

JAMES BECKETT-UDOM
4018 Sanlee Road
Randallstown, Maryland 21133

Plaintiff

v.

CYRUS J. LAWYER, III, M.D.
301 St Paul Place
POB 501
Baltimore, Maryland 21202

and

CYRUS J. LAWYER, M.D., P.A.
934 W. North Avenue
Baltimore, Maryland 21217

Serve on: Resident Agent
Cyrus J. Lawyer, M.D.
11510 Homewood Road
Ellicott City, MD 21042

and

EMERSON R. JULIAN, JR., M.D.
315 N. Calvert Street, 2d Floor
Baltimore, Maryland 21202

and

EMERSON R. JULIAN, JR., M.D., P.A.
315 N. Calvert Street, 2d Floor
Baltimore, Maryland 21202

Serve on: Resident Agent
Ronald Small
8338 Veterans Highway
Suite 202A
Millersville, Md. 21108

and

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY

Case No.: 24C11-000622

RECEIVED
CIRCUIT COURT FOR
BALTIMORE CITY
2011 JAN 26 AM 10:55
CASE: 24C11-000622
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COMMENT:
JAMES BECKETT UDOM VS
CYRUS J. LAWYER, III, M.D.,
& ETAL

Receipt #20110000165
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MERCY MEDICAL CENTER, INC. *
301 St Paul Place *
Baltimore, Maryland 21202 *

Serve on: Resident Agent *
Linda H. Jones *
Suite 400 *
218 N. Charles Street *
Baltimore, Maryland 21201 *

Defendants *

COMPLAINT AND ELECTION FOR JURY TRIAL

Plaintiff, James Beckett-Udom, by his attorneys, E. Dale Adkins, III, and Salsbury, Clements, Bekman, Marder and Adkins, L.L.C., files this Complaint against the Defendants, Cyrus J. Lawyer, III, M.D., Cyrus J. Lawyer, III, M.D., P.A., Emerson R. Julian, Jr., M.D., Emerson R. Julian, Jr., M.D., P.A., and Mercy Medical Center, Inc., and state:

Jurisdiction and Venue

1. The amount of this claim exceeds Thirty Thousand Dollars (\$30,000.00).
2. Venue is proper in Baltimore City, Maryland, and may be proper elsewhere.
3. This claim was previously filed in the Health Care Alternative Dispute Resolution Office of Maryland with the Certificate of Qualified Expert and Report of Lawrence Borow, M.D. Claimant elected to waive arbitration and the case was ordered transferred to this Court. Copies of the Election to Waive Arbitration, Order of Transfer and Certificate of Qualified Expert and Report of Lawrence Borow, M.D. are attached as Exhibits 1 through 3.
4. At all times hereinafter set forth, Defendant, Cyrus Lawyer, III, M.D., held himself out to the Plaintiff and to the general public as an experienced, competent, and able

physician and health care provider, possessing or providing that degree of skill and knowledge which is ordinarily possessed by those who devote special study and attention to the practice of obstetrics and gynecology and, as such, owed a duty to the Plaintiff to render that degree of care and treatment which is ordinarily rendered by those who devote special study and attention to the practice of obstetrics and gynecology.

5. At all times hereinafter set forth, Defendant, Emerson R. Julian, Jr., M.D., held himself out to the Plaintiff and to the general public as an experienced, competent, and able physician and health care provider, possessing or providing that degree of skill and knowledge which is ordinarily possessed by those who devote special study and attention to the practice of obstetrics and gynecology and, as such, owed a duty to the Plaintiff to render that degree of care and treatment which is ordinarily rendered by those who devote special study and attention to the practice of obstetrics and gynecology.

6. At all times hereinafter set forth, Defendant, Mercy Medical Center, Inc. (the "Hospital"), was and is a medical facility offering medical and other related services to the general public and in such capacity, such hospital, its agents, servants and/or employees, medical staff and consultants held themselves out as practicing ordinary standards of medical, hospital, obstetrical/gynecological, maternal fetal medicine, and nursing care and, as such, owed a duty to the Plaintiff to render and provide health care within the ordinary standards of medical, hospital, and nursing care, and to exercise reasonable skill and care in the selection of its personnel to provide competent physicians, surgeons, anesthesiologists, technicians, obstetrician/gynecologists, maternal fetal medicine specialists, nurses, and other medical personnel, possessing that degree of skill and knowledge which is ordinarily possessed by those who devote

special study and attention to the practice of medicine, and to supervise and provide its patients with diagnostic and medical services and treatment commensurate with the condition from which the patient suffers and for which patient entered said hospital.

7. At all relevant times, Defendant, Cyrus J. Lawyer, III, M.D., was an agent and/or apparent agent, servant, or employee of the Defendants, Cyrus J. Lawyer, III, M.D., P.A. and Mercy Medical Center.

8. At all relevant times, Defendant, Emerson R. Julian, Jr., M.D., was an agent and/or apparent agent, servant, or employee of the Defendant, Emerson R. Julian, Jr., M.D., P.A. and Mercy Medical Center.

Factual Background

9. Plaintiff adopts and incorporates paragraphs 1 through 8 as if fully set forth herein.

10. On February 23, 1989, the Plaintiff's mother, Jeannette Williams, then known as Jeannette Beckett, had a positive pregnancy test during an office visit with Loreto Lorenzo, M.D. at the Constant Care Medical Center. Doctor Lorenzo, thereafter, referred Ms. Williams to the Defendant, Cyrus J. Lawyer, M.D., for prenatal care.

11. On March 28, 1989, Ms. Williams, who had two prior miscarriages and who, due to her age, was consider high risk, was seen by the Defendant Lawyer. He referred her on for genetic counseling and an OB sonogram.

12. Ms. Williams thereafter had several MS-AFP screening tests in April and May of 1989, all of which showed an elevated level.

13. On June 12, 1989, Ms. Williams had an OB ultrasound, which was considered

normal. Based on the ultrasound, the estimated delivery date was determined to be October 19, 1989.

14. Ms. Williams continued to see the Defendant Lawyer for her pre-natal visits in June, July and August of 1989. At each visit, the fetus was reported to be active. Beginning in August of 1989, Ms. Williams was placed on bed rest and started on Aldomet for elevated blood pressure.

15. On September 5, 1989, the Defendant Lawyer saw Jeannette Williams in his office for a scheduled pre-natal visit. At that visit, gestational age was noted to be 32 weeks and fetal movement was reported. The fetal heart rate was measured to be 140, and Ms. Williams was assessed at 1+ edema. Doctor Lawyer ordered her to undergo a non-stress test every 5 days, but he did not arrange for a non-stress test to be performed that day.

16. On September 6, 1989, Jeannette Williams reported to the Hospital shortly before noon for the first ordered non-stress test with an external monitor. At noon, the external electronic fetal monitoring was begun, and it revealed a baseline fetal heart rate between 120 and 130 with absent variability.

17. During the test, two variable decelerations to 90, each lasting one to one-and-a-half minutes before returning to baseline, were noted. No contractions were palpable at that time. Due to this evidence of fetal distress, a call was placed in to the Defendant Lawyer but he could not be found. Shortly thereafter a call was made to the Defendant Julian who agreed to come in. The late decelerations continued after these calls were made.

18. At 12:55 p.m., Jeannette Williams signed a consent for a cesarean section delivery to be performed by Dr. Julian or Dr. Lawyer; however, despite continuing signs of fetal distress

she was not taken to the labor and delivery room until 1:40 p.m.

19. The Defendant Julian did not arrive arrived in the labor and delivery room until approximately 2 p.m.

20. At 2:31 p.m., the Plaintiff, James Beckett-Udom, was delivered by cesarean section. At delivery, the 3 pound 2 ounce baby Plaintiff was limp and blue, and he was noted to have a tight nuchal cord. He was intubated. The Plaintiff's Apgars were 1 at one minute and 6 at five minutes. Once the Plaintiff's color improved and there were bilateral breath sounds, he was taken to the NICU where the initial blood gas showed a pH of 7.22, pO₂ of 83, and a pCO₂ of 48 with 94% saturation of FIO₂ of 72%.

21. On September 7, 1989, a head ultrasound that was performed on the Plaintiff, James Beckett-Udom, showed marked echogenicity in the right cerebral cortex compatible with an intracerebral hemorrhage on the right side. The right ventricle appeared enlarged, and the left ventricle appeared normal in size.

22. Due to his being found to be thrombocytopenic on admission, the Plaintiff, James Beckett-Udom, was transfused with platelets on September 8, 1989

23. A repeat head ultrasound performed on September 12, 1989, revealed a large intraventricular hemorrhage, as well as mild to moderate dilatation of the left ventricle.

24. A follow-up head ultrasound on September 20, 1989, showed increasing hydrocephalus of the left lateral ventricle, but no evidence of any new hemorrhages.

25. A follow-up September 27, 1989, ultrasound showed persistence of the moderate enlargement of the right lateral ventricle, and another ultrasound performed on October 2, 1989 showed that the dilatation of the left ventricle had increased.

26. A decrease in hydrocephalus was shown on a October 11, 1989, ultrasound; and the ventricles were essentially normal in size and configuration on a final ultrasound performed on October 19, 1989.

27. Prior to being discharge from the Hospital on October 31, 1989, the Plaintiff, James Beckett-Udom, also suffered diffuse coagulopathy with prolonged PT and PTT which eventually resolved, and he suffered from hyperbilirubinemia which also resolved.

28. Post discharge, the Plaintiff, James Beckett-Udom, was followed by several health care providers before being seen and evaluated by the providers at the Kennedy Krieger Institute who diagnosed him with (a) cerebral palsy - left spastic hemiplegia, (b) cognitive delay, (c) neurobehavioral problems - attention difficulties, tantruming and self-stimulating behavior, (d) mild speech delay, (e) homonymous hemianopsia, and (f) left exotrpia.

Count I - Negligence

29. Plaintiff adopts and incorporates paragraphs 1 through 28 as if fully set forth herein.

30. The Defendant, Cyrus J. Lawyer, III, M.D., was negligent in that he:

- a. failed to have a non-stress test performed on September 5, 1989;
- b. failed to respond to calls on September 6, 1989 or to arrange for appropriate coverage in his absence;
- c. and was negligent in other ways.

31. The Defendant, Emerson R. Julian, Jr., M.D., was negligent in that he:

- a. failed to deliver the Plaintiff in a timely, safe and prudent fashion;
- b. failed to arrange for appropriate coverage prior to his arrival at the

Hospital;

- c. and was negligent in other ways.

32. The Defendant, Mercy Medical Center, Inc, by and through its agents and employees, was negligent in that it:

- a. failed to have Jeannette Williams taken to the labor and delivery room in a timely fashion;
- b. failed to have a system in place to assure that the Plaintiff would be delivered in a timely, safe and prudent fashion;
- c. failed to obtain another health care provider to assist in a timely delivery
- d. and was negligent in other ways.

33. As a result of the negligence of the Defendants, the Plaintiff, James Beckett-Udom, was caused to sustained and aggravate serious and painful injuries to his head, body and limbs, including but not limited to severe brain injury and dysfunction and profound mental retardation, and severe physical pain and mental anguish; whereas he required and will require in the future, hospital and medical care for the remainder of his life, will be unable to engage in any normal activities, employments and pursuits, will sustain a total loss of earnings and earning capacity and was otherwise injured and damaged.

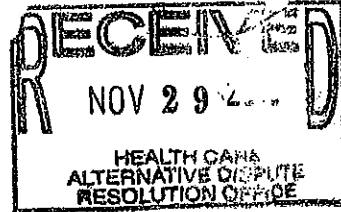
34. That all of the injuries and damages aforesaid were caused solely by the negligence of the Defendants without any negligence on the part of the Plaintiff, James Beckett-Udom, thereunto contributing.

WHEREFORE, this claim is brought and Plaintiff, James Beckett-Udom, claims damages in an amount to be determined by a jury.



E. Dale Adkins, III
Salsbury, Clements, Bekman, Marder
& Adkins, L.L.C.
300 W. Pratt Street, Suite 450
Baltimore, Maryland 21201
(410) 539-6633

Attorneys for Plaintiff



JAMES BECKETT-UDOM

Claimant

v.

CYRUS J. LAWYER, III, M.D.,
et al

Health Care Providers

* IN THE
* HEALTH CARE
* ALTERNATIVE DISPUTE
* RESOLUTION OFFICE
* HCA No.: 2010-459
*

ELECTION TO WAIVE ARBITRATION

Plaintiff, James Beckett-Udom, by his attorneys, E. Dale Adkins, III and Salsbury, Clements, Bekman, Marder & Adkins, LLC, elects to waive arbitration fo this matter.

E. Dale Adkins, III
Salsbury, Clements, Bekman, Marder
& Adkins, LLC
300 West Pratt Street, Suite 450
Baltimore, Maryland 21201
410-539-6633

Attorneys for Plaintiff

IN THE HEALTH CARE ALTERNATIVE DISPUTE RESOLUTION OFFICE

JAMES BECKETT-UDOM

Claimant

HCA No.: 2010-459

Vs.

CYRUS J. LAWYER, III, MD, et al.

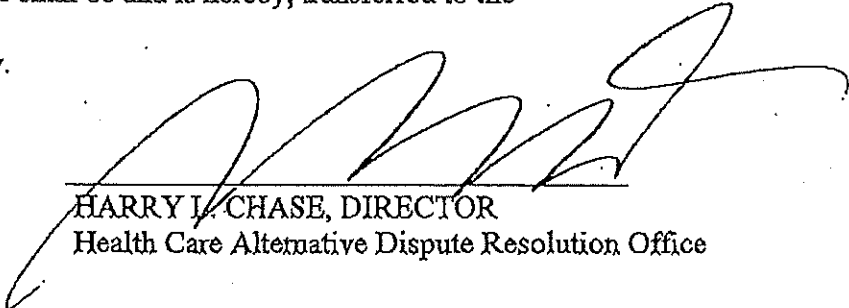
Health Care Providers

* * * * *

ORDER OF TRANSFER

The Claimant, having elected a Waiver of Arbitration under the provisions of the Annotated Code of Maryland, Courts and Judicial Proceedings Article, Section 3-2A-06B it is this 6th Day of December, 2010, by the Health Care Alternative Dispute Resolution Office,

ORDERED that this case shall be and is hereby, transferred to the Circuit Court for Baltimore City.

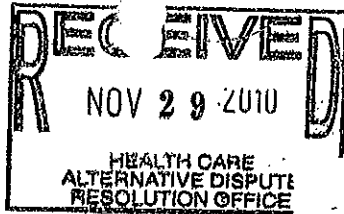

HARRY L. CHASE, DIRECTOR
Health Care Alternative Dispute Resolution Office

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

6B



JAMES BECKETT-UDOM

Claimant

v.

CYRUS J. LAWYER, III, M.D.,
et al

Health Care Providers

* IN THE
* HEALTH CARE
* ALTERNATIVE DISPUTE
* RESOLUTION OFFICE
* HCA No.: 2010-459
*

CERTIFICATE OF QUALIFIED EXPERT AND REPORT

I, Lawrence Borow, M.D., certify that I am board certified in Obstetrics and Gynecology. I am familiar with standards of care in that specialty now and in 1989.

I certify that as a board certified obstetrician and gynecologist, I am and was familiar with the standards of care for obstetrical nurses and nurses involved in the care and treatment of pregnant women in the antepartum period and that I have provided consultation related to their clinical practice. I further certify that obstetrical nursing is a related field of healthcare to that field in which I am board certified.

I certify that less than twenty percent (20%) of my professional activities are devoted to activities that directly involve testimony in personal injury claims.

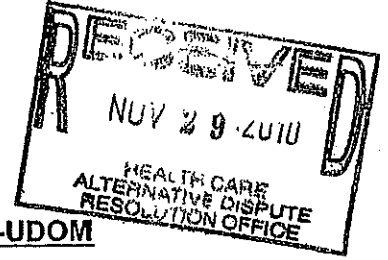
I certify that I reviewed records concerning Jeannette Beckett and James Beckett-Udom from Mercy Medical Center, records concerning Jeannette Beckett from Total Health Care and Cyrus J. Lawyer, M.D. and fetal heart monitor strips.

I certified based upon my training, expertise and review of these materials that the care and treatment rendered to Jeannette Beckett and James Beckett-Udom by Cyrus J. Lawyer, III, M.D., Cyrus J. Lawyer, M.D., P.A., Emerson R. Julian, Jr., M.D.,

Emerson R. Julian, Jr., M.D., P.A. and by known and other unidentifiable employees of Mercy Medical Center, Inc., including nurses, obstetrical nurses, a resident, Dr. Mansfield, Dr. Chong, Dr. T. Adadi, Nurse Magnum and others whose names are unidentifiable, failed to comply with applicable standards of care under the circumstances and that those departures from standards of care directly caused injury to James Beckett-Udom.

A handwritten signature in cursive script that reads "Lawrence Borow". The signature is written in black ink and is positioned above the printed name and address.

Lawrence Borow, M.D.
146 Montgomery Avenue
Suite 200
Bala Cynwyd, PA 19004



REPORT RE JEANNETTE BECKETT AND JAMES BECKETT-UDOM

I have reviewed the records of Mercy Medical Center, records concerning Jeannette Beckett from Total Health Care and Cyrus J. Lawyer, M.D. and fetal heart monitor strips. Based upon my training, expertise and review of these records, the care and treatment rendered to Jeannette Beckett and her unborn and newborn child, James Beckett-Udom failed to comply with the standards of care in the following ways:

1. Failure to properly monitor Ms. Beckett during the pre-birth period, particularly in light of her condition of pregnancy induced hypertension.
2. Failure to direct Ms. Beckett to the hospital on September 5, 1989 for evaluation and monitoring.
3. Failure to properly monitor or ensure proper monitoring at Mercy Medical Center on September 6, 1989.
4. Failure to perform or cause to be performed an earlier delivery by cesarean section of James Beckett-Udom after his mother's presentation to the hospital on September 6, 1989.
5. Failure by the nurses to contact a physician and obtain earlier delivery of James Beckett-Udom.
6. Failure of the house staff and resident staff to obtain or perform an earlier delivery of James Beckett-Udom.
7. And probably in other ways not revealed in the medical records, which will depend upon facts adduced during discovery.

I certify that these violations from standards of care caused injury to James Beckett-Udom with reasonable medical probability, including but not limited to, causing severe

metabolic acidosis and hypoxic injury to his body tissue, including his brain.

Apparently, Jeannette Beckett was a patient of Total Health Care and Dr. Cyrus Lawyer for her prenatal care after becoming pregnant. She was followed in the office by Dr. Lawyer, who was concerned that she was suffering from pregnancy induced hypertension as she approached her due date. As a result, she was prescribed a medication called Aldomet. She was also placed on bed rest.

On August 28, 1989, Ms. Beckett underwent a non-stress test, which revealed a healthy baby. On September 5, 1989, Ms. Beckett was seen in the office by Dr. Lawyer. Among other tests, she had a 2+ albumin in her urine. She was still on Aldomet. Instead of sending her for evaluation to Mercy Medical Center at that time to ensure that the baby was well, Dr. Lawyer apparently advised her to go the next day for a non-stress test.

On September 6, 1989, at approximately noon, Ms. Beckett presented to Mercy Medical Center for a non-stress test. It appears that the fetal heart monitor was started at approximately 12:03 p.m. From the moment it was placed, the fetal heart monitor strip showed concerning signs, including reduced variability, and concerning decelerations. Apparently, after one hour a nipple stimulation test was done and induced significant late decelerations. James Beckett-Udom was not delivered by Dr. Emerson Julian until well after 2:00 p.m. He was born with Apgars of 1 at one minute and 6 at five minutes. His cord blood indicated a base deficit of minus 18.5, indicating severe metabolic acidosis.

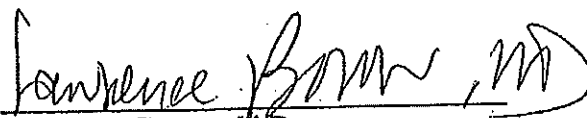
James Beckett-Udom was admitted to Mercy Medical Center's Neonatal Care Unit, where he remained for a month and three weeks. A head ultrasound showed

echogenicity compatible with an intracranial hemorrhage.

James Beckett-Udon now carries a diagnosis of cerebral palsy, mental retardation and developmental delay.

In my opinion, Jeannette Beckett should have been referred to Mercy Medical Center on the evening of September 5, 1989 for evaluation. Had that evaluation been done, she undoubtedly would have been delivered earlier than 2:30 in the afternoon the next day. In addition, when she did present at approximately 12:00 noon on September 6, 1989, her fetal monitoring showed signs suggesting that her unborn baby was sustaining fetal distress, which is confirmed in the medical record. These signs and the fetal heart monitors should have led the nursing staff, the medical student, the resident staff, Dr. Julian, Dr. Lawyer and the other physicians at the hospital to perform a much earlier delivery by cesarean section of James Beckett-Udon. In my opinion this was required by standards of care applicable to all of these health care providers. The failure to deliver James Beckett-Udon earlier in my opinion caused him injury within a reasonable degree of medical probability.

I may need to supplement and amend this Report upon receipt of more information by way of depositions and additional and more legible records.


Lawrence Borow, M.D.

JAMES BECKETT-UDOM

Plaintiff

v.

CYRUS J. LAWYER, III, M.D.

and

CYRUS J. LAWYER, M.D., P.A.

and

EMERSON R. JULIAN, JR., M.D.

and

EMERSON R. JULIAN, JR., M.D., P.A.

and

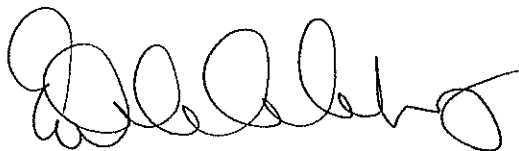
MERCY MEDICAL CENTER, INC.

Defendants

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY
*
* Case No.:
*
*
*

ELECTION FOR JURY TRIAL

Plaintiff, James Beckett-Udom, by his attorneys, E. Dale Adkins, III and Salsbury, Clements, Bekman, Marder & Adkins, L.L.C., hereby elects to have his case tried before a jury.



E. Dale Adkins, III
Salsbury, Clements, Bekman, Marder
& Adkins, L.L.C.
300 W. Pratt Street, Suite 450
Baltimore, Maryland 21201
(410) 539-6633

Attorneys for Plaintiff

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 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: _____

CASE NAME: James Beckett-Udom Plaintiff v Cyrus J. Lawyer, III, M.D. Defendant (Clerk to insert)

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

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

HAS ALTERNATIVE DISPUTE RESOLUTION (ADR): Been Tried? Yes No Requested? Yes No

If yes, specify: _____

Special Requirements? Interpreter/communication impairment Other ADA accommodation:

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 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 RELIEF <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Injunction <input type="checkbox"/> Other _____

TRACK REQUEST

With the exception of Baltimore County, Baltimore City, and Prince George's County, please fill in the estimated LENGTH OF TRIAL. THIS CASE WILL THEN 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 type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time | |

IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE COUNTY, BALTIMORE CITY, OR PRINCE GEORGE'S COUNTY, PLEASE SEE REVERSE SIDE OF FORM FOR INSTRUCTIONS.

Date: 1/19/11 Signature: [Signature]

RECEIVED
CIRCUIT COURT
BALTIMORE CITY
2011 JAN 25 PM 0:05

IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE COUNTY, BALTIMORE CITY, OR PRINCE GEORGE'S 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 seven months from Defendant's response. Includes torts with actual damages up to \$7,500; contract claims up to \$20,000; condemnations; injunctions and declaratory judgment.
- Standard-Medium Trial 12 months from Defendant's response. Includes torts with actual damages over \$7,500 and under \$50,000, and contract claims over \$20,000.
- Standard-Complex Trial 18 months from Defendant's response. Includes complex cases requiring prolonged discovery with actual damages in excess of \$50,000.
- Lead Paint Trial per model order.
- Asbestos Events and deadlines set by individual judge.
- Protracted Cases Complex cases designated by the Administrative Judge.

CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY

- TRACK I Cases having Judicially-assessed values under \$25,000.
- TRACK II Cases having Judicially-assessed values greater than \$25,000 but not complex litigation.
- TRACK III Non-jury.
- TRACK IV Statutory Priority Jury Track.
- TRACK V Complex Litigation (Business, Tort, Orphan's Court Appeals).

LIABILITY FACTORS

- Rear-end
- Slip and Fall
- Intersection
- Changing Lanes
- Left-hand Turn
- Other: _____

INJURY FACTORS

- Soft Tissue
- Broken Bones
- Joint Damages (knee, ankle, etc.)
- Herniated Disk
- Severe Head Injury
- Other: _____

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, Intentional 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.