

Exhibit 1

Unofficial Copy Office of Marilyn Burgess District Clerk

CAUSE NO. _____

ANNELISE CAMP, AN
INCAPACITATED
PERSON, AND JOY CAMP AND
JOHNSTON CAMP,
AS NEXT OF KIN ON HER BEHALF

Plaintiffs,

vs.

TEXAS CHILDREN'S HOSPITAL
and TEXAS CHILDREN'S HOSPITAL
WEST CAMPUS and
DR. MONA KARIMULLAH, M.D.

Defendants.

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

_____ JUDICIAL DISTRICT

**PLAINTIFF'S VERIFIED ORIGINAL PETITION AND APPLICATION FOR
TEMPORARY RESTRAINING ORDER AND INJUNCTIVE RELIEF**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES ANNELISE RAMONA CAMP ("Annelise"), and her parents JOY CAMP and JOHNSTON CAMP ("the Camps") (collectively "Plaintiffs"), on her behalf, files this Original Petition and Application for Temporary Restraining Order and Injunctive Relief, seeking injunctive relief against Defendants Texas Children's Hospital and Texas Children's Hospital West Campus and Dr. Mona Karimullah, M.D. ("Defendants") as follows:

**I.
DISCOVERY CONTROL PLAN**

Plaintiffs intend to conduct discovery under Level II of Texas Rules of Civil Procedure 190.3 and affirmatively plead that the expedited-actions process in Texas Rule of Civil Procedure 169 does govern this suit. Plaintiff does not seek economic damages, only a restraining order.

II. **PARTIES**

Plaintiff, Annelise, and her parents, the Camps, are residents of Harris County, Texas. Annelise is currently admitted to a hospital in Harris County, Texas.

Defendants Texas Children's Hospital and Texas Children's Hospital West Campus are non-profit corporations, with its corporate headquarters situated within Harris County, Texas and its principal place of business located in Harris County, Texas. Issuance of a citation for private process is hereby requested from the Harris County District Clerk. Issue citation to: Texas Children's Hospital by serving its Registered Agent CAPITOL CORPORATE SERVICES, INC. at 1501 S. Mopac Expy, Suite 220, Austin, Texas, 78746 and Texas Children's Hospital West Campus by serving its Registered Agent, Lance A. Lightfoot, at 6651 Main Street, Suite E520 Houston, Texas 77030.

Defendant Mona Karimullah, M.D. is an individual physician who is an employee of Baylor College of Medicine, whose registered agent is CT Corporation System, located at 1999 Bryan St., Suit 900, Dallas, TX 75201.

III. **JURISDICTION AND VENUE**

The subject matter in controversy is within the jurisdictional limits of this Court.

This Court has jurisdiction over Defendants Texas Children's Hospital and Texas Children's Hospital West Campus because said Defendants are Texas entities conducting business in Harris County, Texas. This Court also has jurisdiction over Defendant Mona Karimullah, M.D. because said Defendant practices medicine in Harris County, Texas.

Venue in Harris County is proper in this cause pursuant to Section 15.002 of the Texas Civ. Prac. & Rem Code because a substantial part of the events or omissions giving rise to this lawsuit occurred in this county.

IV. FACTS

Annelise is a 2-year-old resident of Harris County, Texas. On Monday, May 25, 2026, Annelise was found in a pool, unresponsive. Paramedics arrived on the scene and performed CPR, which was successful. Annelise's heart started beating again, and she was transported to Texas Children's Hospital West Campus ("Texas Children's") the same day. Since Annelise has been at the hospital, her heart has been working, but she is currently dependent on a ventilator. Her organs have not shut down. On approximately May 27th, an employee at the hospital shined a light in Annelise's eyes, and one of her pupils responded to the stimulus.

On or about May 28th, 2026, Texas Children's Hospital West Campus determined that Annelise's medical treatment, including all Life-Sustaining Treatment, will be discontinued over the objections of her parents. Annelise is to be removed from her life-sustaining treatment tomorrow morning on May 29th, 2026. Plaintiff has asked Texas Children's Hospital West Campus to stop all brain death testing, including the apnea test, as well as requesting additional time to find alternative options and treatment for Annelise. The parents also requested complete medical records for an independent medical review.

Defendants are relying on the results of one CT scan conducted on May 25, 2026 to form their brain death diagnosis which is against the standard set by the American Academy of Neurology.

Annelise is to be removed from his/her life-sustaining treatment on the morning of May 29th, 2026. Her father, Johnston has asked Texas Children's Hospital West Campus for

more recovery time before conducting any further testing for the purposes of declaring Annelise brain dead. Texas Children's Hospital West Campus has thus far refused, continuing to insist on moving forward with plans to conduct testing to remove Annelise from life-sustaining treatment over the express wishes and the objections of the Camps, Annelise's parents and surrogates.¹

Texas law states that "if artificial means of support preclude a determination that a person's spontaneous respiratory and circulatory functions have ceased, the person is dead when, in the announced opinion of a physician, according to ordinary standards of medical practice, there is irreversible cessation of all spontaneous brain function. Death occurs when the relevant functions cease."² Declaring legal death by neurological criteria requires the "irreversible cessation of all spontaneous brain function."³ Standard medical practices, including those established by the Uniform Determination of Death Act, dictate that death requires "irreversible cessation of all functions of the entire brain, including the brain stem."⁴ The American Academy of Neurology corroborated this Act in a 2010 study.⁵ ANNELOSE CAMP is showing signs of life, including a steady heartbeat and signs of organ health.

V.

¹ Due to the emergent nature of this matter, a verification is being obtained concurrently with the filing of this pleading. That verification will be filed with the court as soon as obtained, and will be incorporated herein as if filed contemporaneously.

² Texas Health and Safety Code, Section 671.001(b).

³ *Id.*

⁴ See National Conference of Commissioners on Uniform State Laws. Amendments to Uniform Brain Death Act, Uniform Determination of Death Act, 1980; <https://www.uniformlaws.org/HigherLogic/System/DownloadDocumentFile.ashx?DocumentFileKey=4d19d096-be64-3c0f-ae71-a514b64c06a6>. See also

⁵ See <https://n.neurology.org/content/74/23/1911>; <https://doi.org/10.1212/WNL.0000000000006750>.

V.
TEMPORARY RESTRAINING ORDER

The purpose of a temporary restraining order is to preserve the status quo of the subject matter of the litigation until a preliminary hearing can be held on an application for a temporary injunction. *Cannan v. Green Oaks Apts., Ltd.*, 758 S.W.2d 753, 755 (Tex. 1988) (*per curiam*). The purpose of a temporary injunction is to preserve the status quo of the subject matter of the litigation until a final hearing can be held on the merits of the case. *Butnaru v. Ford Motor Co.*, 84 S.W.3d 198, 204 (Tex. 2002). The status quo is defined as “the last, actual, peaceable, noncontested status which preceded the pending controversy.” *In re Newton*, 146 S.W.3d 648, 651 (Tex. 2004) (quoting *Janus Films, Inc. v. City of Fort Worth*, 358 S.W.2d 589 (Tex. 1962) (*per curiam*)) (internal quotations omitted).

Whether to grant or deny a temporary injunction is within the trial court’s sound discretion. *Walling v. Metcalfe*, 863 S.W.2d 56, 58 (Tex. 1993); *State v. Walker*, 679 S.W.2d 484, 485 (Tex. 1984). A reviewing court should reverse an order granting injunctive relief only if the trial court abused that discretion. *Walling*, 863 S.W.2d at 58; *Walker*, 679 S.W.2d at 485.

In order to obtain a temporary restraining order and a temporary injunction, an applicant must show: (1) a cause of action; (2) a probable right to the relief requested; and (3) imminent irreparable harm in the interim. *Bell v. Texas Workers Comp. Comm’n*, 102 S.W.3d 299, 302 (Tex. App.—Austin 2003, no pet.) (citing *Butnaru*, 84 S.W.3d at 204). Plaintiffs are able to establish each of these elements and are therefore entitled to injunctive relief.

Plaintiffs incorporate by reference as set forth at length herein all the above factual allegations.

Plaintiffs request the Court to intervene and issue an order to Texas Children’s to keep the status quo and continue to provide medical care to Annelise for at least fourteen days in order to

allow Plaintiff some time to find a physician to provide a second opinion and a hospital that will accept the transfer or time to find alternative options and treatment for Annelise. If Defendants are allowed to discontinue Annelise's treatment, she will suffer irreparable injury of almost certain death. Annelise has no adequate remedy at law because damages cannot adequately compensate her and her father for the loss of her life. *See Butnaru*, 84 S.W.3d at 214 ("An injury is irreparable if the injured party cannot be adequately compensated in damages or if the damages cannot be measured by any certain pecuniary standard."), citing *Canteen Corp. v. Republic of Tex. Props., Inc.*, 773 S.W.2d 398, 401 (Tex. App. – Dallas 1989, no writ.). Unless the Court issues the Temporary Restraining Order, irreparable harm will happen to Plaintiff. This Temporary Restraining Order should issue without notice and without a hearing thereon. As Texas Children's intends to terminate life support tomorrow morning, May 28, 2026, this irreparable harm is imminent.

Unless the Court enters a Temporary Restraining Order restraining Defendant from refusing to provide life-sustaining treatment, Annelise will die. This Court should restrain Defendants, their physicians, contractors, subcontractors, agents, servants, employees, experts and/or those acting in concert with them from refusing to provide life-sustaining treatment to Annelise while this Court resolves this dispute. Unless the Court issues the Temporary Restraining Order, irreparable harm will happen to Annelise.

1. Application for Extension of Time Pursuant to Standard Medical Practice

Texas law states that there must be complete, irreversible cessation of all spontaneous brain function, which includes all areas of the brain, including the brain stem. Texas law further states that a brain death diagnosis must follow standard medical practice.⁶ The American Academy of

⁶ Texas Health and Safety Code, Section 671.001(b).

Neurology (AAN), a well-respected authority on neurology, recommends 28 days to show that a brain injury is irreversible.⁷ Annelise should be given additional recovery time, pursuant to standard medical practice and the instructions of her surrogate decision-maker, her parents, the Camps.

2. Application for Second Opinion, Transfer, or Other

Given the lack of trust of the medical personnel at Texas Children's West Campus, the family requests a second opinion from a neurologist not affiliated with Defendant, as well as a transfer to another facility.

VI. **CONCLUSION AND PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that:

1. A Temporary Restraining Order be issued without notice to Defendants Texas Children's Hospital and Texas Children's Hospital West Campus and Dr. Mona Karimullah, M.D., restraining Defendants, their contractors, subcontractors, agents, servants, employees, experts and/or those acting in concert with them from refusing to provide life-sustaining treatment to Plaintiff, to keep the status quo while this Court resolves this dispute.
2. Defendants Texas Children's Hospital and Texas Children's Hospital West Campus and Dr. Mona Karimullah, M.D be cited to appear and show cause and that on such hearing, a Temporary Injunction be issued, to Defendant, their physicians, contractors, subcontractors, agents, servants, employees, experts and/or those

⁷ The AAN's definition for "disorders of consciousness" is 28 days or greater; <https://n.neurology.org/content/91/10/450>.

acting in concert with them from refusing to provide life-sustaining treatment to Plaintiff, to keep the status quo while this Court resolves this dispute.

Plaintiff ANNELOSE CAMP, and next of kin, JOY AND JOHNSTON CAMP, on her behalf, prays that Defendant Texas Children's Hospital, be cited to appear and answer herein and, upon hearing thereof, Plaintiff be granted a Temporary Restraining Order and a Temporary Injunction and such other and further relief, to which Plaintiff may be shown to be entitled.

Respectfully submitted,

By: /s/ Sarah B. Beck

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Kasia Olkowski on behalf of Sarah Beck

Bar No. 24148754

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Status as of 5/28/2026 10:05 PM CST

Case Contacts

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