

TERRELL PRINCETON BROWN, SR., : IN THE
 Personal Representative of the Estate of :
 LAKEEKEE ITASHIAH KING, Deceased : CIRCUIT COURT
 3516 Courtleigh Drive :
 Randallstown, Maryland 21144 : FOR

and : BALTIMORE CITY

TERRELL PRINCETON BROWN, SR. : Case No.: 24.C-18-003411
 3516 Courtleigh Drive :
 Randallstown, Maryland 21144 :

and :

TERRELL PRINCETON BROWN, SR., :
 Parent and Next Friend of TERRELL :
 PRINCETON BROWN, JR., Minor :
 3516 Courtleigh Drive :
 Randallstown, Maryland 21144 :

Plaintiffs :

v. :

KAREN Y. PERKINS, M.D. :
 5310 Old Court Road, Suite 305 :
 Randallstown, Maryland 21133 :

and :

CARLA J. WEISMAN, M.D. :
 2434 West Belvedere Avenue, Suite 33 :
 Baltimore, Maryland 21215 :

and :

A WOMAN'S CHOICE OB/GYN, L.L.C. :
 408 Summer Woods Way :
 Owings Mills, Maryland 21117 :

Serve on Resident Agent:
 Karen Perkins-Holmes :
 408 Summer Woods Way :
 Owings Mills, Maryland 21117 :

Case: 24-cv-18-003411
 CV File No
 RIF-New Case \$00.00
 Appeal Fee \$00.00
 MLSC \$00.00
 TOTAL \$00.00

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 Cashier: RJA CASHIER

and :

SINAI HOSPITAL OF BALTIMORE, INC. :

2401 West Belvedere Avenue :

Baltimore, Maryland 21215 :

Serve on Resident Agent: :

Joel I. Suldan :

2401 West Belvedere Avenue :

Baltimore, Maryland 21215 :

Defendants :

: : : : : : : : : :

18 FEB 25 PM 2:23
CIVIL DIVISION

COMPLAINT

COUNT I

COMES NOW the Plaintiff, Terrell Princeton Brown, Sr., Personal Representative of the Estate of the Late Lakeekee Itashiah King, Deceased, by her attorneys, Jonathan Schochor, Scott P. Kurlander, and Schochor, Federico and Staton, P.A. and sues, Karen Y. Perkins, M.D., Carla J. Weisman, M.D., A Women’s Choice OB/GYN, L.L.C., and Sinai Hospital of Baltimore, Inc., Defendants:

1. At all times of which the Plaintiff complains, the Defendants, Karen Y. Perkins, M.D. (hereinafter referred to as “Perkins”), and Carla J. Weisman, M.D. (hereinafter referred to as “Weisman”) represented to the Plaintiff’s Decedent and the public that he possessed the degree of skill, knowledge and ability possessed by reasonably competent medical practitioners, practicing under the same or similar circumstances as those involving the Plaintiff’s Decedent.

2. The Plaintiff alleges that the Defendants Perkins and Weisman herein, including duly authorized agents and/or employees of the Defendant Limited Liability Corporation and/or Hospital, owed to the Plaintiff’s Decedent the duty to exercise the degree of care, skill and judgment expected of a competent medical practitioner acting in the same or similar

circumstances, which duty included the performance of adequate and proper diagnostic tests and procedures to determine the nature and severity of the Plaintiff's Decedent's condition, careful diagnosis of such condition, employment of appropriate procedures, surgery and/or treatment to correct such conditions without injury upon the Plaintiff's Decedent, continuous evaluation of the Plaintiff's Decedent's condition and the effects of such treatment, and adjustment of the course of treatment in response to such ongoing surveillance and evaluation -- all of which the Defendants failed to do.

3. The Defendants Perkins and Weisman were negligent in that they failed to employ appropriate treatment, surgery, tests and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff's Decedent's condition, failed to properly and appropriately diagnose the Plaintiff's Decedent's condition, failed to thoroughly evaluate the effects and results of any tests and/or procedures performed, failed to properly evaluate the effects of chosen treatment, failed to adjust the Plaintiff's Decedent's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff's Decedent's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Plaintiff's Decedent's condition, and were otherwise negligent.

4. The Plaintiff alleges that the Defendant A Woman's Choice OB/GYN, L.L.C., through its agents, servants and employees, owed to the Plaintiff's Decedent a duty to exercise a degree of care, skill and judgment expected of a competent medical corporation acting in the same or similar circumstances, which duty included the performance of adequate and proper diagnostic tests and procedures to determine the nature and severity of the Plaintiff's Decedent's condition, careful diagnosis of such condition, employment of appropriate procedures, tests, surgery and/or treatment to correct such conditions without inflicting injury upon the Plaintiff's Decedent,

continuous evaluation of the Plaintiff's Decedent's condition and effects of such treatment, and the adjustment of the course of treatment in response to ongoing surveillance and evaluation -- all of which the Defendant failed to do.

5. The Defendant A Woman's Choice OB/GYN, L.L.C., through its agents, servants and/or employees, was negligent in that it failed to employ appropriate treatment, surgery and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff's Decedent's condition, failed to thoroughly evaluate the effects and results of any tests, treatment and/or procedures performed, failed to adjust the Plaintiff's Decedent's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff's Decedent's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Plaintiff's Decedent's condition, failed to diagnose the Plaintiff's Decedent's condition and was otherwise negligent.

6. The Plaintiff alleges that the Defendant Sinai Hospital of Baltimore, Inc. (hereinafter referred to as "Hospital"), through its agents, servants and employees, owed to the Plaintiff's Decedent a duty to exercise a degree of care, skill and judgment expected of a competent medical corporation acting in the same or similar circumstances, which duty included the performance of adequate and proper diagnostic tests and procedures to determine the nature and severity of the Plaintiff's Decedent's condition, careful diagnosis of such condition, employment of appropriate procedures, tests, surgery and/or treatment to correct such conditions without inflicting injury upon the Plaintiff's Decedent, continuous evaluation of the Plaintiff's Decedent's condition and effects of such treatment, and the adjustment of the course of treatment in response to ongoing surveillance and evaluation -- all of which the Defendant failed to do.

7. The Defendant Hospital, through its agents, servants and/or employees, was negligent in that it failed to employ appropriate treatment, surgery and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff's Decedent's condition, failed to thoroughly evaluate the effects and results of any tests, treatment and/or procedures performed, failed to adjust the Plaintiff's Decedent's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff's Decedent's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Plaintiff's Decedent's condition, failed to diagnose the Plaintiff's Decedent's condition and was otherwise negligent.

8. At all times referred to herein, the Defendants Perkins and Weisman acted for themselves and as duly authorized agents and/or employees of the Defendants A Woman's Choice OB/GYN, L.L.C and/or the Defendant Hospital, acting within the scope of their respective authority.

9. As a direct and proximate result of the negligence of these Defendants and each of them, the Plaintiff's Decedent suffered unending physical pain, emotional anguish as well as severe disability and a tragic and untimely demise on September 19, 2017 as is more fully described, hereinbelow.

10. At all times referred to herein, the Plaintiff's Decedent was under the care of the Defendants Perkins, Weisman, A Women's Choice OB/GYN, L.L.C., as well as personnel at the Defendant Hospital.

11. On March 31, 2017, the Plaintiff's Decedent, Lakeekee Itashiah King, age 24, was seen at her obstetrician's office because of a positive urine pregnancy test. Throughout the course

of her pregnancy, she was under the care of the Defendant Perkins, who at all times referred to herein, held herself out to be an expert in obstetrics.

12. Specifically, on June 23, 2017, the Plaintiff's Decedent was seen at the Defendant obstetrician's office when she was 18 and 3/7 weeks through her gestational period. At that time, her urine showed 250 glucose. A one-hour glucose test was not scheduled to follow up on the presence of glucose in the urine. It is alleged that these Defendants should have scheduled one-hour glucose to be performed between 20 and 22 weeks gestation, based on this finding. They failed to do so in continuing violation of the standards of care.

13. On August 8, 2017, the Plaintiff's Decedent was returned to the Defendant obstetrician's office when she was 25 and 2/7 weeks through her gestational period. At that time, her urine again tested positive for glucose, as well as albumin. At that time, the Plaintiff's Decedent was not provided a one-hour glucose test because she had already eaten that day. However, it is alleged that these Defendants should have performed the one-hour glucose test in any event, since fasting was not required. Therefore, the failure to do the glucose testing constituted an ongoing violation of the standards of care. Had the test been completed in a timely fashion as required, an obvious diagnosis of gestational diabetes would have been made with the Plaintiff's Decedent being treated accordingly. However, since no diagnosis was made in continuing violation of the standards of care, no treatment was provided.

14. On August 25 2017, when the Plaintiff's Decedent was 27 weeks through her gestation, she experienced a rupture of her membranes at home. The baby then delivered head first approximately 10-minutes later. The baby and mother were taken by separate ambulances to the Defendant Hospital for further treatment. Vital signs taken by EMS personnel regarding the Plaintiff's Decedent included a finger stick glucose of 503 -- a panic value for hyperglycemia.

15. After arrival at the Defendant Hospital, a urinalysis was completed which showed protein 100 (++) , a pH 6.5, a large amount of ketones, and 2,000 or more glucose. Additionally, testing indicated that the Plaintiff's Decedent was Methicillin-Resistant Staphylococcus Aureus (MRSA) positive. Lesions were visualized on her legs bilaterally, as well as in the area of her groin -- again indicative of infection due to a MRSA infection. Her white blood cell count on admission was severely elevated at 23.15, as well, confirming infection.

16. Amazingly, the Plaintiff's Decedent was not diagnosed appropriately and/or treated appropriately. She was simply discharged on August 27, 2017, with instructions to follow-up with her obstetrician in one week. When discharged, the Plaintiff's Decedent was simply on oral medications, including Bactrim and Valtrex -- totally insufficient to treat the MRSA infection from which she suffered. There was no treatment whatsoever for her obvious gestational diabetes, which was at a critical level.

17. On September 19, 2017, the Plaintiff's Decedent was found unresponsive in her home. Resuscitation efforts were unsuccessful with autopsy results indicating the cause of death to be diabetic ketoacidosis with the MRSA infection as a contributing factor. As indicated hereinabove, these Defendants and each of them continually failed to make an appropriate diagnosis and render appropriate treatment to the Plaintiff's Decedent which resulted in her tragic and untimely demise.

18. As indicated hereinabove, the Defendants Perkins and Weisman breached the standards of care in failing to perform the one-hour glucose test on the Plaintiff's Decedent between 20 and 22 weeks gestation -- and continuously thereafter. Additionally, the glucose test never should have been deferred because she had eaten. As indicated, the one-hour glucose test is not a fasting test in any event and should have been performed. Had the standards of care been

met, the diagnosis of gestational diabetes would have been made with appropriate intervention and treatment -- none of which ever occurred, in continuing violation of the standards of care.

19. Additionally, it is alleged that when the Plaintiff's Decedent was admitted to the Defendant Hospital after the delivery of her son, the Defendants herein, as well as any and all hospital personnel caring for the Plaintiff's Decedent, negligently failed to diagnose and treat her gestational diabetes as well as the MRSA infection. Notwithstanding a fingerstick from EMS which revealed a glucose level of 503 when she had arrived at the Defendant Hospital, in addition to a 2,000 or more glucose level in her urine culture, these Defendants did nothing to diagnose and/or treat her condition in continuing violation of the standards of care.

20. Additionally, as indicated, the Plaintiff's Decedent's white blood cell count was elevated on admission. These Defendants also knew that she was MRSA positive from a wound culture. These Defendants and each of them continued to violate the standards of care by failing to treat the MRSA infection, which required more aggressive therapy than simple oral Bactrim -- which was ineffective to treat the infection. It is alleged that the standards of care required these Defendants to obtain repeat white blood cell counts with a differential, and to begin the Plaintiff's Decedent on intravenous antibiotics, in addition to arranging an infectious disease consultation. Tragically, no additional laboratory studies were drawn, and the Plaintiff's Decedent was simply discharged on an inadequate regimen of oral Bactrim. In addition to the Decedent's diabetes, the improperly treated infection, and infection remained undiagnosed and untreated, the Plaintiff's Decedent predictably spiraled downward and died thereafter. Had the diagnoses been made in a timely fashion, and appropriately treated, it is alleged that the Plaintiff's Decedent would have made an uneventful recovery to resume all of her normal activities. However, as the direct and

proximate result of the ongoing negligence of these Defendants and each of them, the Plaintiff's Decedent died on September 19, 2017.

21. It is alleged that the Plaintiff's Decedent suffered unending physical pain, emotional anguish as well as fear and anxiety prior to her demise. Additionally, it is alleged that the Plaintiff's Decedent incurred hospital, surgical, pharmaceutical, funeral, burial, and other losses and expenses for which claim is made.

22. The Plaintiff and Plaintiff's Decedent refer to the negligence of these Defendants and each of them as the sole and proximate cause of all of the injuries, damages and death of the Plaintiff's Decedent -- with the Plaintiff and Plaintiff's Decedent being in no way contributorily negligent.

23. The negligence complained of occurred in Baltimore City. Venue is claimed in Baltimore City. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).



Jonathan Schochor #7406010179



Scott P. Kurlander #9412140137

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Schochor, Federico and Staton, P.A.

The Paulton

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skurlander@sfspa.com

Attorneys for the Plaintiffs

COUNT II

COMES NOW the Plaintiff, Terrell Princeton Brown, Sr., by his attorneys, Jonathan Schochor, Scott P. Kurlander, and Schochor, Federico and Staton, P.A. and sues, Karen Y. Perkins, M.D., Carla J. Weisman, M.D., A Women's Choice OB/GYN, L.L.C., and Sinai Hospital of Baltimore, Inc., Defendants:

1. The Plaintiff incorporates in this Count those facts set forth in Count I hereinabove by reference thereto intending that each and every allegation hereinabove be deemed part hereof as if the same were repeated herein.

2. The Plaintiff alleges that he is the surviving husband of the Plaintiff's Decedent, Lakeekee Itashiah King. As a result of the negligence of these Defendants, the Plaintiff asserts that the marriage and marital relationship he enjoyed with the Plaintiff's Decedent was destroyed.

3. The Plaintiff alleges that he has lost the love, support, guidance, advice and comfort furnished by his beloved wife as the result of the negligence of these Defendants. The death of his wife represents a tragedy from which he will never recover.

4. The negligence complained of occurred in Baltimore City. Venue is claimed in Baltimore City. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).



Jonathan Schochor #7406010179



Scott P. Kurlander #9412140137

Schochor, Federico & Staton, PA

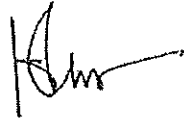
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Attorneys for the Plaintiffs

COUNT III

COMES NOW the Plaintiff, Terrell Princeton Brown, Sr., Parent and Next Friend of Terrell Princeton Brown, Jr., Minor, by his attorneys, Jonathan Schochor, Scott P. Kurlander, and Schochor, Federico and Staton, P.A. and sues, Karen Y. Perkins, M.D., Carla J. Weisman, M.D., A Women's Choice OB/GYN, L.L.C., and Sinai Hospital of Baltimore, Inc., Defendants:

1. The Plaintiff incorporates in this Count those facts set forth in Counts I and II hereinabove by reference thereto intending that each and every allegation hereinabove be deemed part hereof as if the same were repeated herein.
2. The Plaintiff alleges that Terrell Princeton Brown, Jr. is the surviving minor son of the Plaintiff's Decedent, Lakeekee Itashiah King. As a result of the negligence of these Defendants, the Plaintiff asserts that the relationship he enjoyed with the Plaintiff's Decedent was destroyed.
3. The Plaintiff alleges that the minor son has lost the love, support, guidance, advice and comfort furnished by his beloved mother as the result of the negligence of these Defendants. The death of his mother represents a tragedy from which he will never recover.
4. The negligence complained of occurred in Baltimore City. Venue is claimed in Baltimore City. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).



Jonathan Schochor #7406010179



Scott P. Kurlander #9412140137

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Attorneys for the Plaintiffs


COUNT IV

COMES NOW the Plaintiff, Terrell Princeton Brown, Sr., by his attorneys, Jonathan Schochor, Scott P. Kurlander, and Schochor, Federico and Staton, P.A. and sues, Karen Y. Perkins, M.D., Carla J. Weisman, M.D., A Women's Choice OB/GYN, L.L.C., and Sinai Hospital of Baltimore, Inc., Defendants:

1. The Plaintiff incorporates in this Count those facts set forth in Counts I, II, and III hereinabove by reference thereto intending that each and every allegation hereinabove be deemed part hereof as if the same were repeated herein.

2. As the direct and proximate result of the negligence of these Defendants, the Plaintiff incurred hospital, surgical, pharmaceutical, funeral, burial and other losses and expenses for which claim is made.

3. The negligence complained of occurred in Baltimore City. Venue is claimed in Baltimore City. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).



Jonathan Schochor #7406010179



Scott P. Kurlander #9412140137

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Attorneys for the Plaintiffs

TERRELL PRINCETON BROWN, SR.,
Personal Representative of the Estate of
LAKEEKEE ITASHIAH KING, Deceased,
et al

Plaintiffs

v.

KAREN Y. PERKINS, M.D., et al

Defendants

IN THE

CIRCUIT COURT

FOR

BALTIMORE CITY

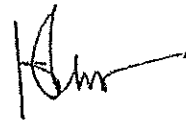
Case No.:

19 MAY 25 PM 2:29
CIVIL DIVISION

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ELECTION FOR JURY TRIAL

The Plaintiffs in this case elect to try their case before a Jury.



Jonathan Schochor #7406010179



Scott P. Kurlander #9412140137

Schochor, Federico & Staton, PA

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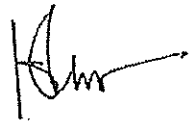
Attorneys for the Plaintiffs

TERRELL PRINCETON BROWN, SR., : IN THE
 Personal Representative of the Estate of :
 LAKEEKEE ITASHIAH KING, Deceased, : CIRCUIT COURT
 et al :
 Plaintiffs : FOR
 v. : BALTIMORE CITY
 KAREN Y. PERKINS, M.D., et al : Case No.:
 Defendants :
 : : : : : : : : : : : :

18 MAY 25 PM 2:29
 CIVIL DIVISION

CERTIFICATE OF DISCOVERY

I HEREBY CERTIFY that Interrogatories, Request for Production of Documents, and Notice to Take Deposition will be served along with the Complaint, and that I will retain the original of this document in my possession, without alteration, until the case is concluded in this Court, the time for noting an appeal has expired, and any appeal noted has been decided.



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Attorneys for the Claimants

TERRELL P. BROWN, SR., *et al*

*

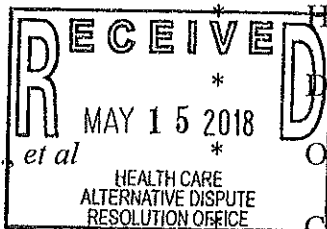
BEFORE THE

Claimants

v.

KAREN Y. PERKINS, M.D., *et al*

Defendants



HEALTH CARE ALTERNATIVE

DISPUTE RESOLUTION

OFFICE OF MARYLAND

Case No.:

* * * * *

CLAIMANTS' CERTIFICATE OF MERIT

I HEREBY CERTIFY and acknowledge that I have reviewed the hospital records, medical records, and other documentation pertaining to the facts and circumstances in the above captioned case.

I hereby certify and acknowledge there were breaches in the standards of care by Karen Y. Perkins, M.D., Carla J. Weisman, M.D. and duly authorized agents, servants and/or employees of A Woman's Choice Ob/Gyn, LLC and Sinai Hospital of Baltimore, Inc. which have directly and proximately resulted in injuries, damages and death to the Claimants' Decedent.

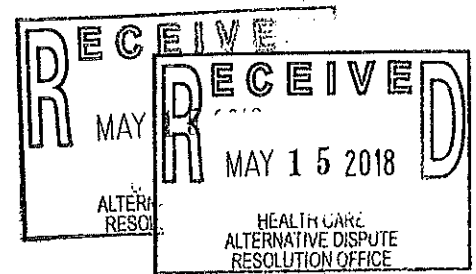
I certify that I am a board-certified expert in obstetrics and gynecology. I further certify that I have had clinical experience, provided consultation relating to clinical practice and/or taught medicine in the Defendants' specialty or a related field of health-care, or in the field of health care in which the Defendants provided care or treatment to the Claimants' Decedent, within five (5) years of the date of the alleged act or omission giving rise to the cause of action.

I acknowledge that less than 20% of my annual professional time directly involves testimony in personal injury claims. My report in the above-referenced case is attached hereto.

 A handwritten signature in black ink, appearing to read "Richard Luciani", written over a horizontal line.

Richard Luciani, M.D.

Jonathan Schochor, Esquire
Schochor, Federico, and Staton, P.A.
1211 St. Paul Street
Baltimore, Maryland 21202



Re: Lakeekee King, Deceased

Dear Mr. Schochor:

This is to acknowledge that after a review of the medical records, hospital records and other materials involved in the above-referenced case, I have concluded that there were breaches and/or violations in the accepted standards of care by Karen Y. Perkins, M.D., Carla J. Weisman, M.D. and duly authorized agents, servants and/or employees of A Woman's Choice Ob/Gyn, LLC and Sinai Hospital of Baltimore, Inc. which have directly and proximately resulted in injuries, damages and death to the Claimants' Decedent.

It is my opinion that the Defendant Perkins, acting for herself and as a duly authorized agent, servant and/or employee of Defendant A Woman's Choice Ob/Gyn, LLC breached the standards of care in failing to timely obtain a one-hour glucose test no later than twenty-two weeks gestation. Because the Claimants' Decedent had glucose present in her urine as early as eighteen weeks gestation, the one-hour glucose test was required to be performed sooner. Had the standard of care been met, the Claimants' Decedent would have been diagnosed with gestational diabetes and provided the necessary insulin and diabetic management. As a result of the Defendant's negligence, the Claimants' Decedent went on to develop diabetic ketoacidosis and succumbing to the same.

It is also my opinion that the Defendants Perkins and Weisman, acting for themselves and as duly authorized agents, servants and/or employees of Defendant Sinai Hospital of Baltimore, Inc. breached the standards of care on a continuing basis following the Claimants' Decedent's admission to Defendant hospital on August 25, 2017, in failing to diagnose and treat gestational diabetes as well as a systemic MRSA infection. With a finger stick blood sugar of 503, over 2000 count glucose in the urine and a white blood cell count of over 23,000, the Claimants' Decedent had diagnostic proof of gestational diabetes and a *systemic* antibiotic-resistant infection which the defendants failed to diagnose and treat. Had the standards of care been met, Defendants Perkins, Weisman and agents, servants and/or employees of Sinai Hospital of Baltimore, Inc. would have admitted Claimants' Decedent for diabetic management to include but not be limited to sliding scale insulin, insulin drip and continuous monitoring of blood glucose until levels stabilized. Had the standards of care been met by each of them, Claimants' Decedents white blood cell count would have been repeatedly checked with differentials, would have been administered intravenous antibiotics, and would have been provided an infectious disease consultation.

As a result of the negligence of the Defendants, the Claimants' Decedent was discharged from the Defendant hospital without the proper diagnosis or treatment of gestational diabetes and a systemic MRSA infection, which was allowed to progress and worsen. This continuous and ongoing delay in diagnosis and treatment caused the Claimants' Decedent to develop diabetic ketoacidosis and worsening infection, resulting in death.

I certify that I am a board-certified expert in obstetrics and gynecology. I further certify that I have had clinical experience, provided consultation relating to clinical practice and/or taught medicine in the Defendants' specialty or a related field of health-care, or in the field of health care in which the Defendants provided care or treatment to the Claimants' Decedent, within five (5) years of the date of the alleged act or omission giving rise to the cause of action.

Accordingly, I have concluded that the case filed before the Health Care Alternative Dispute Resolution Office of Maryland is meritorious. I also acknowledge that less than 20% of my annual professional time directly involves testimony in personal injury claims.

This report represents a broad summary of my opinions for purposes of certifying the merit of this matter. I specifically reserve the right to modify, amend and/or supplement my opinions as further information about this case is made available to me through the discovery process.



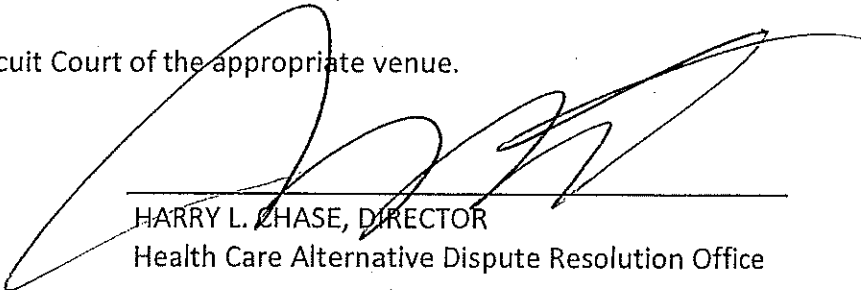
Richard Luciani, M.D.

TERRELL PRINCETON BROWN, SR.,	*	BEFORE THE
Personal Representative of the Estate of	*	
LAKEEKEE ITASHIAH KING, Deceased, et al.	*	HEALTH CARE
	*	
Claimants	*	ALTERNATIVE DISPUTE
	*	
v.	*	RESOLUTION OFFICE
	*	
KAREN Y. PERKINS, M.D., et al.	*	
	*	
Health Care Providers	*	HCA No.: 2018-247
	*	

ORDER OF TRANSFER

The Claimants, by and through counsel, having elected a Waiver of Arbitration under the provisions of Annotated Code of Maryland, Courts and Judicial Proceedings, Article, § 3-2A-06B, it is this 7th day of May, 2018, by the Health Care Alternative Dispute Resolution Office,


ORDERED, that this case shall be and is hereby, transferred to the United States District Court, or to the Circuit Court of the appropriate venue.



 HARRY L. CHASE, DIRECTOR
 Health Care Alternative Dispute Resolution Office

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the above ORDER OF TRANSFER have been mailed, postage prepaid, to all counsel.



 HARRY L. CHASE, DIRECTOR

(City or County)

CIVIL - NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: PLAINTIFF DEFENDANT CASE NUMBER _____ (Clerk to insert)

CASE NAME: Brown vs. Perkins, et al
Plaintiff Defendant

PARTY'S NAME: Terrell Princeton Brown, Sr. PHONE: _____

PARTY'S ADDRESS: 3516 Courtleigh Drive, Randallstown, MD 21144

PARTY'S E-MAIL: _____

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Jonathan Schochor PHONE: 410-234-1000

PARTY'S ATTORNEY'S ADDRESS: 1211 St. Paul Street, Baltimore, MD 21202

PARTY'S ATTORNEY'S E-MAIL: jschochor@sfspace.com

JURY DEMAND? Yes No

RELATED CASE PENDING? Yes No If yes, Case #(s), if known: _____

ANTICIPATED LENGTH OF TRIAL?: _____ hours _____ days

PLEADING TYPE

New Case: Original Administrative Appeal Appeal

Existing Case: Post-Judgment Amendment

If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

- | | | | |
|--|---|---|--|
| TORTS | <input type="checkbox"/> Government | PUBLIC LAW | <input type="checkbox"/> Constructive Trust |
| <input type="checkbox"/> Asbestos | <input type="checkbox"/> Insurance | <input type="checkbox"/> Attorney Grievance | <input type="checkbox"/> Contempt |
| <input type="checkbox"/> Assault and Battery | <input type="checkbox"/> Product Liability | <input type="checkbox"/> Bond Forfeiture Remission | <input type="checkbox"/> Deposition Notice |
| <input type="checkbox"/> Business and Commercial | PROPERTY | <input type="checkbox"/> Civil Rights | <input type="checkbox"/> Dist Ct Mtn Appeal |
| <input type="checkbox"/> Conspiracy | <input type="checkbox"/> Adverse Possession | <input type="checkbox"/> County/Mncpl Code/Ord | <input type="checkbox"/> Financial |
| <input type="checkbox"/> Conversion | <input type="checkbox"/> Breach of Lease | <input type="checkbox"/> Election Law | <input type="checkbox"/> Grand Jury/Petit Jury |
| <input type="checkbox"/> Defamation | <input type="checkbox"/> Detinue | <input type="checkbox"/> Eminent Domain/Condemn. | <input type="checkbox"/> Miscellaneous |
| <input type="checkbox"/> False Arrest/Imprisonment | <input type="checkbox"/> Distress/Distrain | <input type="checkbox"/> Environment | <input type="checkbox"/> Perpetuate Testimony/Evidence |
| <input type="checkbox"/> Fraud | <input type="checkbox"/> Ejectment | <input type="checkbox"/> Error Coram Nobis | <input type="checkbox"/> Prod. of Documents Req. |
| <input type="checkbox"/> Lead Paint - DOB of Youngest Plt: _____ | <input type="checkbox"/> Forcible Entry/Detainer | <input type="checkbox"/> Habeas Corpus | <input type="checkbox"/> Receivership |
| <input type="checkbox"/> Loss of Consortium | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Mandamus | <input type="checkbox"/> Sentence Transfer |
| <input type="checkbox"/> Malicious Prosecution | <input type="checkbox"/> Commercial | <input type="checkbox"/> Prisoner Rights | <input type="checkbox"/> Set Aside Deed |
| <input checked="" type="checkbox"/> Malpractice-Medical | <input type="checkbox"/> Residential | <input type="checkbox"/> Public Info. Act Records | <input type="checkbox"/> Special Adm. - Atty |
| <input type="checkbox"/> Malpractice-Professional | <input type="checkbox"/> Currency or Vehicle | <input type="checkbox"/> Quarantine/Isolation | <input type="checkbox"/> Subpoena Issue/Quash |
| <input type="checkbox"/> Misrepresentation | <input type="checkbox"/> Deed of Trust | <input type="checkbox"/> Writ of Certiorari | <input type="checkbox"/> Trust Established |
| <input type="checkbox"/> Motor Tort | <input type="checkbox"/> Land Installments | EMPLOYMENT | <input type="checkbox"/> Trustee Substitution/Removal |
| <input type="checkbox"/> Negligence | <input type="checkbox"/> Lien | <input type="checkbox"/> ADA | <input type="checkbox"/> Witness Appearance-Compel |
| <input type="checkbox"/> Nuisance | <input type="checkbox"/> Mortgage | <input type="checkbox"/> Conspiracy | PEACE ORDER |
| <input type="checkbox"/> Premises Liability | <input type="checkbox"/> Right of Redemption | <input type="checkbox"/> BEO/HR | <input type="checkbox"/> Peace Order |
| <input type="checkbox"/> Product Liability | <input type="checkbox"/> Statement Condo | <input type="checkbox"/> FLSA | EQUITY |
| <input type="checkbox"/> Specific Performance | <input type="checkbox"/> Forfeiture of Property / Personal Item | <input type="checkbox"/> FMLA | <input type="checkbox"/> Declaratory Judgment |
| <input type="checkbox"/> Toxic Tort | <input type="checkbox"/> Fraudulent Conveyance | <input type="checkbox"/> Workers' Compensation | <input type="checkbox"/> Equitable Relief |
| <input type="checkbox"/> Trespass | <input type="checkbox"/> Landlord-Tenant | <input type="checkbox"/> Wrongful Termination | <input type="checkbox"/> Injunctive Relief |
| <input type="checkbox"/> Wrongful Death | <input type="checkbox"/> Lis Pendens | INDEPENDENT PROCEEDINGS | <input type="checkbox"/> Mandamus |
| CONTRACT | <input type="checkbox"/> Mechanic's Lien | <input type="checkbox"/> Assumption of Jurisdiction | <input type="checkbox"/> Accounting |
| <input type="checkbox"/> Asbestos | <input type="checkbox"/> Ownership | <input type="checkbox"/> Authorized Sale | <input type="checkbox"/> Friendly Suit |
| <input type="checkbox"/> Breach | <input type="checkbox"/> Partition/Sale in Lieu | <input type="checkbox"/> Attorney Appointment | <input type="checkbox"/> Grantor in Possession |
| <input type="checkbox"/> Business and Commercial | <input type="checkbox"/> Quiet Title | <input type="checkbox"/> Body Attachment Issuance | <input type="checkbox"/> Maryland Insurance Administration |
| <input type="checkbox"/> Confessed Judgment (Cont'd) | <input type="checkbox"/> Rent Escrow | <input type="checkbox"/> Commission Issuance | <input type="checkbox"/> Miscellaneous |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Return of Seized Property | | <input type="checkbox"/> Specific Transaction |
| <input type="checkbox"/> Debt | <input type="checkbox"/> Right of Redemption | | <input type="checkbox"/> Structured Settlements |
| <input type="checkbox"/> Fraud | <input type="checkbox"/> Tenant Holding Over | | |

IF NEW OR EXISTING CASE: RELIEF (Check All that Apply)

- | | | | |
|--|---|--|---|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |
| <input type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment | |

If you indicated **Liability** above, mark one of the following. This information is not an admission and may not be used for any purpose other than Track Assignment.

- Liability is conceded. Liability is not conceded, but is not seriously in dispute. Liability is seriously in dispute.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- Under \$10,000 \$10,000 - \$30,000 \$30,000 - \$100,000 Over \$100,000

- Medical Bills \$ _____ Wage Loss \$ _____ Property Damages \$ _____

ALTERNATIVE DISPUTE RESOLUTION INFORMATION

- Is this case appropriate for referral to an ADR process under Md. Rule 17-101? (Check all that apply)
- | | | | |
|----------------|--|--------------------------|--|
| A. Mediation | <input type="checkbox"/> Yes <input type="checkbox"/> No | C. Settlement Conference | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| B. Arbitration | <input type="checkbox"/> Yes <input type="checkbox"/> No | D. Neutral Evaluation | <input type="checkbox"/> Yes <input type="checkbox"/> No |

SPECIAL REQUIREMENTS

- If a Spoken Language Interpreter is needed, check here and attach form **CC-DC-041**
- If you require an accommodation for a disability under the Americans with Disabilities Act, check here and attach form **CC-DC-049**

ESTIMATED LENGTH OF TRIAL

*With the exception of Baltimore County and Baltimore City, please fill in the estimated **LENGTH OF TRIAL**.*

(Case will be tracked accordingly)

- | | |
|---|--|
| <input type="checkbox"/> 1/2 day of trial or less | <input type="checkbox"/> 3 days of trial time |
| <input type="checkbox"/> 1 day of trial time | <input checked="" type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time | |

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- | | |
|---|---|
| <input type="checkbox"/> Expedited - Trial within 7 months of Defendant's response | <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response |
|---|---|

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.

- Expedited** - Trial within 7 months of Defendant's response **Standard** - Trial within 18 months of Defendant's response

IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY, PLEASE FILL OUT THE APPROPRIATE BOX BELOW.

CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

- Expedited Trial 60 to 120 days from notice. Non-jury matters.
- Civil-Short Trial 210 days from first answer.
- Civil-Standard Trial 360 days from first answer.
- Custom Scheduling order entered by individual judge.
- Asbestos Special scheduling order.
- Lead Paint Fill in: Birth Date of youngest plaintiff.....
- Tax Sale Foreclosures Special scheduling order.
- Mortgage Foreclosures No scheduling order.

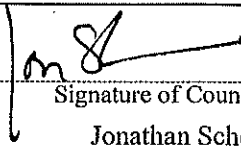
CIRCUIT COURT FOR BALTIMORE COUNTY

- Expedited (Trial Date-90 days) Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus.
- Standard (Trial Date-240 days) Condemnation, Confessed Judgments (Vacated), Contract, Employment Related Cases, Fraud and Misrepresentation, International Tort, Motor Tort, Other Personal Injury, Workers' Compensation Cases.
- Extended Standard (Trial Date-345 days) Asbestos, Lender Liability, Professional Malpractice, Serious Motor Tort or Personal Injury Cases (medical expenses and wage loss of \$100,000, expert and out-of-state witnesses (parties), and trial of five or more days), State Insolvency.
- Complex (Trial Date-450 days) Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

5/25/18
Date

1211 St. Paul Street
Address

Baltimore MD 21202
City State Zip Code


Signature of Counsel / Party

Jonathan Schochor
Printed Name