

and

METROPOLITAN OB/GYN ASSOCIATES, LLC *
920-940 W. North Avenue *
Baltimore, Maryland 21217 *

Serve on: *
Cyrus Lawyer, III *
11510 Homewood Road *
Ellicott City, Maryland 21042 *

and

CYRUS LAWYER, III, M.D. *
934 W. North Avenue *
Baltimore, Maryland 21217 *

and

JANNA MUDD, M.D. *
341 N. Calvert Street, Suite 201 *
Baltimore, Maryland 21202 *

Defendants *

* * * * *

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiffs, Ava Pierce, a minor, by and through her Parents and Next Friends, Candeece Pierce and Melvin Pierce; Candeece Pierce, Individually; and Melvin Pierce, Individually, by and through their undersigned attorneys, hereby sue Mercy Medical Center, Inc., University of Maryland Medical System Corporation, Metropolitan OB/GYN Associates, LLC, Cyrus Lawyer, III, M.D., and Janna Mudd, M.D., and for their causes of action state as follows:

JURISDICTION AND VENUE

1. This medical negligence claim is instituted pursuant to Md. Cts. & Jud. Proc. §§ 3-2A-01 – 3-2A-10, for the recovery of damages in excess of Thirty Thousand Dollars

(\$30,000.00). All conditions precedent to the filing of this lawsuit have been satisfied, including the filing of a Complaint, Certificate of Merit and Expert Report, and Waiver of Arbitration in the Health Care Alternative Dispute Resolution Office of Maryland.

2. Venue is proper in Baltimore City, Maryland.

3. Plaintiffs hereby attach and incorporate by reference the Certificate of Merit and Expert Report of Michael Cardwell, M.D.

4. Defendant Mercy Medical Center, Inc. (hereinafter "Mercy Medical Center") is, and at all times relevant hereto was, a corporation engaged in the operation of a hospital, providing obstetrical care and other medical services, to individuals in need thereof. At all times material hereto, Mercy Medical Center acted directly and/or by and/or through its actual and/or apparent agents, servants and/or employees, including, but not limited to, Cyrus Lawyer, III, M.D., Janna Mudd, M.D., and the labor and delivery nursing personnel at Mercy Medical Center.

5. Defendant University of Maryland Medical System Corporation (hereinafter "UMMS") is, and at all times relevant hereto was, a corporation engaged in the operation of providing health care services, including obstetrical care and other medical services, to individuals in need thereof. At all times material hereto, UMMS acted directly and/or by and/or through its actual and/or apparent agent, servant and/or employee, including, but not limited to, Janna Mudd, M.D.

6. Defendant Metropolitan OB/GYN Associates, LLC (hereinafter "Metropolitan OG/GYN") is, and at all times relevant hereto was, a limited liability company engaged in the operation of providing health care services, including obstetrical care and other medical services, to individuals in need thereof. At all times material hereto, Metropolitan OB/GYN acted directly

and/or by and/or through its actual and/or apparent agent, servant and/or employee, including, but not limited to, Cyrus Lawyer, III, M.D.

7. Defendant Cyrus Lawyer, III, M.D. is, and at all times relevant hereto was, a physician licensed to practice medicine, including obstetrics and gynecology, in the State of Maryland. At all times material hereto, Dr. Lawyer acted individually and/or as the actual and/or apparent agent, servant and/or employee of Defendants Mercy Medical Center and/or Metropolitan OB/GYN.

8. Defendant Janna Mudd, M.D. is, and at all times relevant hereto was, a physician licensed to practice medicine, including obstetrics and gynecology, in the State of Maryland. At all times material hereto, Dr. Mudd acted individually and/or as the actual and/or apparent agent, servant and/or employee of Defendants Mercy Medical Center and/or UMMS.

STATEMENT OF FACTS

9. According to the medical records, Candece Pierce became pregnant in November of 2005.

10. On September 2, 2006, at approximately 4:30 a.m., she presented to labor and delivery at Mercy Medical Center with complaints of contractions approximately 4 to 5 minutes apart. At the time, she was 39 and 6/7 weeks gestation.

11. Ms. Pierce was hooked up to an electronic fetal monitor at approximately 4:30 a.m. The fetal heart rate tracing was described as showing positive variability with a fetal heart rate in the 140's.

12. In triage, Ms. Pierce's vital signs were taken and her temperature was recorded as 100.5 degrees Fahrenheit.

13. A sterile vaginal exam was performed at approximately 4:40 a.m., which showed that Ms. Pierce was 3.5 cm dilated and 90 percent effaced, and that her baby was in the -2/-3 station.

14. Ms. Pierce continued to labor throughout the morning hours of September 2, 2006.

15. At approximately 9:25 a.m., another sterile vaginal exam was performed by Dr. Janna Mudd. Dr. Mudd found that Ms. Pierce was now 4-5 cm dilated, still 90 percent effaced, and that Ms. Pierce's baby was still in the -2 station.

16. At approximately 10:24 a.m., an epidural was placed. Thereafter, the fetal heart rate tracing began exhibiting persistent periods of absent and/or minimal variability.

17. Dr. Mudd performed another sterile vaginal exam at approximately 12:48 a.m. According to the SVE, Ms. Pierce was still 5 cm dilated, now 100 percent effaced and the fetus was in the -1 station. Around this time, Dr. Mudd also artificially ruptured Ms. Pierce's membranes, which showed clear fluid.

18. At approximately 12:55 p.m., an intrauterine pressure catheter was placed.

19. By 1:00 p.m. on September 2, 2006 it was apparent that Ms. Pierce had made inadequate progress through the first stage of labor as she was 4-5 cm dilated for approximately 8 hours. Moreover, around this time period, the fetal heart tracing was non-reassuring with absent-to-minimal variability and subtle late decelerations. Accordingly, the applicable standards of care required the performance of a timely cesarean section upon Ms. Pierce. However, the Defendants, including, but not limited to, Dr. Mudd and Dr. Cyrus Lawyer, negligently proceeded with a trial of labor and negligently failed to perform a timely cesarean section delivery.

20. At approximately 2:27 p.m., Dr. Lawyer came into Ms. Pierce's room to evaluate the fetal hear rate tracing.

21. At approximately 2:30 p.m., he ordered the administration of Pitocin to induce contractions, and Unasyn for suspected chorioamniotitis in labor. Given the non-reassuring nature of the fetal heart rate tracing, the failure to progress and a question of chorioamniotitis, the plan to induce with Pitocin was also a violation of applicable standards of care.

22. Shortly after the administration of Pitocin, the fetal heart rate tracing became erratic with an elevated fetal heart rate baseline and deep decelerations. Despite these findings, in addition to evidence of uterine hyperstimulation, the Defendants negligently proceeded with the induction and trial of labor.

23. Dr. Lawyer performed a sterile vaginal exam at 5:05 p.m., which showed the Ms. Pierce was 8-9 cm dilated and 100 percent effaced. Around this time, the fetal heart rate tracing showed almost undetectable variability and the tocodynamometer was showing evidence of hyperstimulation. Again, the Defendants negligently proceeded with the induction and trial of labor and negligently failed to perform a timely cesarean section.

24. By approximately 6:17 p.m., the Pitocin had been increased to 12 mu.

25. At approximately 7:30 p.m., the Defendants negligently had Ms. Pierce push, which resulted in continuous fetal heart rate decelerations that continued until 7:51 p.m.

26. Eventually, the decision was made to perform a cesarean section, and Ava Pierce was born at 8:16 p.m. on September 2, 2006.

27. At birth, Ava was in respiratory distress and her umbilical cord was found to be wrapped around her neck. Her Apgar scores were 3 and 7 at one and five minutes respectively.

28. According to the medical records, she had poor tone and poor respiratory effort at delivery. Furthermore, a large amount of meconium was suctioned from her oropharynx.

29. Ava was transferred to the NICU and placed in 100 percent oxyhood and given a saline bolus because of her poor condition. A repeat blood gas in the NICU showed metabolic acidosis, and as a result, the health care providers administered sodium bicarbonate, and eventually dopamine.

30. On the first day of life, Ava began experiencing seizures.

31. According to the medical records, Ava currently suffers from seizures disorder, mental retardation, spastic cerebral palsy with quadriplegia and microcephaly secondary to hypoxic-ischemic encephalopathy.

32. With reasonable medical probability, if the Defendant had complied with the applicable standards of care and timely and appropriately delivered Ava Pierce via cesarean section, she would not have suffered her alleged injuries and damages, including, but not limited to, cerebral palsy, seizure disorder and mental retardation.

COUNT I
(Medical Malpractice)

Plaintiff, Ava Pierce, a minor, by and through her Parents and Next Friends, Candace Pierce and Melvin Pierce, and by and through her undersigned attorneys, hereby sues all of the Defendants, and for her cause of action states as follows:

33. Plaintiff repeats, re-alleges, adopts, and incorporates by reference the above paragraphs of this Complaint as if fully set forth herein.

34. In their care and treatment of the Plaintiff, the Defendants, acting individually and/or by and/or through their actual and/or apparent agents, servants, and/or employees, owed Plaintiff the duty to exercise that degree of care and skill which a reasonably competent hospital,

obstetrician, physician, labor and delivery nurse, and/or similar health care provider, would have exercised under similar circumstances.

35. The Defendants, acting individually and/or by and/or through their actual and/or apparent agents, servants, and/or employees, breached the aforesaid duty of care to Ava Pierce and Candeece Pierce, and were negligent in the following ways, among others:

- a. Failure to take a thorough medical history;
- b. Failure to conduct appropriate and timely examinations;
- c. Failure to utilize appropriate and ancillary procedures;
- d. Failure to timely and adequately recognize Ms. Pierce's and Ava's serious medical condition;
- e. Failure to properly and timely monitor and respond to Plaintiff's true conditions;
- f. Failure to appropriately react to symptoms, signs, and findings that were illustrative of Plaintiff's true condition;
- g. Failure to take appropriate precautions in monitoring and treating Plaintiff's condition;
- h. Failure to obtain appropriate consultations and/or appropriately utilize the information available to them;
- i. Failure to react to the positive history, symptoms, signs, physical findings, and other data which were illustrative of Ms. Pierce's condition;
- j. Failure to react to the positive history, symptoms, signs, and physical findings, and other data which were illustrative of Candeece Pierce's condition;
- k. Failure to timely and appropriately evaluate Ms. Pierce and Ava Pierce;
- l. Failure to timely and appropriately diagnose failure to progress;

- m. Failure to timely and appropriately diagnose fetal distress;
- n. Failure to timely and appropriately recognize non-reassuring fetal heart rate tracings;
- o. Failure to timely and appropriately respond to fetal distress and non-reassuring fetal heart rate tracings;
- p. Failure to appropriately utilize Pitocin;
- q. Failure to timely and appropriately perform a cesarean section upon Candeece Pierce;
- r. Failure to timely and appropriately deliver Ava Pierce.

36. As a direct and proximate result of the above-mentioned deviations from the applicable standards of care by the Defendants, Ava Pierce suffered and/or will suffer the following permanent injuries, among others:

- a. She has undergone serious and painful medical procedures including significant long-term hospitalization;
- b. Reduced cognitive and mental capabilities;
- c. She has and will continue to incur large medical and other care expenses for which she and/or her parents are incapable, unable, and/or unwilling to pay;
- d. Inability to engage in personal, household, and family activities;
- e. Her earning capacity has been severely diminished;
- f. She has and will continue to suffer great pain and suffering;
- g. Developmental disabilities and delays;
- h. Hypoxic-ischemic encephalopathy and its effects;
- i. Severe brain damage;

- j. Neurological disabilities;
- k. She is permanently dependent upon others for her care;
- l. Seizure disorder;
- m. Cerebral palsy and its effects;
- n. Mental Retardation; and
- o. Microcephaly;
- p. Other injuries and damages.

WHEREFORE, Plaintiff, Ava Pierce, a minor, by and through her Parents and Next Friends, Candace Pierce and Melvin Pierce, brings this action against all of the Defendants and seeks damages that will adequately and fairly compensate her, costs, and such other and further relief as may be deemed appropriate.

COUNT II
(Medical Malpractice)

Plaintiffs, Candace Pierce and Melvin Pierce, by and through their undersigned attorneys, hereby sue the Defendants and state as follows:

37. Plaintiffs repeat, re-allege, adopt, and incorporate by reference the above paragraphs of this Complaint as if fully set forth herein.

38. As a further direct and proximate result of the above-mentioned deviations from the applicable standard of care by the Defendants, Candace Pierce and Melvin Pierce have suffered and/or will suffer the following injuries, among others:

- a. They have incurred and will continue to incur substantial expenses for medical treatment and other care of Ava Pierce;
- b. They have suffered and will continue to suffer the loss of services, companionship, labor, assistance, etc. from their child, Ava Pierce; and

- c. They have suffered and will continue to suffer great emotional anguish and pain and suffering as a consequence of the Defendants' negligence as described above.

WHEREFORE, Plaintiffs, Candece Pierce and Melvin Pierce, bring this action against the Defendants and seek damages that will adequately and fairly compensate them, costs, and such other and further relief as may be deemed appropriate.

COUNT III
(Informed Consent)

Plaintiffs, Ava Pierce, a minor, by and through her Parents and Next Friends, Candece Pierce and Melvin Pierce; and Ava Pierce, Individually, by and through their undersigned attorneys, hereby sue the Defendants, and for their causes of action state as follows:

39. Plaintiffs repeat, re-allege, adopt, and incorporate by reference the above paragraphs of this Complaint as if fully set forth herein.

40. The Defendants, acting individually and/or by and/or through its actual and/or apparent agents, servants, and/or employees, owed the Plaintiffs the duty to appropriately notify Candece Pierce of the various alternatives and material risks involved in the various modalities of treatment for the delivery of her daughter, Ava Pierce.

41. The Defendants, acting by individually and/or by and/or through its actual and/or apparent agents, servants, and/or employees, were negligent in the failure to adequately and appropriately obtain the informed consent from Ms. Pierce and were otherwise negligent.

42. Had the Defendants fully informed Candece Pierce of all the risk and benefits associated with undergoing an induction of labor with Pitocin in the context of failure to progress, a non-reassuring fetal heart rate tracing and chorioamniotitis, then Ms. Pierce, like any reasonable person, would have elected not to proceed with a trial of labor and instead would have elected to undergo a cesarean section.

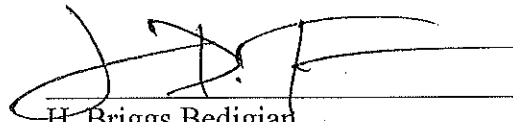
43. Plaintiffs further allege that as a result of the above-described negligent and careless acts and omission of the Defendants, as well as their actual and/or apparent agents, servants, and/or employees, Candace Pierce has suffered the injuries described in Count I above.

44. All of these injuries and damages were caused by the negligence of the Defendants, without any negligence or want of due care on the part of the Plaintiffs contributing thereto.

WHEREFORE, Plaintiffs, Ava Pierce, a minor, by and through her Parents and Next Friends, Candace Pierce and Melvin Pierce; and Candace Pierce, Individually, by and through their undersigned attorneys, bring this action against the Defendants and seek damages that will adequately and fairly compensate them, costs, and such other and further relief as may be deemed appropriate.

Respectfully submitted,

WAIS, VOGELSTEIN & BEDIGIAN, LLC



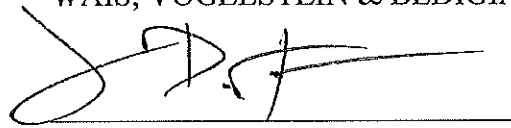
H. Briggs Bedigian
Keith D. Forman
1829 Reisterstown Road
Suite 425
Baltimore, MD 21208
(410) 998-3600
Attorneys for Plaintiffs

JURY TRIAL DEMAND

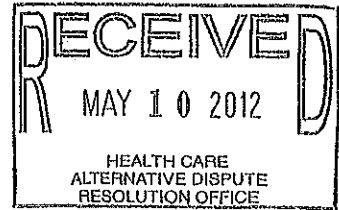
The Plaintiffs hereby demand a trial by jury on all of the issues raised in Plaintiffs' Complaint.

Respectfully submitted,

WAIS, VOGELSTEIN & BEDIGIAN, LLC



H. Briggs Bedigian
Keith D. Forman
1829 Reisterstown Road
Suite 425
Baltimore, MD 21208
(410) 998-3600
Attorneys for Plaintiffs



IN THE HEALTH CARE ALTERNATIVE DISPUTE
RESOLUTION OFFICE OF MARYLAND

AVA PIERCE, a minor, et al. *

Claimants *

v. *

HCA No. _____

MERCY MEDICAL CENTER, INC., et al. *

Defendant Health Care Providers *

* * * * *

MAY 12 2012

CERTIFICATE OF MERIT

I, MICHAEL S. CARDWELL, M.D., hereby certify that the following statements are true and accurate:

1. I, MICHAEL S. CARDWELL, am a board-certified obstetrician and maternal fetal medicine specialist licensed to practice medicine in the State of Texas.

2. In addition to being board-certified in obstetrics and gynecology and maternal fetal medicine, I have clinical experience, have provided consultation relating to clinical practice, and/or taught medicine in the Defendant Health Care Providers' specialty and/or sub-specialties of medicine, or the specialty and/or sub-specialties of medicine practiced by the Defendant Health Care Providers' agents, servants and/or employees, or a related field of health care, within five (5) years of the date of the alleged act or omission giving rise to the underlying cause of action.

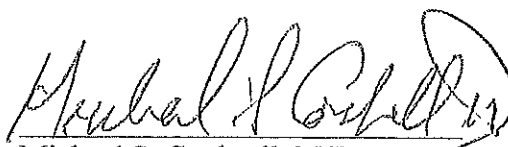
3. From my review of the pertinent medical records, I have concluded with reasonable medical probability that there were deviations from the accepted and applicable standards of care on the part of the Defendant Health Care Providers, Mercy Medical Center, Inc., University of Maryland Medical Systems Corporation, Metropolitan OB/GYN Associates,

LLC, Cyrus Lawyer, M.D. and Janna Mudd, M.D.

4. I have also concluded with reasonable medical probability that these deviations were the direct and proximate cause of the Claimants' alleged injuries and damages.

5 Attached is a brief statement of my opinions in this matter.

6. Less than twenty percent (20%) annually of my professional activities involves testimony in personal injury claims.



Michael S. Cardwell, M.D.

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 _____ (Clerk to insert)

CASE NAME: AVA PIERCE, a minor, et al. vs. MERCY MEDICAL CENTER, INC., et al.
Plaintiff Defendant

JURY DEMAND: Yes No Anticipated length of trial: _____ hours or 15 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

<p>TORTS</p> <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 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 _____	<p>LABOR</p> <input type="checkbox"/> Workers' Comp. <input type="checkbox"/> Wrongful Discharge <input type="checkbox"/> EEO <input type="checkbox"/> Other _____	<p>A. TORTS</p> <p>Actual Damages</p> <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 checked="" type="checkbox"/> Medical Bills \$ <u>To be provided</u> <input type="checkbox"/> Property Damages \$ _____ <input checked="" type="checkbox"/> Wage Loss \$ <u>To be provided</u>
<p>REAL PROPERTY</p> <input type="checkbox"/> Judicial Sale <input type="checkbox"/> Condemnation <input type="checkbox"/> Landlord Tenant <input type="checkbox"/> Other _____	<p>CONTRACTS</p> <input type="checkbox"/> Insurance <input type="checkbox"/> Confessed Judgment <input type="checkbox"/> Other _____	<p>B. CONTRACTS</p> <input type="checkbox"/> Under \$10,000 <input type="checkbox"/> \$10,000 - \$20,000 <input type="checkbox"/> Over \$20,000	<p>C. NONMONETARY</p> <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction <input type="checkbox"/> Other _____
<p>OTHER</p> <input type="checkbox"/> Civil Rights <input type="checkbox"/> Environmental <input type="checkbox"/> ADA <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 C. Settlement Conference Yes No
B. Arbitration 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 5/23/12 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. |

ONE LIBERTY PLACE
1650 MARKET STREET, 36TH FLOOR
PHILADELPHIA, PA 19103
PHONE: 267.386.4940
FAX: 267.386.4942



WVBS
WAIS, VOGELSTEIN & BEDIGIAN LLC

◆ ATTORNEYS AT LAW ◆

1829 REISTERSTOWN ROAD, SUITE 425
BALTIMORE, MARYLAND 21208
PHONE: 410.998.3600
FAX: 410.998.3680
WWW.WVBLEGAL.COM

RECEIVED
CIRCUIT COURT FOR
BALTIMORE CITY

2012 MAY 24 P 2:13
2717 15TH STREET, NW
WASHINGTON, D.C. 20009
PHONE: 202.488.952.9669
FAX: 410.998.3680
CIVIL DIVISION

May 23, 2012

Civil Clerk
Circuit Court for Baltimore City
111 N. Calvert Street
Baltimore, MD 21202

Re: Pierce, et al. v. Mercy Medical Center, Inc., et al.

Dear Clerk:

Enclosed for filing please find one (1) original and five (5) copies of the Civil Non-Domestic Case Information Sheet and Complaint and Demand for Jury Trial, along with a check in the amount of \$155.00 to cover costs of filing the same. Please date stamp the extra copies and return to me in the enclosed self-addressed prepaid envelope.

Kindly return the summons to this office for service via private process.

Thank you for your assistance in this regard.

Very truly yours,

Ruslan Kondratyuk

Enclosures