

STEPHANIE MCMONIGLE, Individually and
as Personal Representative of the Estate of
NICOLETTE MCMONIGLE
21323 Gunpowder Road
Manchester, Maryland 21102

and

RANDY MCMONIGLE
21323 Gunpowder Road
Manchester, Maryland 21102

Plaintiffs,

v.

THE JOHNS HOPKINS HOSPITAL
600 North Wolfe Street
Baltimore, Maryland 21287
Serve on: G. Daniel Shealer, Jr.
733 N. Broadway, Suite 102
Baltimore, Maryland 21205

and

JEANNE S. SHEFFIELD, M.D.
Johns Hopkins Hospital
600 N. Wolfe Street
Phipps 228
Baltimore, Maryland 21287

and

ORLANDO VALLE, M.D.
Johns Hopkins Hospital
1800 Orleans Street
Baltimore, Maryland 21287

and

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

Case No.: 24C1807886

WILLIAM FLETCHER, M.D. *
253 Pleasant Street *
Concord, New Hampshire 03303 *

and *

ROSENE UNICA R.N. *
Johns Hopkins Hospital *
Maternal/fetal Medicine Clinic *
600 North Wolfe Street *
Nelson 2-170 *
Baltimore, Maryland 21287 *

Defendants. *

COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Stephanie McMonigle, Individually and as the Personal Representative of the Estate of Nicolette Elise McMonigle, and Randy McMonigle, by and through their counsel, H. Briggs Bedigian, Jon Stefanuca, and Gilman & Bedigian, LLC, hereby sues the Defendants, Johns Hopkins Hospital, Jeanne Sheffield, M.D., Orlando Valle, M.D., William Fletcher, M.D., and Rosene Unica, R.N. and in support of their causes of action state:

JURISDICTION, VENUE AND PARTIES

1. This medical negligence claim is instituted pursuant to Md. Code Ann., Cts. & Jud. Proc. §§ 3-2A-01 - §3-2A-10, for the recovery of damages in excess of all judiciary and/or legislative jurisdictional amounts. Plaintiffs have previously filed a Statement of Claim, Certificates of Qualified Expert and Reports, and a Notice of Waiver with the Health Care Alternative Dispute Resolution Office. Plaintiffs have also received an Order of Transfer from the Health Care alternative Dispute Resolution Office.

2. Plaintiff, Stephanie McMonigle, is the mother and Personal Representative of Nicolette Elise McMonigle's Estate. Plaintiff, Randy McMonigle is the father of Nicolette

McMonigle. At all relevant times, Decedent, Nicolette Elise McMonigle (hereinafter “Decedent,” “fetus” or “baby”) was a resident of Baltimore City, Maryland. Stephanie and Randy McMonigle are residents of Baltimore City as well.

3. Plaintiffs hereby attach and incorporate by reference the Certificate of Qualified Expert and Report of James Balducci, M.D.

4. Defendant, Johns Hopkins Hospital (hereinafter “JHH”), is and at all relevant times hereto was, a corporation engaged in the administration, staffing, operation, and supervision of a medical center in Baltimore City, Maryland, providing medical care and other services, acting individually and/or through its actual and/or apparent agents, servants and/or employees, including, but not limited to Jeanne Sheffield, M.D., Orlando Valle, M.D., William Fletcher, M.D., and Rosene Unica R.N. (a/k/a Bing or username “runical”).

5. At all relevant times hereto, Jeanne Sheffield, M.D., Orlando Valle, M.D., William Fletcher, M.D., and Nurse Unica acted as actual and/or apparent agents, servants and/or employees of JHH acting without exception within the scope of their agency with JHH. Otherwise, JHH represented these individual Defendants as its actual agents to Ms. McMonigle and the general public such that Ms. McMonigle, like any reasonable person, operated under the assumption that these providers were actual agents of JHH. Hence, JHH is vicariously liable for the actions and/or inactions of these Defendants as alleged in this Complaint under principles of actual and/or apparent agency.

6. Defendant, Jeanne Sheffield, M.D. (hereinafter “Dr. Sheffield”), is and at all times relevant hereto was a physician licensed to practice medicine in Baltimore City, Maryland, including at JHH, acting individually and/or through actual and/or apparent agents, servants and/or employees.

7. Defendant, William Fletcher, M.D. (hereinafter “Dr. Fletcher”), is and at all times relevant hereto was a physician licensed to practice medicine in Baltimore City, Maryland, including at JHH, acting individually and/or through actual and/or apparent agents, servants and/or employees.

8. Defendant, Orlando Valle, M.D. (hereinafter “Dr. Valle”), is and at all times relevant hereto was a physician licensed to practice medicine in Baltimore City, Maryland, including at JHH, acting individually and/or through actual and/or apparent agents, servants and/or employees.

9. Nurse Unica is and at all times relevant hereto was licensed to practice nursing in Baltimore City, Maryland, including at JHH, acting individually and/or through actual and/or apparent agents, servants and/or employees.

10. At all times of which Plaintiffs complain, the above referenced Defendants, through their agents, servants and employees, represented to Plaintiffs and the general public that they possessed the degree of knowledge, ability, and skill possessed by reasonably competent medical practitioners, practicing under the same or similar circumstances as those involving Plaintiffs.

11. The medical care that forms the basis of the Plaintiffs’ Complaint occurred at Johns Hopkins Bayview. Accordingly, Baltimore City, Maryland is the appropriate venue.

FACTS COMMON TO ALL COUNTS

12. Plaintiff, Stephanie McMonigle, was admitted to JHH’s labor and delivery unit on 12/29/15. She was 26 year-old and 31 weeks-pregnant. Her prenatal course was unremarkable. On 12/29/15, however, she reported abdominal pain, nausea, vomiting, elevated blood pressures and swelling of her lower extremities consistent with preeclampsia. Preterm labor was suspected,

but ruled out on physical exam. Ms. McMonigle appeared tearful and anxious. The abdomen was tender in the right lower quadrant and in the suprapubic area.

13. Systematic monitoring began at approximately 8:50 a.m. Initial fetal heart tracing was reassuring with an acceptable fetal heart rate, moderate variability, and no decelerations.

14. The initial presentation included elevated maternal blood pressures, which in conjunction with other symptoms, were consistent with preeclampsia. Preeclampsia is known to cause life-threatening complications, including placental abruptions.

15. By 10:58 a.m., Ms. McMonigle was noted to have suprapubic, right lower quadrant and right flank pain despite Tylenol. The pain was characterized as constant and nagging. However, the fetal heart rate was overall reassuring. An abdominal ultrasound was considered but not performed.

16. At 11:02 a.m., Ms. McMonigle reported lower abdominal pain with cramping. Fetal monitor tracing remained reassuring around the same time. A uterine catheter was inserted at approximately 11:02 a.m., as well.

17. Starting at approximately 11:32 a.m., the nursing staff appears unable to detect a fetal heart rate which prompted monitor adjustments between 11:32 a.m., and 11:46 a.m. The nursing staff did not appear to call a physician during this time frame for assistance and input. At 11:45 a.m., a fetal heart rate was detected by ultrasound, but the fetal monitor continued to pick up the maternal pulse. The fetal heart rate on ultrasound was described as agonal. Finally, at 11:50 a.m., a physician called to check on the fetal heart rate as detected by ultrasound, indicating the physician's awareness that there were problems detecting the fetal heart rate. Within two minutes, Dr. Valle was at bedside. Dr. Fletcher and Dr. Sheffield were at bedside another two minutes later at 11:54 a.m., recognizing the emergency of the situation. Bradycardia

was appreciated and a decision to proceed with an emergency cesarean section was documented at 11:59 a.m.

18. Terbutaline was administered, and Ms. McMonigle was brought to the operating room where general anesthesia was administered. Anesthesia was started at 12:05 p.m., and the incision was made at 12:12 p.m. with the baby being delivered shortly thereafter.

19. During the surgery, notable findings included a couvelaire uterus with prominent generalized ecchymosis consistent with a placental abruption. Intraoperatively, Ms. McMonigle's hemoglobin was noted to be 6.5, requiring one unit of packed red blood cells during the cesarean section. Moreover, the uterus was noted to be completely abrupted with large blood clots removed from the uterine cavity. Subsequent placental pathology revealed a histologically unremarkable placenta and umbilical cord, except for the finding of a significant placental infarct consistent with the placental abruption. The total blood loss during the surgery was estimated at 1700cc. In the interim, Ms. McMonigle's blood pressures deteriorated consistent with severe preeclampsia, and she required magnesium for hemodynamic control.

20. The baby was delivered via cesarean section at approximately 12:12 p.m. Cord blood samples coagulated before testing could be performed. The APGAR score was 0, 2, 3 at 1, 5 and 10 minutes respectively. The baby was noted to be limp, apneic, and cyanotic. There was no heart beat for approximately five minutes after delivery. The baby was transferred to the neonatal intensive care in light of her critical condition. Subsequent radiographic studies of the head revealed parenchymal edema with global ischemia. Additional studies showed little to no brain activity and the baby was diagnosed with as hypoxic ischemic injury.

21. Ms. McMonigle was observed in the labor and delivery unit on 24 hours of postpartum magnesium. Her blood pressures, which were in the severe range, eventually

resolved. In the interim, she received additional blood products. Thereafter, she was transitioned to the postpartum unit without further complications. Unfortunately, her baby girl did not recover and died on 12/30/15 secondary to the placental abruption.

COUNT I (SURVIVAL ACTION)

Plaintiff, Stephanie McMonigle, as the Estate Representative of Decedent, Nicoletta McMonigle, hereby sues the named Defendants and for their cause of action states as follows:

22. Plaintiff incorporates herein by this reference and re-alleges the above paragraphs of this Complaint as if fully stated herein.

23. In their care and treatment of Ms. McMonigle and her baby, the Defendants, acting individually and/or by and/or through their actual and/or apparent agents, servants, and/or employees, including, but not limited to, Jeanne Sheffield, M.D., Orlando Valle, M.D., William Fletcher, M.D, and Nurse Unica, owed Plaintiffs the duty to exercise that degree of care and skill which a reasonably competent physician, nurse practitioner, and/or similar healthcare provider is required to provide under the same or similar circumstances. Specifically, these Defendants, acting by and through their actual and/or apparent agents, had a duty to conduct appropriate and careful examinations of Ms. McMonigle and her baby in order to properly and timely diagnose and treat their condition, including, but not limited to, fetal distress, non-reassuring fetal status, and placental abruption.

24. The applicable standards of care required the Defendants, acting by and through their actual and/or apparent agents, to deliver Nicoletta McMonigle before she sustained permanent and irreversible injuries, which caused her death.

25. Defendants, acting individually and/or by and through their respective actual and/or apparent agents, servants, and/or employees, including, but not limited to, Jeanne

Sheffield, M.D., Orlando Valle, M.D., William Fletcher, M.D, and Nurse Unica breached the applicable standards of care in their treatment of Ms. McMonigle and her baby by, *inter alia*:

- a. failing to properly monitor Ms. Ms. McMonigle's condition and the condition of her baby;
- b. failing to properly document Ms. McMonigle's condition and the condition of her baby ;
- c. failing to timely communicate with other Defendants;
- d. failing to timely execute/implement orders;
- e. failing to timely and correctly interpret important medical information and to convey that information to other Defendants;
- f. failing to intervene to protect Plaintiffs;
- g. failing to perform medical interventions to diagnose fetal distress;
- h. failing to appreciate the presence of fetal distress and placental abruption;
- i. failing to perform medical interventions to alleviate fetal distress;
- j. failing to perform an emergent C-section timely;
- k. failing to appreciate the gravity of Ms. McMonigle's condition and risk factors;
- l. failing to intervene to protect and prevent injury to Nicoletta McMonigle;
- n. failing to timely appreciate and react to the deterioration of Plaintiffs' condition;
- o. negligently exposing Plaintiffs to an unreasonable risk of harm; and
- q. otherwise acting negligently.

23. As a direct and proximate result of the above-mentioned deviations from the applicable standards of care by these Defendants, acting by and through their actual and/or apparent agents, Nicoletta McMonigle has suffered injuries and damages, including, but not limited to:

- a. Neurological damage;
- b. bodily injuries;
- c. Hypoxic ischemic injuries;
- d. Brain damage;
- e. unnecessary medical procedures and other invasive interventions;
- f. Physical and mental pain;
- g. Organ damage, including brain damage;
- h. Brain death;
- i. Disfigurement;
- j. Medical expenses;
- k. Funeral expenses;
- l. Death; and
- m. Other related damages.

WHEREFORE, Plaintiff, Stephanie McMonigle, as the Estate Representative of Nicoletta McMonigle, brings this action against the named Defendants and seeks all permitted compensatory damages, including costs, interest and such other and further relief as may be deemed appropriate. The damages sought are in excess of the required jurisdictional amount.

COUNT II (WRONGFUL DEATH ACTION)

Plaintiffs, Stephanie McMonigle and Randy McMonigle, Individually sue the named Defendants and for their cause of action state as follows:

24. Plaintiffs hereby incorporate by reference each and every allegation contained in the above paragraphs of this Complaint and in all subsequent counts as if fully stated herein.

25. As a direct and proximate result of the alleged negligence as more fully detailed in Count I above and Count III infra, Plaintiffs have suffered and will continue to suffer mental anguish, agony, despair, emotional pain and suffering, loss of society, loss of companionship, comfort, guidance, attention and care, among other injuries and damages recognized under Maryland law in a wrongful death action. The loss of their child, caused and will forever continue to cause severe emotional and mental suffering.

26. The injuries and damages complained of were directly and proximately caused by the negligence and lack of care of the named Defendants, acting jointly and/or individually and/or by and through their agents, servants and employees, including but not limited to, Jeanne Sheffield, M.D., Orlando Valle, M.D., William Fletcher, M.D, and Nurse Unika.

WHEREFORE, Plaintiff, Stephanie McMonigle and Randy McMonigle, Individually, bring this action against the named Defendants and seek all permitted compensatory damages, including costs, interest and such other and further relief as may be deemed appropriate. The damages sought are in excess of the required jurisdictional amount.

COUNT III (INFORMED CONSENT)

Plaintiff, Stephanie McMonigle, Individually and as the Estate Representative of Nicoletta McMonigle, hereby sues the named Defendant Defendants and for cause of action states as follows:

29. Plaintiff hereby incorporates by reference each and every allegation contained in the above paragraphs of this Complaint.

30. The named Defendants, acting individually and/or by and/or through their respective actual and/or apparent agents, servants, and/or employees as alleged in Count I, owed Plaintiffs the duty to appropriately inform Ms. McMonigle about the nature of her medical condition and the condition of her baby *in utero*, the proposed treatments/monitoring for such conditions, the indications for the proposed treatment/monitoring, the risks and benefits of the proposed treatment/monitoring, and the alternatives to the proposed treatment and monitoring.

31. The named Defendants, acting by and through their actual and/or apparent agents, servants, and/or employees as alleged in Count I, failed to adequately and appropriately obtain Ms. McMonigle's informed consent for the treatment plan adopted and implemented by them.

29. Had the named Defendants, acting by and through their actual and/or apparent agents, fully and timely informed Ms. McMonigle of the non-reassuring fetal monitoring tracings, the possibility of a placental abruption, signs and symptoms of fetal distress and the risk of neurological injury and/or death if an expedited delivery was not performed, Ms. McMonigle, like any reasonable person, would have chosen to undergo an emergency C-section without delay. However, the named Defendants did not make these disclosures.

31. As a direct and proximate result of the negligent and careless acts and omissions of the named Defendants as alleged in Count I and as a result of their failure to obtain Ms. McMonigle's informed consent, Plaintiffs suffered and will continue to suffer the injuries and damages more fully set forth in Count I and II above.

WHEREFORE, Plaintiff, Stephanie McMonigle, Individually and as the Estate Representative of Nicoletta McMonigle, brings this action against the named Defendants and

seeks all permitted compensatory damages, including costs, interest and such other and further relief as may be deemed appropriate. The damages sought are in excess of the required jurisdictional amount.

Respectfully submitted,


GIEMAN & BEDIGIAN, LLC

H. Briggs Bedigian
Jon S. Stefanuca
1954 Greenspring Drive, Suite 250
Timonium, Maryland 21093
410 560-4999
Counsel for Plaintiffs

JURY TRIAL DEMAND

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


H. Briggs Bedigian

IN THE 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).

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** _____

CASE NAME: Stephanie McMonigle, et al. vs. The Johns Hopkins Hospital, et al.
Plaintiff Defendant (Clerk to insert)

PARTY'S NAME: Stephanie McMonigle

PARTY'S ADDRESS: 21323 Gunpowder Rd, Manchester, MD **PHONE:** 443 373-1694
(Daytime phone)

PARTY'S E-MAIL: stephaniemcmonigle@gmail.com

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: H. Briggs Bedigian **PHONE:** 410 560-4999

PARTY'S ATTORNEY'S ADDRESS: 1954 Greenspring Drive, Suite 250

PARTY'S ATTORNEY'S E-MAIL: hbb@gblegalteam.com

JURY DEMAND? Yes No

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

ANTICIPATED LENGTH OF TRIAL: _____ hours or 8 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"/> Asbestos <input type="checkbox"/> Assault and Battery <input type="checkbox"/> Business and Commercial <input type="checkbox"/> Conspiracy <input type="checkbox"/> Conversion <input type="checkbox"/> Defamation <input type="checkbox"/> False Arrest/Imprisonment <input type="checkbox"/> Fraud <input type="checkbox"/> Lead Paint - DOB of Youngest Plt: _____ <input type="checkbox"/> Loss of Consortium <input type="checkbox"/> Malicious Prosecution <input checked="" type="checkbox"/> Malpractice-Medical <input type="checkbox"/> Malpractice-Professional <input type="checkbox"/> Misrepresentation <input type="checkbox"/> Motor Tort <input type="checkbox"/> Negligence <input type="checkbox"/> Nuisance <input type="checkbox"/> Premises Liability <input type="checkbox"/> Product Liability <input type="checkbox"/> Specific Performance <input type="checkbox"/> Toxic Tort <input type="checkbox"/> Trespass <input type="checkbox"/> Wrongful Death	<input type="checkbox"/> Government <input type="checkbox"/> Insurance <input type="checkbox"/> Product Liability PROPERTY <input type="checkbox"/> Adverse Possession <input type="checkbox"/> Breach of Lease <input type="checkbox"/> Detinue <input type="checkbox"/> Distress/Distrain <input type="checkbox"/> Ejectment <input type="checkbox"/> Forcible Entry/Detainer <input type="checkbox"/> Foreclosure <input type="checkbox"/> Commercial <input type="checkbox"/> Residential <input type="checkbox"/> Currency or Vehicle <input type="checkbox"/> Deed of Trust <input type="checkbox"/> Land Installments <input type="checkbox"/> Lien <input type="checkbox"/> Mortgage <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Statement Condo <input type="checkbox"/> Forfeiture of Property / Personal Item <input type="checkbox"/> Fraudulent Conveyance <input type="checkbox"/> Landlord-Tenant <input type="checkbox"/> Lis Pendens <input type="checkbox"/> Mechanic's Lien <input type="checkbox"/> Ownership <input type="checkbox"/> Partition/Sale in Lieu <input type="checkbox"/> Quiet Title <input type="checkbox"/> Rent Escrow <input type="checkbox"/> Return of Seized Property <input type="checkbox"/> Right of Redemption <input type="checkbox"/> Tenant Holding Over	PUBLIC LAW <input type="checkbox"/> Attorney Grievance <input type="checkbox"/> Bond Forfeiture Remission <input type="checkbox"/> Civil Rights <input type="checkbox"/> County/Mncpl Code/Ord <input type="checkbox"/> Election Law <input type="checkbox"/> Eminent Domain/Condemn. <input type="checkbox"/> Environment <input type="checkbox"/> Error Coram Nobis <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Mandamus <input type="checkbox"/> Prisoner Rights <input type="checkbox"/> Public Info. Act Records <input type="checkbox"/> Quarantine/Isolation <input type="checkbox"/> Writ of Certiorari EMPLOYMENT <input type="checkbox"/> ADA <input type="checkbox"/> Conspiracy <input type="checkbox"/> EEO/HR <input type="checkbox"/> FLSA <input type="checkbox"/> FMLA <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Wrongful Termination INDEPENDENT PROCEEDINGS <input type="checkbox"/> Assumption of Jurisdiction <input type="checkbox"/> Authorized Sale <input type="checkbox"/> Attorney Appointment <input type="checkbox"/> Body Attachment Issuance <input type="checkbox"/> Commission Issuance	<input type="checkbox"/> Constructive Trust <input type="checkbox"/> Contempt <input type="checkbox"/> Deposition Notice <input type="checkbox"/> Dist Ct Mtn Appeal <input type="checkbox"/> Financial <input type="checkbox"/> Grand Jury/Petit Jury <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Perpetuate Testimony/Evidence <input type="checkbox"/> Prod. of Documents Req. <input type="checkbox"/> Receivership <input type="checkbox"/> Sentence Transfer <input type="checkbox"/> Set Aside Deed <input type="checkbox"/> Special Adm. - Atty <input type="checkbox"/> Subpoena Issue/Quash <input type="checkbox"/> Trust Established <input type="checkbox"/> Trustee Substitution/Removal <input type="checkbox"/> Witness Appearance-Compel PEACE ORDER <input type="checkbox"/> Peace Order EQUITY <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Equitable Relief <input type="checkbox"/> Injunctive Relief <input type="checkbox"/> Mandamus OTHER <input type="checkbox"/> Accounting <input type="checkbox"/> Friendly Suit <input type="checkbox"/> Grantor in Possession <input type="checkbox"/> Maryland Insurance Administration <input type="checkbox"/> Miscellaneous <input type="checkbox"/> Specific Transaction <input type="checkbox"/> Structured Settlements
---	--	---	--

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

- 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

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.

- Expedited- Trial within 7 months of Defendant's response 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.

4/27/2018

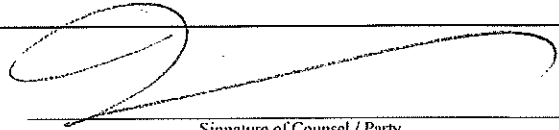
Date

1954 Greenspring Drive, Suite 250

Address

Timonium, Maryland 21093

City, State, Zip



Signature of Counsel / Party

H. Briggs Bedigian

Printed Name