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Attorney for Plaintiff, in pro per

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

JOHN DOE,
Plaintiff,

vs.

LIOR ZOREA, DOUG RAPPAPORT,
GREGORY DESCHENES, NIXON
PEABODY LLP, PLANNED PARENTHOOD
SAN FRANCISCO, DOES 1-20
Defendant

Case No.: Number

COMPLAINT FOR DAMAGES

Herein comes plaintiff who files under the protection of a pseudonym for privacy reasons pursuant to:

- CAL. CODE CIV. PRO. § 367: “Every action must be prosecuted in the name of the real party in interest, except as otherwise provided by statute.”
- *Doe v. Roman Catholic Archbishop of Cashel & Emly*, 99 Cal. Rptr. 3d 158 (Cal. Ct. App. 2009) – Does claim sexual abuse by priest, and appeal the finding of no jurisdiction by the trial court over the Irish seminary where the abusive priest was trained. No discussion of pseudonymity.

- *Doe v. Roe*, 267 Cal. Rptr. 564 (Cal. Ct. App. 1990) – Doe and Roe were a couple; Doe sues for the negligent transmission of herpes. The court notes: “By stipulation of the parties and order of this court the parties have been designated by fictitious names to protect their privacy.” Id. at 564 n.1.

FACTUAL BACKGROUND

- 1) Lior Zorea, is a high powered tech founder attorney who resides in San Francisco and, who used his position of authority to attract plaintiff’s pregnant wife to his home under the rouse of helping her with insurance and legal issues involving her healthcare benefits from a place that was transferring carriers.
- 2) Lior Zorea, instead served her alcohol that mixed with her prescription, telling her that her husband legal status and current job prevented him “being able to afford a baby.”
- 3) Lior Zorea, recognizing her inebriated state had inappropriate and intimate conduct with her and her 3 month wombed child.
- 4) Upon completing his deprived acts, he induced her to have an abortion of preplanned for pregnancy while the child was wombed for 3 months, after a healthy sonogram two days prior, and in a happy marriage, at the age of 36.
- 5) Lior Zorea, aided her in scheduling it without plaintiffs knowledge, consent, or information.
- 6) Lior Zorea, then messaged her “your box is hot” to suggest he enjoyed the depravity of an extra-marital affair with a pregnant woman. He also then messaged her, “good luck on the procedure.”

- 1 7) Two weeks before the Bob Lee's retributive murder, Lior Zorea hired famed
2 criminal defense attorney Doug Rappaport, who sent a threatening letter disguised
3 as a cease and desist.
4
- 5 8) Doug Rappaport mischaracterized an invitation to a therapeutic discussion
6 through religious leaders involving members of both Lior Zorea, plaintiff, and
7 Doug Rappaport, religious belief as criminal threat.
8
- 9 9) Thereby Doug Rappaport, used the threat of administrative process in a criminal
10 proceeding to gain an unfair advantage in a criminal and civil matter, when in fact
11 plaintiff was trying to understand the drastic change in his wife's personality and
12 behavior.
13
- 14 10) Plaintiff informed defendant's Lior Zorea, Doug Rappaport, Gregory Deschenes,
15 and Nixon Peabody of the mental state of his spouse since the incident, who prior
16 to was the Chief Medical Officer, of a large clinic with over 4000 patients,
17 Female Doctor of the Year for the prior year, and other accolades, but since the
18 incident she spiraled mentally and physically until involuntarily hospitalized and
19 under suicide watch by plaintiff and his spouse's mother.
20
- 21 11) Despite this information defendant's Lior Zorea, Doug Rappaport, Gregory
22 Deschenes, and Nixon Peabody, contacted plaintiff's spouse under the rouse of
23 legal advice but now for a divorce, wherein Lior Zorea under the advice of Nixon
24 Peabody, through Gregory Deschenes, and his personal criminal defense lawyer
25 Doug Rappaport, had a declaration signed protecting themselves. Plaintiff's
26 spouse attended the meeting for legal help with her now desire to divorce.
27
28

1 12) Planned Parenthood is sued herein for wrongfully performing an abortion on a 3
2 month old wombed child, in a pre-planned pregnancy, between married couples
3 wherein no informed consent was sought, and Planned Parenthood was further
4 informed that the spouse (patient) was unable to consent due to being on
5 medication (Prozac) according to their own website.
6

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8 CAUSE OF ACTION (ONE)

9 13) Plaintiff JOHN DOE incorporates each and every paragraph 1-12 of this pleading
10 herein and, alleges that defendants, and each of them, was the legal (proximate)
11 cause of damages to plaintiff. By the following acts or omissions to act,
12 defendant intentionally caused the damage to plaintiff on February 5, 2023
13 defendant's apartment at 388 Beale Street in San Francisco CA.
14

15
16 • PRAYER FOR RELIEF

17 That the court determine that defendant, and each of them, is liable for damages herein described
18 and award according to proof, punitive and exemplary damages in excess of \$25,000 (Unlimited
19 Jurisdiction), attorney fees and cost.

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21 September 26, 2024

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Jonathan Fried, Attorney for Plaintiff, in pro per
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