

# COMMONWEALTH OF VIRGINIA



HALIFAX CIRCUIT COURT  
Civil Division  
8 SOUTH MAIN STREET  
HALIFAX VA 24558  
(434) 476-6211

## Summons

To: SOUTHSTONE BEHAVIORAL HEALTH  
3046 CARLBROOK ROAD  
SOUTH BOSTON VA 24592

Case No. 083CL24000490-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Wednesday, July 10, 2024

Clerk of Court: CATHY M COSBY

by Danielle N Younger  
(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name:

# COMMONWEALTH OF VIRGINIA



HALIFAX CIRCUIT COURT  
Civil Division  
8 SOUTH MAIN STREET  
HALIFAX VA 24558  
(434) 476-6211

Proof of Service

Virginia:

In the HALIFAX CIRCUIT COURT

Case number: 083CL24000490-00

Service number: 001

Service filed: June 14, 2024

Judge: JWW

*Dmy*

Served by: HALIFAX COUNTY

Style of case: JOSHUA CALEB SHIVER vs ACADIA HEALTHCARE LLC

Service on: SOUTHSTONE BEHAVIORAL HEALTH

Attorney:

3046 CARLBROOK ROAD  
SOUTH BOSTON VA 24592

Instructions:

Returns shall be made hereon, showing service of Summons issued Wednesday, July 10, 2024 with a copy of the Complaint filed Friday, June 14, 2024 attached.

Hearing date :

Service issued: Wednesday, July 10, 2024

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For Sheriff Use Only

1 Joshua Shiver  
2 205 34<sup>th</sup> Street Apt 306  
3 Virginia Beach, Virginia 23542  
4 757-803-6758  
5 Joshuashiver207@gmail.com

CASE #

CL24000490-00

IN THE CIRCUIT COURT FOR HALIFAX COUNTY, VIRGINIA

COMMONWEALTH OF VIRGINIA

7 JOSHUA CALEB SHIVER,

8 Plaintiff,

9 v.

10 ACADIA HEALTHCARE LLC

11 SOUTHSTONE BEHAVIORAL HEALTH,

12 Defendants

Case No.: TBD

CIVIL COMPLAINT

13 CIVIL COMPLAINT

14  
15 COMES NOW Plaintiff Joshua Shiver, through Pro Se, and files this, his complaint  
16 against the

17 Defendants Acadia Healthcare LLC and Southstone Behavioral Health to-wit:

- 18 1. Plaintiff was receiving services in Halifax County, Virginia from August 2020  
19 until September 2020  
20  
21 2. Defendant, Acadia Healthcare LLC owned and operated Southstone Behavioral  
22 Health through its physicians, staff, agents, servants, employees and representatives,  
23 who may be served with the process of this court by serving its Administrator.  
24  
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1 Defendant Acadia Healthcare LLC, is an organization based in Franklin, Tennessee who  
2 may be served with the process of this Court at 6100 Tower Circle, Suite 1000. Franklin,  
3 TN 37067  
4

5 Defendants Acadia Healthcare LLC is liable and responsible for all the actions, omissions  
6 and negligence of its agents, servants, representatives and employees. Defendant  
7 Southstone Behavioral Health was a children's residential psychiatric facility catering to  
8 children and adolescents offering trauma-based care for children who suffer from  
9 cognitive, mental, and social disorders.  
10

11  
12 3. That on or about the dates of August 8<sup>th</sup>, 2020 thru September 4<sup>th</sup>, 2020, Plaintiff  
13 Sought treatment for Suicidal Ideation, Homicidal Ideation, Bipolar Disorder, and  
14 Autism Spectrum Disorder. During these dates, Plaintiff was exposed to unnecessary  
15 physical restraint, practices, sexual abuse that failed to provide a reasonably safe and  
16 therapeutic environment for the Plaintiff. Defendants violated the acceptable standard  
17 of care which was the proximate cause of Plaintiff's Injuries.  
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20 4. That at all times mentioned herein, the physicians, nurses, aides, technicians,  
21 counselors, and others assisting were the agents, servants, and employees acting  
22 within the scope of their employment of the Defendant. That through their obvious,  
23 negligence and unnecessary practices, proximately caused and contributed to  
24 Plaintiffs mental health becoming more serious, severe and sustaining damages. As a  
25 result of the negligence of the employees/agents of Defendant, Southstone Behavioral  
26 Health and Acadia Healthcare LLC.  
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1  
2 5. Plaintiff would further assert that Defendants failed to provide a safe and  
3 therapeutic environment to treat plaintiff's mental health.  
4

5 6. Plaintiff would state unto the Court that the Defendants grossly and negligently  
6 failed to properly observe, treat, and/or administer proper mental health care to  
7 Plaintiff.  
8

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11 7. Plaintiff would further show that the Defendants are liable and responsible on the  
12 basis of Medical Malpractice.  
13

14 8. Plaintiff would show unto the Court that as a direct and proximate result of the  
15 negligent actions of Defendants, Plaintiff was caused to endure physical abuse,  
16 unnecessarily physical restraint, mental anguish, and be in a unsafe environment.  
17

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20 9. That as a direct and proximate consequence of the Defendant's actions, inactions  
21 and negligence, Plaintiff alleges that the following damages are recoverable of, from  
22 and against the Defendant's as follows, to-wit:

23 A. Pain and suffering;

24 B. Mental and Emotional Distress

25 C. All expenses incurred as a result of the Defendant's negligence  
26  
27  
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1 WHEREFORE, PREMISES CONSIDERED, Plaintiff, Joshua Caleb Shiver, brings this  
2 action against the Defendants, Acadia Healthcare LLC and Southstone Behavioral Health, jointly and  
3 severally, and demands judgment of, from and against the Defendants in an amount in excess of  
4 \$2,500,000, together with all costs herein.  
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9 Dated this 3<sup>rd</sup> Day of June, 2024.

10  
11   
12 Joshua C. Shiver  
13

14 PLAINTIFF DEMANDS A TRIAL BY JURY  
15  
16  
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25 FILED IN THE CIRCUIT COURT  
26 HALIFAX COUNTY, VA  
27 DATE: June 14, 2024  
28

CLERK

DEPUTY CLERK

## IN THE CIRCUIT COURT OF HALIFAX COUNTY

## VIRGINIA

JOSHUA CALEB SHIVER,

Plaintiff,

vs.

ACADIA HEALTHCARE LLC

SOUTHSTONE BEHAVIORAL HEALTH,

Defendant

Case No.: CL24000490-00

**CERTIFICATE OF SERVICE****CERTIFICATE OF SERVICE**

I certify that I mailed a copy of this Civil Complaint to Acadia Healthcare LLC thru Certified Mail

On this 18<sup>th</sup> Day of June, 2024Dated this 18<sup>th</sup> Day of June, 2024.  
Joshua C. ShiverFILED IN THE CIRCUIT COURT  
HALIFAX COUNTY, VA

DATE: June 17, 2024

CERTIFICATE OF SERVICE - 1

~~CLERK~~  
DEPUTY CLERK

## IN THE CIRCUIT COURT OF HALIFAX COUNTY

## VIRGINIA

JOSHUA CALEB SHIVER,

Plaintiff,

vs.

ACADIA HEALTHCARE LLC

SOUTHSTONE BEHAVIORAL HEALTH,

Defendant

Case No.: CL24000490-00

**CERTIFICATE OF SERVICE****CERTIFICATE OF SERVICE**

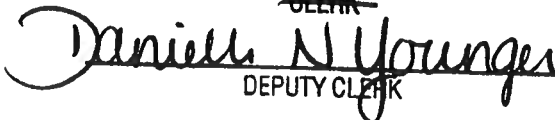
I certify that I mailed a copy of this Civil Complaint Southstone Behavioral Health thru Certified Mail On this 18<sup>th</sup> Day of June, 2024

Dated this 18<sup>th</sup> Day of June, 2024.

  
Joshua C. ShiverFILED IN THE CIRCUIT COURT  
HALIFAX COUNTY, VA

DATE: June 17, 2024

CERTIFICATE OF SERVICE - 1

~~CLERK~~  
DEPUTY CLERK