he placed the bladder sling, and, to her surprise, he said, "No." She  
18 expressed concern and told him that was the reason she was there. He apologized and said,  
19 "Oh, that's right. I got you confused with another patient. I've seen so many people today." He  
20 then released her with a catheter.

21 4.58 A few days after being discharged, Ms. Doe 140 experienced complications  
22 with her catheter. She was advised to return to Kadlec and to meet with Defendant Mulholland.  
23 He briefly met with Ms. Doe 140, asked her to urinate, and then rushed out, saying she was  
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1 fine. He said he was in a hurry because he had a softball game to attend. Ms. Doe 140 was not  
2 fine. She ended up having to go to the emergency room at a facility near her home, which is  
3 about 40 miles from the Tri-Cities.

4 4.59 Ms. Doe 140 later saw Defendant Mulholland for her post-surgical pelvic  
5 examination. There were two young, female staff present who seemed to be shadowing  
6 Defendant Mulholland. Defendant Mulholland asked Ms. Doe 140 to lie on her back so he  
7 could perform the exam. While his head was between her legs and he was examining the inside  
8 of her vagina, he told Ms. Doe 140 that she had a “beautiful vagina.” He was complimenting  
9 his work and making other inappropriate and cavalier remarks.

10 4.60 Defendant Mulholland’s remarks shocked Ms. Doe 140. She turned to the  
11 female chaperones in the room for help or affirmation that this behavior was inappropriate and  
12 unprofessional, but she was ignored. Instead, the chaperones stood there, refusing to make eye  
13 contact with Ms. Doe 140.

14 4.61 Despite the surgery with Defendant Mulholland, Ms. Doe 140 continued to  
15 experience similar symptoms. She did not want to see Defendant Mulholland again, so she saw  
16 another provider for an evaluation. She described her symptoms and shared that Defendant  
17 Mulholland said her vagina was “beautiful.” The female provider took Ms. Doe 140’s hand  
18 and said, “I’m sorry. No one should have ever said that to you, especially in his position.” Ms.  
19 Doe 140 felt validated.

20 4.62 The new provider noted that the surgery was done incorrectly. Ms. Doe 140 had  
21 to undergo a second surgery to correct the bladder sling. During the second surgery, she was  
22 informed that there was extensive scar tissue from Defendant Mulholland’s surgery, requiring  
23 the new provider to excise the scar tissue to work with healthy tissue.

1           4.63    As a result of Defendants' acts and omissions, Ms. Doe 140 suffered severe and  
2 ongoing emotional distress.

3 **E.     Mulholland Sex Discrimination, Abuse, and Negligent Medical Treatment of Ms.**  
4 **Doe 141**

5           4.64    Plaintiff Jane Doe 141 is a resident of Benton County, Washington.

6           4.65    She saw Mulholland three times during her second pregnancy in early 2020.

7           4.66    During her first visit, Mulholland made several crass comments about her  
8 weight and sexually charged comments. Jane Doe 141 felt like Mulholland was testing her to  
9 see how she would react to these comments. He said she was lucky to be able to conceive  
10 given her weight and that she was lucky to have found a partner, much less a husband.

11           4.67    During the second visit, Mulholland was very pushy about conducting a pelvic  
12 exam. He dismissed her pleas that she was uncomfortable with an exam and insisted that it  
13 was absolutely necessary to make sure the pregnancy was progressing safely. Jane Doe 141  
14 has a latex allergy and Mulholland claimed the hospital did not have any alternatives to latex,  
15 so he would have to conduct the pelvic exam with his bare hand. With one ungloved hand  
16 inside her vagina, he placed his other, ungloved hand on her hip, as if holding her down in a  
17 sexual way.

18           4.68    Mulholland also groped her breasts with ungloved hands, claiming he was  
19 doing a breast exam. He massaged her breasts in a sexual way.

20           4.69    Following the second visit, Jane Doe 141 called the hospital and told them how  
21 uncomfortable she was with Mulholland and that she wanted to see a different physician. The  
22 staff assured her she would see someone else at her next visit.

1           4.70   Despite this assurance, her next appointment was with Mulholland. Jane Doe  
2 141 refused to submit to another physical exam and told Mulholland everything with her  
3 pregnancy was fine. After this, Jane Doe 141 stopped going to APW altogether.

4           4.71   As a result of Defendants' acts and omissions, Ms. Doe 141 suffered severe and  
5 ongoing emotional distress.

6 **F.     Mulholland Sex Discrimination, Abuse, and Negligent Medical Treatment of Ms.  
7     Doe 142**

8           4.72   Plaintiff Jane Doe 142 lives in Walla Walla County, Washington.

9           4.73   In 2019, Ms. Doe 142 had a pulmonary embolism. She was referred to Kadlec  
10 for gynecological care, particularly to discuss her interest in obtaining an IUD, and also for  
11 chronic pelvic pain.

12          4.74   At her first meeting, Mulholland kept her waiting for an hour. She had drawn  
13 a diagram to illustrate where her pain was. Mulholland laughed at her diagram and dismissed  
14 her attempt to describe where she was hurting. He told her that the IUD would help.

15          4.75   Jane Doe 142 also talked to Mulholland about an issue she had had since she  
16 was a young girl. Because of internal pressure in her vaginal area, the act of walking could  
17 bring on an orgasm. Mulholland's response was this was to offer her a fist bump and say,  
18 "Cool."

19          4.76   When she returned for the IUD insertion and was positioning herself on the  
20 exam table, Mulholland unexpectedly grabbed her by her hips and pulled her down the table  
21 towards him. Jane Doe 142 does not remember Mulholland wearing gloves during one of the  
22 two exams.  
23  
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1           4.77    The décor in Mulholland’s office was deeply unsettling: pictures of his family  
2 dressed as Disney characters in contrast to his aggressive, dismissive, and inappropriate  
3 behavior.

4           4.78    As a result of Defendants’ acts and omissions, Ms. Doe 142 has suffered severe  
5 and ongoing emotional distress.

6       **G.     Mulholland Sex Discrimination, Abuse, and Medical Negligence of Ms. Doe 143**

7           4.79    Plaintiff Jane Doe 143 is a 44-year-old female living in Spokane County,  
8 Washington.

9           4.80    She saw Mulholland in 2018 due to pain from her IUD. Mulholland did not  
10 wear gloves when he gave her a pelvic exam.

11          4.81    Mulholland made several comments about how nice her figure was and did a  
12 breast exam for no apparent medical reason.

13          4.82    During her pelvic exam, he groped her inner thigh. He said her vagina a real  
14 tiger and growled at it.

15          4.83    Following the exam, Jane Doe 143 reported Mulholland’s behavior to the  
16 hospital support staff, but they just stared blankly at her.

17          4.84    As a result of Defendants’ acts and omissions, Ms. Doe 143 has suffered severe  
18 and ongoing emotional distress.

19       **H.     Mulholland Sex Discrimination, Abuse, and Negligent Medical Treatment of Ms.  
20 Doe 144**

21          4.85    Plaintiff Jane Doe 143 is a 25-year-old woman who lives in Benton County,  
22 Washington.

23          4.86    After Mulholland’s license to practice medicine was suspended on April 29,  
24 2025, she had an appointment with him on June 9, 2025 concerning her desire to have a

1 hysterectomy. She had suffered from chronic pelvic pain from age 11 and believed this would  
2 ease her symptoms.

3 4.87 Jane Doe 143 started off her conversation with Mulholland by explaining that  
4 she was gay and did not want children and was in constant pelvic pain. Mulholland told her  
5 that she would regret not having children and asked, "What if you wake up one day and you  
6 decide you're not gay?"

7 4.88 She asked Mulholland about post-surgical pain, and he told her not to be a baby  
8 about it.

9 4.89 Following this discussion, Mulholland performed a pelvic exam. Jane Doe 144  
10 expressed concern about bumps she had in her vagina. Mulholland tapped her clitoris and said,  
11 "Is this the bump you're talking about." He then said that that bump was what kept him up at  
12 night.

13 4.90 Jane Doe 144 turned to the chaperone in the room to see if they would intervene  
14 to stop the inappropriate conversation, but the chaperone would not make eye contact and took  
15 no action.

16 4.91 About a week before her scheduled June 18, 2025, hysterectomy, the hospital  
17 called to tell her that Mulholland would not be her doctor. They did not give any reason.

18 4.92 Immediately following her surgery, she was in a lot of pain. Her surgeon had  
19 assured her that they would give her medication to keep her pain under control. When she  
20 asked for pain medication, the staff refused to give her any. She escalated her concern and  
21 eventually told the staff they were being unprofessional to leave her pain unmedicated. The  
22 staff then told her that they would continue to withhold pain medication until she apologized  
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1 for calling them unprofessional. Jane Doe 144 was in so much pain she was forced to  
2 apologize.

3 4.93 As a result of Defendants' acts and omissions, Ms. Doe 144 has suffered severe  
4 and ongoing emotional distress.

5 **I. Mulholland Sex Discrimination, Abuse, and Negligent Medical Treatment of Ms.  
6 Doe 145**

7 4.94 Plaintiff Jane Doe 145, female, is currently 27-years old and is a resident of  
8 Franklin County, Washington.

9 4.95 She began seeing Mulholland when she was 14 years old, in about 2012.

10 4.96 Between 2019 and 2020 she saw him several times regarding pain and bleeding  
11 during intercourse. During these visits, Mulholland continuously asked her about her use of  
12 sex toys like cock rings and other devices she had not even heard of. Mulholland repeatedly  
13 urged her to start using these sex toys despite her repeated refusal to do so.

14 4.97 During one visit Mulholland did a pelvic exam. Without warning or consent,  
15 he roughly penetrated her anus with his finger. Jane Doe 145 immediately shot up and  
16 expressed pain. Mulholland finished the exam and told Jane Doe 145 that if she didn't feel  
17 pain when he penetrated her anus then she needed a therapist because her condition was  
18 probably mental.

19 4.98 As a result of Defendants' acts and omissions, Ms. Doe 145 has suffered severe  
20 and ongoing emotional distress.

21 **J. Mulholland Sex Discrimination, Abuse, and Negligent Medical Treatment of Ms.  
22 Doe 146**

23 4.99 Plaintiff Jane Doe 146 is 48 years old and resides in Benton County,  
24 Washington.

1           4.100 In 2016, Ms. Doe 146 became pregnant with her first child at the age of 39. Her  
2 regular APW provider referred her to Defendant Mulholland for obstetric care due to her  
3 advanced maternal age.

4           4.100 Ms. Doe 146 first visited with Defendant Mulholland sometime in the spring of  
5 2016. Her husband was present during the visit. While Defendant Mulholland was performing  
6 a vaginal exam, he leaned toward Ms. Doe 146's husband and said, "You should be proud;  
7 your wife's vagina doesn't look like it's been used," and then chuckled. His comment made  
8 Ms. Doe 146 feel objectified. He also told Ms. Doe 146 that her vagina "looked very nice."

9           4.101 Around May 2016, Ms. Doe 146 began experiencing sharp, stabbing pain in her  
10 left pelvic area. The pain was so severe that she checked into Kadlec's ER. The emergency  
11 providers could not determine the cause of her pain but advised her to follow up with her  
12 OB/GYN.

13           4.102 As instructed, Ms. Doe 146 scheduled a follow-up appointment with Defendant  
14 Mulholland. During the visit, Defendant Mulholland examined her vagina without the presence  
15 of a chaperone. Ms. Doe 146 does not recall whether he wore gloves when inserting his fingers  
16 into her vagina.

17           4.104 Defendant Mulholland dismissed Ms. Doe 146's reports of severe pain. He  
18 ignored her pain and failed to take steps to determine the cause. Instead, he said, "Pregnancy  
19 doesn't hurt like that; the pain comes when you deliver." He mocked and made fun of her,  
20 saying she was acting like a "baby." He barely asked Ms. Doe 146 any questions to determine  
21 the source of the pain. Ms. Doe 146 left feeling defeated and ignored.

22           4.105 The pain increased throughout her pregnancy. She reported the pain to  
23 Defendant Mulholland during subsequent visits, but he continued to ignore her complaints.  
24

1           4.106 Defendant Mulholland insisted on performing a vaginal exam during every pre-  
2 natal visit. During each exam, Defendant Mulholland made inappropriate sexual remarks about  
3 the appearance of her vagina, commenting that her vagina “looked really nice” and stating that  
4 he knew this because he “sees a lot of them.” These comments made Ms. Doe 146 feel  
5 uncomfortable and embarrassed. Defendant Mulholland moved his fingers inside her vagina  
6 for a prolonged period of time during each exam. He did not explain what he was doing or why  
7 the exam required prolonged digital penetration. She does not recall whether he wore gloves  
8 when he inserted his fingers inside her vagina.

9           4.107 Ms. Doe 146 gave birth in December 2016. The pain she had been experiencing  
10 throughout her pregnancy reached its peak. She was experiencing acute, incapacitating pain.  
11 While delivering, previously placed staples were expelled from Ms. Doe 146’s body.  
12 Defendant Mulholland said, jokingly, “Look at this—You gave birth to staples!”

13           4.108 Ms. Doe 146 suspects the staples were internal metallic staples that were placed  
14 after her gallbladder was removed in 2014. It seemed the staples became dislodged and were  
15 causing the stabbing pain. Ms. Doe 146 gave birth to her son, but nothing was done, said, or  
16 explained about the staples. No steps were taken to understand where the staples came from,  
17 whether additional staples were dislodged, or whether she would need to replace the lost  
18 staples.

19           4.109 Ms. Doe 146 did not understand why Defendant Mulholland failed to take steps  
20 to identify the cause of her pain or help mitigate her pain. Defendant Mulholland had access to  
21 her medical records. In 2025, after learning of publicly filed allegations of inappropriate  
22 conduct against the provider, she came to believe that Defendant Mulholland may have been  
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1 motivated by a desire to inflict pain. She believes he may have taken pleasure in causing her  
2 pain.

3 4.110 After experiencing the trauma of her pregnancy and birth, Ms. Doe 146 did not  
4 want more kids. She later met with Defendant Mulholland to discuss permanent birth control  
5 options. He said he “had a 100% success rate” with IUDs. He inserted an IUD, but Ms. Doe  
6 146 returned within a few days after she saw the IUD floating in the bathtub. Defendant  
7 Mulholland became irate, raising his voice and saying, “What are you trying to do—mess up  
8 my reputation?!” He asked prying and inappropriate questions about the kinds of sexual  
9 positions she used that would cause the IUD to fall out.

10 4.111 The IUD was improperly inserted, and Ms. Doe 146 became pregnant again.  
11 She asked APW to be assigned to another provider for her second pregnancy.

12 4.112 After the delivery of her second son, she met with Defendant Mulholland again  
13 after experiencing persistent vaginal pain. She complained that the pain was constant but  
14 increased during sex. He performed a quick vaginal exam. He said he did not see anything  
15 wrong but suggested that she have a hysterectomy to see if that helps. Defendant Mulholland  
16 did not discuss or explain to Ms. Doe 146 whether any less invasive alternatives to a  
17 hysterectomy were available, nor did he explain the risks and benefits of the procedure.

18 4.113 In 2022, Defendant Mulholland performed the hysterectomy, but it did not  
19 address her underlying pain. She still experiences the same pain today.

20 4.114 As a result of Defendants’ actions and omissions, Ms. Doe 146 has suffered  
21 severe and ongoing emotional distress.

22 **K. Mulholland Sex Discrimination, Abuse, and Negligent Medical Treatment of Ms.**  
23 **Doe 147**  
24

1           4.115 Plaintiff Jane Doe 147 is 45-years old and a resident of Barron County,  
2 Wisconsin.

3           4.116 By 2014, Jane Doe 147 had begun what is now 13 years of sobriety. As part of  
4 her recovery, she was taking better care of herself, including getting regular medical care. She  
5 learned that an earlier pap smear had showed an elevated risk of cervical cancer, so went to  
6 Mulholland for a new pap smear.

7           4.117 During this first meeting, Mulholland did a pelvic exam and told Jane Doe 147  
8 that she had the longest vaginal cavity he had ever seen and that it was very nice. Jane Doe  
9 147's now-ex boyfriend was in the room and noted what an unusual comment this was.

10          4.118 Jane Doe 147 began experiencing chronic pelvic pain and Mulholland  
11 recommended a partial hysterectomy both for the pain and to eliminate the risk of cervical  
12 cancer.

13          4.119 Mulholland performed the partial hysterectomy. At her post-operative meeting  
14 with Mulholland, he examined her and announced that, "your playground is back in service."  
15 Jane Doe 147 took this as a crude way of saying she could resume normal sexual activities.

16          4.120 When Jane Doe 147 continued to experience pain during intercourse, she saw  
17 Mulholland again. Mulholland diagnosed her as having damage to her vaginal wall and  
18 announced he was going to cauterize it. He did not explain the procedure nor offer Jane Doe  
19 147 any other options. He did not give her anything to numb the area nor any anti-biotics.

20          4.121 With Jane Doe 147 with her feet in the stirrups of the examination table,  
21 Mulholland very aggressively and roughly cauterized her vaginal wall. Between his shoving  
22 and Jane Doe 147's instinctive attempts to get away from the pain he was causing, she moved  
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1 to the other end of the table. It was obvious how much pain she was in, but Mulholland still  
2 did not offer her anything for the pain.

3 4.122 After leaving the hospital, Jane Doe 147 continued to suffer from frequent bouts  
4 of extreme pain. She returned to the emergency room several times, but each time the hospital  
5 assumed she was just seeking pain medication and had her leave without any treatment. After  
6 four or five of such visits, Jane Doe 147's condition had deteriorated so much that she was too  
7 weak to walk, and she had to be transported in an ambulance.

8 4.123 Still Mulholland and the other Defendant's refused to admit Jane Doe 147 or  
9 treat her in any way. Finally, an infectious disease doctor caught wind of what was happening  
10 and argued strenuously with Mulholland to allow tests and treatment. This doctor prevailed  
11 and tests revealed Jane Doe 147 had a massive infection from Mulholland's cauterization.

12 4.124 When she had recovered sufficiently, Mulholland and another surgeon  
13 performed another surgery under general anesthesia to try to repair Jane Doe 147's vaginal  
14 wall. When Jane Doe 147 was in recovery, a nurse assisting her discovered numerous odd  
15 bruises on Jane Doe 147's thighs. The nurses put her own fingers on the bruises to try to  
16 recreate the hand position that would have made the bruises. She asked Jane Doe 147, "What  
17 happened to you in there?"

18 4.125 Shortly after that surgery, Jane Doe 147 was preparing to move to Wisconsin,  
19 including gathering her medical records. As part of this, she received a CD from Kadlec of  
20 the surgery she had there. She later explained her medical history to another doctor in  
21 Richland, Washington, and gave him the CD to view. The doctor left the room, viewed the  
22 CD where Jane Doe 147 could not see, and apologized to Jane Doe 147 for the inappropriate  
23 actions of Mulholland during the surgery. He described Mulholland as "fingering her vagina."  
24

4.126 Jane Doe 147's medical records also include notes from Mulholland that she was not to be seen by any other physician. When Jane Doe 147 insisted that another doctor see her, she was told that if she fired one doctor from their group, in her case Mulholland, then she was firing the entire group.

4.127 Jane Doe 147 still experiences pain during intercourse. She also is periodically stricken with intense pain, similar to birth contractions. She does not understand how this can be given that her cervix was removed.

4.128 As a result of Defendants' acts and omissions, Ms. Doe 147 suffered severe and ongoing emotional distress.

## V. CLAIMS

**A. First Cause of Action: Violations of the Washington Law Against Discrimination, chapter 49.60 RCW - Institutional Defendants and Defendant Mulholland**

5.1 Plaintiffs restate and incorporate here each of the facts and allegations stated above.

5.2 Defendants' medical practices and facilities are places of public accommodation, as Washington's legislature and the courts interpreting the WLAD have defined them.

5.3 The Institutional Defendants' acts, omissions, treatment of, and/or conduct toward Plaintiffs, including the conduct of its employee and/or agent Defendant Mulholland—for which they are strictly liable—constitute separate acts in violation of RCW 49.60.215 for (1) sexual abuse, sexual harassment, and sexual misconduct and (2) disparate treatment on the basis of Plaintiffs' gender, including their failure to prevent and protect Plaintiffs, and failure to report, address, or correct a known pattern of sexual discrimination, sexual harassment, and/or sexual misconduct by Defendant Mulholland. Each such act or acts, singularly and/or

collectively, deprived Plaintiffs of their right as a customer and patient to fully enjoy the services and privileges offered by the Institutional Defendants.

5.4 The Institutional Defendants' acts, omissions, treatment of, and/or conduct against Plaintiff Jane Doe 124 for engaging in protected activity—in pursuing legal claims against one or more Defendants for discrimination—is prohibited by and in violation of the Washington Law Against Discrimination.

5.5 Defendant Mulholland is subject to personal liability for engaging in wrongful conduct. His conduct, acts, and/or omissions constitute independent, separate discriminatory acts and causes of action for (1) sexual abuse, sexual harassment, and sexual misconduct and (2) disparate treatment on the basis of Plaintiffs' gender.

5.6 As a result and proximate cause of the discriminatory acts and violations of chapter 49.60 RCW, Plaintiffs have been injured and damaged in an amount to be proven at trial, in which they are entitled to recover all actual and compensatory, economic and non-economic, special and general damages.

5.7 Plaintiffs are entitled to recover their costs, litigation expenses, and reasonable attorneys' fees against Defendants pursuant to chapter 49.60 RCW.

**B. Second Cause of Action: Corporate and Medical Negligence - Institutional Defendants**

6.1 Plaintiffs restate and incorporate here each of the facts and allegations stated above.

6.2 The Institutional Defendants, including their employees, nursing staff, administrators, and other healthcare providers engaged by them and acting in their interest, owed independent duties of care to Plaintiffs. Those duties include but are not limited to the duty to exercise reasonable care to (1) grant hospital admitting and treating privileges only to

1 competent doctors who do not sexually assault, abuse, and harass female patients, (2)  
2 periodically monitor and review Defendant Mulholland's competency, (3) intervene in the  
3 treatment of Plaintiffs and other female patients when the Institutional Defendants became  
4 aware of concerning reports of sexual abuse, negligence, and harassment, (4) not only adopt  
5 but enforce its policies and procedures to ensure patient safety and well-being, and (5) hire,  
6 train, and retain managers or supervisors who adhere to policies and procedures regarding  
7 complaints of sexual abuse, harassment, and/or assault. The Institutional Defendants breached  
8 one or more of these duties to Plaintiffs as they relate to the medical negligence, medical  
9 battery, sexual harassment, and abuse by:

10           6.2.1 Failing to comply with the standard of care in responding to and  
11 resolving issues with Defendant Mulholland as it relates to his sexual abuse and sex  
12 discrimination against patients;

13           6.2.2 Negligently steering female patients from the Kadlec Emergency  
14 Department to medical treatment with Defendant Mulholland, despite notice that he  
15 had a history of and had engaged in a pattern of misconduct and discriminatory  
16 practices with patients, inducing nonconsensual sexual contact, sexual harassment,  
17 battery and assault, verbal and physical harassment, abuse, and failure to obtain  
18 informed consent;

19           6.2.3 Failing to comply with CMS guidelines, rules, policies, regulations, as  
20 required of the Institutional Defendants, and indeed any institution accredited by The  
21 Joint Commission, in reporting or responding to reports of sexual harassment, battery  
22 and assault, sex discrimination, verbal and physical harassment and abuse, failure to  
23 obtain informed consent, or nonconsensual touching, with no medical need or purpose;  
24

6.2.4 Failing to provide staff sufficiently trained to adequately supervise and monitor the safety, physical condition, and well-being of Plaintiffs and other females, or to prevent or adequately address instances of harassment and abuse of women; and

6.2.5 Failing to take reasonable care in selecting, privileging, and supervising individuals who practice medicine in the Institutional Defendants' facilities.

6.3 As a result and proximate cause of the Institutional Defendants wrongful acts—including those of their employees, nursing staff, administrators, and/or agents—Plaintiffs have been injured and damaged in an amount to be proven at trial, in which they are entitled to recover all actual and compensatory, economic and non-economic, special and general damages.

**C. Third Cause of Action: Medical Battery - Institutional Defendants and Defendant Mulholland**

6.4 Plaintiffs restate and incorporate here each of the facts and allegations stated above.

6.5 Plaintiffs did not consent to the medical procedure(s) performed by Defendant Mulholland.

6.6 Defendant Mulholland intentionally performed a medical procedure that was unauthorized and offensive, under the guise of medical treatment, causing injury to Plaintiffs.

6.7 Defendant Mulholland's acts were a proximate cause of Plaintiffs' injuries.

6.8 The Institutional Defendants are vicariously liable for Defendant Mulholland's actions as the conduct occurred during, and as part of, his employment.

**D. Fourth Cause of Action: Medical Negligence for Breach of the Standard of Care - Institutional Defendants and Defendant Mulholland**

1           6.9     Plaintiffs restate and incorporate here each of the facts and allegations stated  
2 above.

3           6.10    Defendants owed a duty of care to Plaintiffs to exercise the degree of care, skill,  
4 and learning expected of a reasonably prudent physician and OB-GYN in Washington under  
5 the same or similar circumstances that existed at the time Plaintiffs were provided with medical  
6 services. Defendants failed to meet that standard of care. Defendant Mulholland was negligent  
7 in his treatment of Plaintiffs.

8           6.11    The Institutional Defendants are vicariously liable for the negligent acts and  
9 omissions of their agent and employee, Defendant Mulholland.

10          6.12    Defendants' negligent acts or omissions were a direct and proximate cause of  
11 Plaintiffs' injuries.

12 **E.     Fifth Cause of Action: Medical Negligence for Failure to Obtain Informed**  
13 **Consent - Institutional Defendants and Defendant Mulholland**

14          6.13    Plaintiffs restate and incorporate here each of the facts and allegations stated  
15 above.

16          6.14    Defendants owed a duty of care to Plaintiffs to secure their informed consent to  
17 ensure Plaintiffs were aware and fully informed of all material facts relating to the treatments  
18 discussed above, including all risks and alternatives. To the extent that Plaintiffs consented to  
19 any of the treatments described above, they did so without being aware of or fully informed of  
20 all material facts. A reasonably prudent patient under similar circumstances would not have  
21 consented to the treatments discussed above if informed of such material facts, including all  
22 risks and alternatives. Defendant Mulholland's failure to secure Plaintiffs' informed consent  
23 was a proximate cause of Plaintiffs' injuries.  
24

1           6.15    The Institutional Defendants are vicariously liable for the negligent acts and  
2 omissions of their agent and employee, Defendant Mulholland.

3           6.16    Defendants' negligent acts or omissions were a direct and proximate cause of  
4 Plaintiffs' injuries.

5   **F.    Sixth Cause of Action: Intentional Infliction of Emotional Distress - Institutional**  
6                                   **Defendants and Defendant Mulholland**

7           6.17    Plaintiffs restate and incorporate here each of the facts and allegations stated  
8 above.

9           6.18    Through a litany of complaints and reports about his behavior, the Institutional  
10 Defendants had notice of Defendant Mulholland's discriminatory misconduct toward female  
11 patients over the span of many years, prior to Plaintiffs' encounters with him.

12           6.19    Not only did the Institutional Defendants fail to report the prior allegations  
13 against Defendant Mulholland by female patients, as they were required to do by law, but they  
14 continued to affirmatively direct and schedule unsuspecting patients, like Plaintiffs, to his  
15 medical practice, on premises they controlled. This was intentional, extreme, offensive, and  
16 outrageous for a medical institution.

17           6.20    The Institutional Defendants benefited financially from concealing reports of  
18 Mulholland's behavior and retaining Defendant Mulholland by continuing to offer his services,  
19 and billing for same, at the detriment and expense of their female patients.

20           6.21    Defendant Mulholland's actions towards Plaintiffs were intentional, extreme,  
21 offensive, and outrageous for any medical provider, whose oath is first and foremost to do no  
22 harm.

23           6.22    All Defendants, by their acts and omissions, intentionally or with reckless  
24 indifference to the well-being of Plaintiffs, inflicted severe emotional distress on Plaintiffs.

1           6.23    The actions of Defendants as alleged above are so outrageous in character and  
2 so extreme in degree as to go beyond all possible bounds of decency, and to be regarded as  
3 atrocious and utterly intolerable in a civilized community.

4           6.24    As a direct and proximate result of the aforementioned acts and conduct of the  
5 Defendants, Plaintiffs have suffered and will continue to suffer extreme and severe emotional  
6 distress.

7   **G.    Seventh Cause of Action: Violation of the Washington Consumer Protection Act**  
8   **- Institutional Defendants and Defendant Mulholland**

9           6.25    Plaintiffs restate and incorporate here each of the facts and allegations stated  
10 above.

11          6.26    The Washington Consumer Protection Act prohibits unfair acts or practices in  
12 the conduct of trade or commerce. RCW 19.86.020.

13          6.27    The conduct, acts, and/or omissions of the Institutional Defendants and  
14 Defendant Mulholland constitute discrimination in a place of public accommodation under the  
15 Washington Law Against Discrimination, RCW 49.60.215, and thereby constitute per se  
16 violations of the Washington Consumer Protection Act, chapter 19.86 RCW. *See* RCW  
17 49.60.030(3) and *State v. Arlene's Flowers, Inc.*, 187 Wn.2d 804, 854 (2017) (Discrimination  
18 in a place of public accommodation under the WLAD is “an ‘unfair practice’ and a per se  
19 violation of the CPA.”).

20          6.28    Notwithstanding the Washington Law Against Discrimination and in the  
21 alternative, the conduct, acts, and/or omissions of the Institutional Defendants and Defendant  
22 Mulholland constitute an unfair practice in trade or commerce and an unfair method of  
23 competition that is contrary to the public interest and therefore violates the Washington  
24 Consumer Protection Act. RCW 19.86.020. The conduct described herein is injurious to the

1 public interest (1) because Defendant Mulholland injured other persons and/or had the capacity  
2 to injure other persons in the same fashion he injured Plaintiffs, (2) because the Institutional  
3 Defendants shielded, enabled, and protected Defendant Mulholland through affirmative acts  
4 and/or omissions and in so doing knowingly allowed him to injure other persons in the same  
5 fashion he injured Plaintiffs, and (3) because the Institutional Defendants solicited  
6 patients/customers/invitees and employees from the general public and expressly and/or  
7 impliedly represented that they would be treated in conformity with Washington law, be safe,  
8 and be free from harassment, assault, threats, intimidation, and coercion. RCW 19.86.093(c).

9 6.29 Defendant Mulholland is subject to personal liability for having participated in  
10 the wrongful conduct. *See State v. Ralph Williams' N.W. Chrysler Plymouth, Inc.*, 87 Wn.2d  
11 298, 322 (1976); RCW 19.86.080(1).

12 6.30 Defendants' actions constitute an unfair act or practice in trade or commerce  
13 and an unfair method of competition that runs contrary to the public interest of Washington  
14 State. Defendants' actions injured Plaintiffs, and they are therefore liable under the  
15 Washington Consumer Protection Act.

16 6.31 As a result and proximate cause of the violations of chapter 19.86 RCW,  
17 Plaintiffs have been injured and damaged, including to their business and/or property, in an  
18 amount to be proven at trial, for which they are entitled to recover all actual and compensatory,  
19 economic and non-economic, special and general damages, and treble damages.

20 6.32 Plaintiffs are entitled to recover their costs, litigation expenses, and reasonable  
21 attorneys' fees against Defendants pursuant to RCW 19.86.090.

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**VI. DAMAGES**

7.1 As a direct and proximate result of Defendants' acts and omissions, Plaintiffs are entitled to be compensated for special and general damages for their past bodily injury and past physical pain, past and future healthcare expenses and wage loss proximately caused by Defendants as well as for suffering, emotional distress, loss of enjoyment of life, anxiety, depression, personal injuries, humiliation, and anguish which occurred in the past and are continuing.

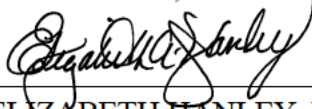
**VII. PRAYER FOR RELIEF**

Plaintiffs pray for judgment of liability in their favor and for an award of all available relief, against Defendants as follows:

- A. For general and special damages in an amount to be proven at trial;
- B. For attorneys' fees, costs, disbursements, and litigation expenses;
- C. For prejudgment interest on all damages on which pre-judgment interest is available under the law;
- D. For post-judgment interest;
- E. For exemplary, liquidated, treble, and punitive damages as applicable;
- F. And for all other and further relief this Court deems just and equitable.

DATED this 19th day of March, 2026.

SCHROETER, GOLDMARK & BENDER

  
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