

• Ramon Antonio Imbert Suriel, aka
Luis Daniel Garcia-Rodriguez,
as the Personal Representative of the
Estate of Ana Linda Perdomo, deceased
Casa #22, Calle La Guarida
Angelina Cotui, Dominican Republic 3553

and

• Ramon Antonio Imbert Suriel, aka
Luis Daniel Garcia-Rodriguez,
as the father and next friend of
Martha Veronica Garcia,
nee Martha Perdomo, minor
Casa #22, Calle La Guarida
Angelina Cotui, Dominican Republic 3553

v.

• Maryland General Hospital, Inc.
827 Linden Avenue
Baltimore, MD 21201
Serve on:
Megan M. Arthur
24th Floor
250 Pratt Street
Baltimore, MD 21201

and

• University of Maryland
Medical System Corporation
22 South Greene Street
Baltimore, MD 21201
Serve on:
Megan M. Arthur
24th Floor
250 Pratt Street
Baltimore, MD 21201

and

* IN THE CIRCUIT COURT
* FOR BALTIMORE CITY
* MARYLAND
*

Case No. 24C12004449

Case: 24-1-12-00449
to file fee
\$80.00
appeal fee
\$40.00
M.C.
\$50.00
file fee
\$50.00

2024/11/13
MAGISTRATE JUDGE
MARYLAND GENERAL
HOSPITAL, INC.
RECEIVED
COURT CLERK
50 13 11 13 10 05

• Wafic Mahmoud EIMasri, M.D.
UCLA Medical Center
10833 LeConte Avenue
Rm 24-127
Los Angeles, CA

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and

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• Earl Lynn Horton, M.D.
827 Linden Avenue
Baltimore, MD 21201

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and

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• Cyrus Jefferson Lawyer, III, M.D.
827 Linden Avenue
Baltimore, MD 21201

*

and

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• Azuka Okafo, CNM
827 Linden Avenue
Baltimore, MD 21201

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and

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• Catherine Salam, CNM, MSN
827 Linden Avenue
Baltimore, MD 21201

*
*

Defendants.

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* * * * *

Complaint and Election for Jury Trial

The Plaintiffs, Ramon Antonio Imbert Suriel, aka Luis Daniel Garcia-Rodriguez, Personal Representative of the Estate of Ana Perdomo, deceased, and Martha Veronica Garcia, *nee* Martha Perdomo, minor, surviving daughter of Ana Linda Perdomo, deceased, by and through her father and next friend Ramon Antonio Imbert Suriel, aka Luis Daniel Garcia-Rodriguez, by their attorneys, Kristen A. Brinster and

John R. Sutherland, Sutherland & Brinster, P.A. and Richard Altmark, Esquire, make claim against the Health Care Providers ("Defendants"), Maryland General Hospital, Inc., University of Maryland Medical System Corporation, Wafic Mahmoud EIMasri, M.D., Earl Lynn Horton, M.D., Azuka Okafo, CNM, Cyrus Jefferson Lawyer, III, M.D., and Catherine Salam, CNM, MSN. This claim has been waived from the Health Claims Alternative Dispute Resolution Office of Maryland, HCDRO Case No. 2011-170 pursuant to Md. Cts. & Jud. Proc. Code Ann §3-2A-06A. A copy of the Order of Transfer dated June 5, 2012, is attached.

COUNT I

1. Plaintiff Luis Daniel Garcia-Rodriguez is the Personal Representative of the Estate of Ana Linda Perdomo, deceased.
2. Venue is proper in Baltimore City as the defendants carry on their professional activities in said City and the alleged negligence of the defendants occurred in Baltimore City.
3. The amount claimed in this Count exceeds Thirty Thousand (\$30,000.00) Dollars.
4. At all times hereinafter complained of, the Defendant Maryland General Hospital, Inc. ("Hospital") was a hospital facility licensed in the State of Maryland to provide primary health care to the public which held itself out as capable of complying with accepted standards of care practiced by those other hospitals which were in its same class and operating under the same or similar circumstances. Maryland General Hospital is liable under respondeat superior for the conduct of its employees and

agents and for its own institutional negligence. Reference herein to Maryland General Hospital includes its agents, servants and employees, including, but not limited to Wafic Mahmoud ElMasri, M.D., Earl Lynn Horton, M.D., Cyrus Jefferson Lawyer, III, M.D., Azuka Okafo, CNM, and Catherine Salam, CNM, MSN. As a hospital whose practice included, but was not limited to, obstetrics, internal medicine, critical care, surgery, and primary health care, the hospital and its agents, servants or employees, was under a duty to exercise that degree of care required by other hospitals in the same class to which it belonged and acting under the same or similar circumstances. It is alleged that Maryland General Hospital, and its agents, servants or employees, breached this duty to Plaintiffs' decedent and to the surviving Plaintiffs resulting in the death of decedent Ana Linda Perdomo on June 1, 2008.

5. At all times hereinafter complained of, Defendant University of Maryland Medical System Corporation was the owner and/or operator of Defendant Maryland General Hospital, and/or possessed, controlled, managed and/or operated Defendant Maryland General Hospital by and through its employees, acting for its own business and within the course and scope of their employment, with its principle place of business located at the address set forth above.

6. At all times hereinafter complained of, the Defendant University of Maryland Medical System Corporation owned and/or operated Maryland General Hospital, licensed in the State of Maryland to provide primary health care to the public which held itself out as capable of complying with accepted standards of care practiced by those other hospitals which were in its same class and operating under the same or similar circumstances. University of Maryland Medical System Corporation is liable

under respondeat superior for the conduct of its employees and agents and for its own institutional negligence. Reference herein to University of Maryland Medical System Corporation ("Medical System") includes its agents, servants and employees, including, but not limited to Wafic Mahmoud ElMasri, M.D., Earl Lynn Horton, M.D., Cyrus Jefferson Lawyer, III, M.D., Azuka Okafo, CNM, and Catherine Salam, CNM, MSN. As a Medical System whose practice included, but was not limited to, obstetrics, internal medicine, critical care, surgery, and primary health care, the Medical System and its agents, servants or employees, was under a duty to exercise that degree of care required by other medical systems in the same class to which it belonged and acting under the same or similar circumstances. It is alleged that University of Maryland Medical System Corporation, and its agents, servants or employees, breached this duty to Plaintiffs' decedent and to the surviving Plaintiffs resulting in the death of decedent Ana Linda Perdomo on June 1, 2008.

7. At all times hereinafter complained of, the Defendant Wafic Mahmoud ElMasri, M.D. (hereinafter "ElMasri") was a medical doctor licensed to practice medicine in the State of Maryland. In such capacity he had a duty to the public, to the Plaintiffs' decedent, and to the surviving Plaintiffs herein, to exercise that degree of care required of other physicians in the same class to which he belonged and acting under the same or similar circumstances. It is alleged herein that ElMasri breached this duty to Plaintiffs' decedent and to the surviving Plaintiffs resulting in the death of decedent Ana Linda Perdomo on June 1, 2008.

8. ElMasri was at all times acting as the real and apparent agent of Maryland General Hospital, Inc. and University of Maryland Medical System Corporation.

9. At all times hereinafter complained of, the defendant Earl Lynn Horton, M.D. (hereinafter "Horton") was a medical doctor licensed to practice medicine in the State of Maryland. In such capacity he had a duty to the public, to the Plaintiffs' decedent, and to the surviving Plaintiffs herein, to exercise that degree of care required of other physicians in the same class to which he belonged and acting under the same or similar circumstances. It is alleged herein that Horton breached this duty to Plaintiffs' decedent and to the surviving Plaintiffs resulting in the death of decedent Ana Linda Perdomo on June 1, 2008.

10. Horton was at all times acting as the real and apparent agent of Maryland General Hospital, Inc. and University of Maryland Medical System Corporation.

11. At all times hereinafter complained of, the defendant Cyrus Jefferson Lawyer, III, M.D. (hereinafter "Lawyer") was a medical doctor licensed to practice medicine in the State of Maryland. In such capacity he had a duty to the public, to the Plaintiffs' decedent, and to the surviving Plaintiffs herein, to exercise that degree of care required of other physicians in the same class to which he belonged and acting under the same or similar circumstances. It is alleged herein that Lawyer breached this duty to Plaintiffs' decedent and to the surviving Plaintiffs resulting in the death of decedent Ana Linda Perdomo on June 1, 2008.

12. Lawyer was at all times acting as the real and apparent agent of Maryland General Hospital, Inc. and University of Maryland Medical System Corporation.

13. At all times hereinafter complained of, the defendant Azuka Okafo, CNM, (hereinafter "Okafo") was a certified nurse midwife licensed to practice medicine in the State of Maryland. In such capacity she had a duty to the public, to the Plaintiffs'

decedent, and to the surviving Plaintiffs herein, to exercise that degree of care required of other certified nurse midwives in the same class to which she belonged and acting under the same or similar circumstances. It is alleged herein that Okafo breached this duty to Plaintiffs' decedent and to the surviving Plaintiffs resulting in the death of decedent Ana Linda Perdomo on June 1, 2008.

14. Okafo was at all times acting as the real and apparent agent of Maryland General Hospital, Inc. and University of Maryland Medical System Corporation.

15. At all times hereinafter complained of, the defendant Catherine Salam, CNM, MSN, (hereinafter "Salam") was a certified nurse midwife licensed to practice medicine in the State of Maryland. In such capacity she had a duty to the public, to the Plaintiffs' decedent, and to the surviving Plaintiffs herein, to exercise that degree of care required of other certified nurse midwives in the same class to which she belonged and acting under the same or similar circumstances. It is alleged herein that Salam breached this duty to Plaintiffs' decedent and to the surviving Plaintiffs resulting in the death of decedent Ana Linda Perdomo on June 1, 2008.

16. Salam was at all times acting as the real and apparent agent of Maryland General Hospital, Inc. and University of Maryland Medical System Corporation.

17. On May 30, 2008, Ana Perdomo, was seen at the People's Community Health Center for her regularly scheduled clinic visit, where her blood pressure was elevated and 4+ protein was detected in her urine. Suspecting preeclampsia that required evaluation and monitoring at a hospital, the clinic sent her to Maryland General Hospital. Upon arrival at the hospital, Ms. Perdomo was examined and evaluated by obstetrician Earl Lynn Horton, M.D., who admitted her for "induction of labor for

elevated BP.” After reviewing the chart and examining the patient, Defendant Horton confirmed the plan to induce, writing “Admit & Induce...Agree with plan of management.” Despite Ms. Perdomo’s baby presenting in a footling breech position, the defendants negligently began to induce her labor.

18. At 1754, despite ongoing signs of severe preeclampsia and the fetus’ breech position, Azuka Okafo, CNM, inserted the first Cervidil. Ms. Perdomo’s blood pressure remained high, in the severe preeclampsia range.

19. At 2205, the medical records indicate “Dr. Horton notified of pt condition”, and that his plan was to “continue to monitor BP.” Ms. Perdomo’s blood pressures remained in the severe preeclampsia range.

20. Despite the baby presenting in breech position, a contraindication to induction of labor, on May 31, at 0830, the second Cervidil was inserted by Catherine Salam, CNM. Ms. Perdomo’s blood pressure remained high and protein continued to be found in her urine, both signs of severe preeclampsia.

21. After more than 26 hours of labor being induced, examination of Ms. Perdomo revealed her baby to be in a breech presentation, a contraindication to induction.

22. Induction of labor was halted; and plans for a cesarian section commenced.

23. Over an hour later, at 2128, Ms. Perdomo’s baby was delivered via cesarian section by Defendant EIMasri.

24. Ms. Perdomo’s postoperative course was complicated by postpartum hemorrhage and episodic vaginal bleeding. Despite being notified of the ongoing

bleeding, protein in the urine, and abnormal lab values, Dr. EIMasri did not examine Ms. Perdomo until 0500 on June 1, 2008.

25. At 0630, Defendant EIMasri reexplored Ms. Perdomo's uterus under anesthesia with ultrasound guidance. Ms. Perdomo was given two units of packed red blood cells.

26. Following this procedure, Ms. Perdomo awoke and complained of pain. She remained intubated due to her declining medical condition and was transferred to the Intensive Care Unit.

27. In the early afternoon of June 1, 2008, an intrabdominal ultrasound showed fluid around the kidneys and Ms. Perdomo was tachypnic and tachycardic. Dr. Lawyer, the "on-call ob/gyn" now responsible for Ms. Perdomo, refused to examine or treat Ms. Perdomo. Dr. Lawyer's only guidance given was to follow up "CBC and give blood product" which had already been done. As the afternoon progressed, Ms. Perdomo became repeatedly hypoxic and her abdomen distended. Again it was noted that "Dr. Lawyer refused to come to evaluate patient or to collaborate treatment." Ms. Perdomo's abdomen became "completely distended." Only after being paged overhead late in the afternoon due to Ms. Perdomo's further decline, did Dr. Lawyer arrive to evaluate Ms. Perdomo. Dr. Lawyer opined that at this point there was no option for surgery and he offered no treatment. At 17:45 Ms. Perdomo was pronounced dead.

28. An autopsy was performed by J. Laron Locke, M.D., the Assistant Chief Medical Examiner of the State of Maryland, who opined that Ms. Perdomo died of complications of preeclampsia.

29. The standard of care required that Defendants Horton, EIMasri, Lawyer,

Okafo, and Salam, for a patient with Ms. Perdomo's history and presentation, investigate to rule out and appropriately treat potentially life-threatening pathology. Such investigation would include, but not be limited to, examination of Ms. Perdomo to reveal the correct position of her fetus prior to and during induction of labor; management of her hypertension and worsening preeclampsia; recognition and appreciation of the significance of the clinical findings, including, but not limited to, the potential severity and risk of continuing Ms. Perdomo's pregnancy in the face of increasingly severe preeclampsia; and expediting surgical delivery of Ms. Perdomo's baby to reduce or eliminate life-threatening complications, including, but not limited to, preeclampsia.

30. Defendants, either individually or through their agents, breached the standard of care in that they failed to properly attend to, adequately monitor, or correctly evaluate and treat Ana Perdomo's declining medical condition, including, but not limited to, negligently inducing her labor when her fetus was in breech position; failing to make a timely decision to deliver by cesarean section; failing to take timely and adequate steps to prepare for a cesarean section; failing to recognize and appreciate the significance of the clinical findings; failing to timely recognize and respond to Ms. Perdomo's worsening preeclampsia and deteriorating medical condition; failing to adequately monitor, correctly evaluate, and treat Ana Perdomo post-delivery; including, but not limited to, failing to adequately evaluate and treat her post-delivery bleeding; negligently administering blood products; failing to respond to ultrasound findings; failing to timely respond to signs and symptoms of blood transfusion reaction and DIC; and failing to timely employ effective corrective measures.

31. The defendants were in other respects negligent.

32. As a result of the separate or combined breaches of the accepted standard of care by the defendants, Plaintiffs' decedent was proximately caused to suffer excruciating physical and emotional pain and agony prior to her death and then to die.

33. If the defendants had complied with the standard of care, the pathological processes would have been diagnosed, treated, and Ms. Perdomo's premature and unnecessary death would have been avoided.

34. Luis Daniel Garcia-Rodriguez, Personal Representative of the Estate of Ana Linda Perdomo, deceased, demands those damages which the decedent could have recovered had she survived, including, but not limited to, conscious pain and suffering.

35. There is no contributory negligence on the part of the Plaintiffs or Plaintiffs' decedent.

36. There is no assumption of risk on the part of the Plaintiff or the Plaintiffs' decedent.

37. The Plaintiffs were otherwise injured and damaged.

WHEREFORE, this claim is brought seeking damages in excess of Thirty Thousand (\$30,000.00) Dollars.

COUNT II

38. Count One, paragraphs one through thirty-seven, is adopted by reference.

39. The defendants, and their real and apparent agents and employees, had a duty to obtain the Decedent's informed consent. This duty required the agents and

employees of the defendants to provide all material information concerning the proposed treatment and alternatives to the proposed treatment. This duty required the defendants to disclose every material risk of negative consequences of the treatment being proposed. A material risk is a risk which would be significant to a reasonable person who is asked to decide whether to consent to a particular medical treatment or procedure.

40. The defendants breached the duty to obtain informed consent because they failed to advise of the material risks of and alternatives to the procedures performed on Ms. Perdomo and those not performed, and failed to advise of the available alternatives.

41. The defendants failed to obtain informed consent in other respects.

42. As a result of the defendants' failure to obtain informed consent, Plaintiffs' decedent was caused to suffer excruciating pain and agony prior to her death and then to die.

WHEREFORE, this claim is brought seeking damages in excess of Thirty Thousand (\$30,000.00) Dollars.

COUNT III

43. The Plaintiff, Martha Veronica Garcia, *nee* Martha Perdomo, minor, daughter of Ana Linda Perdomo, deceased, by and through her father and next friend Luis Daniel Garcia-Rodriguez, adopts by reference Counts One and Two, paragraphs one through forty-two.

44. Martha Veronica Garcia, *nee* Martha Perdomo, minor, was the decedent's natural daughter at the time of decedent's death.

45. As a result of the negligence of Defendants, and the agents, servants or employees of the defendants, which resulted in decedent's death, the Plaintiff has been deprived of decedent's support, companionship, comfort, protection, parental care, society, attention, advice, counsel, training, guidance and education. The Plaintiff has in the past experienced, is experiencing, and will continue to experience emotional pain and suffering as a result of the death of her mother and has been otherwise injured and damaged.

WHEREFORE, this claim is brought and Plaintiff seeks damages in excess of Thirty Thousand (\$30,000.00) Dollars.

SUTHERLAND & BRINSTER, P.A.



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John R. Sutherland, Esquire
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(410) 992-1992

Attorneys for the Plaintiffs

Ramon Antonio Imbert Suriel, aka
Luis Daniel Garcia-Rodriguez,
as the Personal Representative of the
Estate of Ana Linda Perdomo, deceased, et al.

Plaintiffs

v.

Maryland General Hospital, Inc., et al.

Defendants.

* IN THE CIRCUIT COURT
* FOR BALTIMORE CITY
* MARYLAND


* Case No. 24C12004449

* * * * *

Election for Jury Trial

Plaintiffs hereby elect trial by jury.

SUTHERLAND & BRINSTER, P.A.



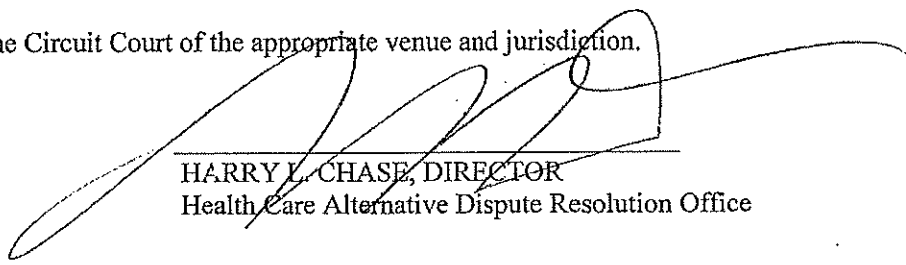
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(410) 992-1992
Attorneys for the Plaintiffs

LUIS DANIEL GARCIA-RODRIGUEZ, * BEFORE THE
 As the Personal Representative of the * HEALTH CARE
 ESTATE OF ANA LINDA PERDOMO, *
 Deceased, and as father and next friend of * ALTERNATIVE DISPUTE
 MARTHA VERONICA GARCIA, Minor, *
 Claimants * RESOLUTION OFFICE
 v. *
 MARYLAND GENERAL HOSPITAL, *
 et al. *
 Health Care Providers * HCA No.: 2011-170
 *

ORDER OF TRANSFER

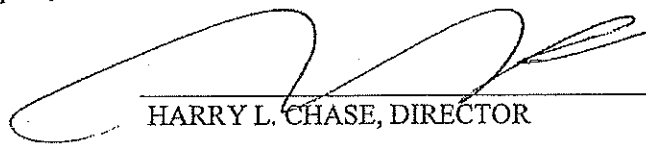
The Health Care Providers, having elected a Waiver of Arbitration under the
 provisions of Annotated Code of Maryland, Courts and Judicial Proceedings Art., § 3-
 2A-06B(c), it is this 5th day of June 2012, by the Health Care
 Alternative Dispute Resolution Office,

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 and jurisdiction.


 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

RECEIVED
BALTIMORE CITY
12 JUL 25 PM 3:06

Circuit Court for Baltimore City 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). A copy must be included for each defendant to be served.
Defendant: You must file an Information Report as required by Rule 2-323(h).
THIS INFORMATION REPORT CANNOT BE ACCEPTED AS AN ANSWER OR RESPONSE.

FORM FILED BY: PLAINTIFF DEFENDANT CASE NUMBER _____
 Ramon Antonio Imbert Suriel, aka Luis Daniel Garcia-Rodriguez, (Clerk to insert)
 CASE NAME: as the Personal Representative of the Estate of _____ vs. Maryland General Hospital, Inc., et al.
 Ana Linda Perdomo, deceased, et al. Plaintiff Defendant
 JURY DEMAND: Yes No Anticipated length of trial: _____ hours or 5 days
 RELATED CASE PENDING? Yes No If yes, Case #(s), if known: _____
 Special Requirements? Interpreter (Please attach Form CC-DC 41)
 ADA accommodation (Please attach Form CC-DC 49)

NATURE OF ACTION (CHECK ONE BOX)		DAMAGES/RELIEF	
TORTS <input type="checkbox"/> Motor Tort <input type="checkbox"/> Premises Liability <input type="checkbox"/> Assault & Battery <input type="checkbox"/> Product Liability <input checked="" type="checkbox"/> Professional Malpractice <input checked="" type="checkbox"/> Wrongful Death <input type="checkbox"/> Business & Commercial <input type="checkbox"/> Libel & Slander <input type="checkbox"/> False Arrest/Imprisonment <input type="checkbox"/> Nuisance <input type="checkbox"/> Toxic Torts <input type="checkbox"/> Fraud <input type="checkbox"/> Malicious Prosecution <input type="checkbox"/> Lead Paint <input type="checkbox"/> Asbestos <input type="checkbox"/> Other _____	LABOR <input type="checkbox"/> Workers' Comp. <input type="checkbox"/> Wrongful Discharge <input type="checkbox"/> EEO <input type="checkbox"/> Other _____ CONTRACTS <input type="checkbox"/> Insurance <input type="checkbox"/> Confessed Judgment <input type="checkbox"/> Other _____ REAL PROPERTY <input type="checkbox"/> Judicial Sale <input type="checkbox"/> Condemnation <input type="checkbox"/> Landlord Tenant <input type="checkbox"/> Other _____ OTHER <input type="checkbox"/> Civil Rights <input type="checkbox"/> Environmental <input type="checkbox"/> ADA <input type="checkbox"/> Other _____	A. TORTS Actual Damages <input type="checkbox"/> Under \$7,500 <input type="checkbox"/> \$7,500 - \$50,000 <input type="checkbox"/> \$50,000 - \$100,000 <input checked="" type="checkbox"/> Over \$100,000 <input type="checkbox"/> Medical Bills \$ _____ <input type="checkbox"/> Property Damages \$ _____ <input type="checkbox"/> Wage Loss \$ _____	B. CONTRACTS <input type="checkbox"/> Under \$10,000 <input type="checkbox"/> \$10,000 - \$20,000 <input type="checkbox"/> Over \$20,000 C. NONMONETARY <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction <input type="checkbox"/> Other _____

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 Yes No
 B. Arbitration Yes No
 C. Settlement Conference Yes No
 D. Neutral Evaluation Yes No

TRACK REQUEST
 With the exception of Baltimore County and Baltimore City, please fill in the estimated LENGTH OF TRIAL.
THIS CASE WILL THEN BE TRACKED ACCORDINGLY.
 1/2 day of trial or less 3 days of trial time
 1 day of trial time More than 3 days of trial time
 2 days of trial time

PLEASE SEE PAGE TWO OF THIS FORM FOR INSTRUCTIONS PERTAINING TO THE BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM AND COMPLEX SCIENCE AND/OR MEDICAL CASE MANAGEMENT PROGRAM (ASTAR), AS WELL AS ADDITIONAL INSTRUCTIONS IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, PRINCE GEORGE'S COUNTY, OR BALTIMORE COUNTY.
 Date 7/23/12 Signature [Signature]

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-205 is requested, attach a duplicate copy of complaint and check one of the tracks below.

Expedited
Trial within 7 months
of Filing

Standard
Trial within 18 months
of Filing

EMERGENCY RELIEF REQUESTED _____

Signature

Date

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

*FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO AN ASTAR RESOURCE JUDGE under Md. Rule 16-202.
Please check the applicable box below and attach a duplicate copy of your complaint.*

Expedited - Trial within 7 months of Filing

Standard - Trial within 18 months of Filing

IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, PRINCE GEORGE'S COUNTY, 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.
- Standard-Short Trial 210 days.
- Standard Trial 360 days.
- Lead Paint Fill in: Birth Date of youngest plaintiff _____.
- Asbestos Events and deadlines set by individual judge.
- Protracted Cases Complex cases designated by the Administrative Judge.

CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY

To assist the Court in determining the appropriate Track for this case, check one of the boxes below. 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.

CIRCUIT COURT FOR BALTIMORE COUNTY

- | | |
|---|---|
| <input type="checkbox"/> Expedited
(Trial Date-90 days) | Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus. |
| <input type="checkbox"/> 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. |
| <input type="checkbox"/> 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. |
| <input type="checkbox"/> Complex
(Trial Date-450 days) | Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases. |