CARRIE HERZOG	*
801 Lida Place Bel Air, Maryland 21014	*
Plaintiff	*
v.	*
THE JOHNS HOPKINS HEALTH SYSTEM CORPORATION	*
600 N. Wolfe Street	*
Baltimore, Maryland 21287-1900 <u>SERVE ON:</u> G. Daniel Shealer, Jr.	*
733 North Broadway – Suite 102 Baltimore, Maryland 21205	*
and	*
	*
THE JOHNS HOPKINS HOSPITAL, INC., d/b/a THE JOHNS HOPKINS HOSPITAL 600 N. Wolfe Street	*
Baltimore, Maryland 21287-1900 SERVE ON:	*
G. Daniel Shealer, Jr.	*
733 North Broadway – Suite 102 Baltimore, Maryland 21205	*
and	*
THE JOHNS HOPKINS HOSPTIAL 600 N. Wolfe Street	*
Baltimore, Maryland 21287-1900 SERVE ON:	* '
G. Daniel Shealer, Jr.	*
733 North Broadway – Suite 102 Baltimore, Maryland 21205	*
and	*
JOHNS HOPKINS COMMUNITY PHYSICIANS, INC.	*
733 North Broadway – BRB 102	*
Baltimore, Maryland 21205  SERVE ON: G. Daniel Shealer, Jr.	*

IN THE

FOR

CIRCUIT COURT

BALTIMORE CITY

Case No. 240/6/04/19-

733 North Broadway – Suite 102	*
Baltimore, Maryland 21205	*
and	*
JOHNS HOPKINS HEALTH CARE AND	
SURGERY DEVELOPMENT, LLC	*
Johns Hopkins Medical Management	*
Corporation	ጥ
2330 W. Joppa Road – Suite 301 Lutherville, Maryland 21093	*
SERVE ON:	•
G. Daniel Shealer, Jr.	*
733 North Broadway – Suite 102	
Baltimore, Maryland 21205	*
and	*
and	
HOWARD A. ZACUR, M.D., Ph.D.	*
10753 Falls Road	을 하는 것이 없는 것이었다면서 없어요. 그런 것이 없는 것이 없는 것이 없는 것이 없는 것이었다면서 없는 것이 없는 것이었다면서 없어요. 그런 것이 없는 것이 없는 것이었다면서 없어요. 그런 것이 없는 것이 없어요. 그런 것이 없어요.
Lutherville-Timonium, Maryland 21093	*
Defendants	*
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## COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff, Carrie Herzog, by her undersigned counsel, hereby files this Complaint and Demand for Jury Trial against the Defendants, Johns Hopkins Health System Corporation, The Johns Hopkins Hospital, Inc., d/b/a The Johns Hopkins Hospital, The Johns Hopkins Hospital, Johns Hopkins Community Physicians, Inc., Johns Hopkins Health Care and Surgery Development, LLC, and Howard A. Zacur, M.D., Ph.D. (collectively, "Defendants"). In support of her Complaint, Plaintiff avers as follows:

1. Venue as to all claims is invoked in Baltimore City pursuant to MD. CODE ANN., CTS. & JUD. PROC. § 6-201, et seq., inasmuch as (a) all Defendants reside, carry on a regular business, are employed and/or habitually engage in a vocation in Baltimore City; and/or (b) the

cause of action arose in Baltimore City, in that the injuries proximately caused by the alleged negligence of the Defendants occurred at Johns Hopkins Hospital, Inc., d/b/a The Johns Hopkins Hospital located in Baltimore City, Maryland. Furthermore, all the Defendants, Johns Hopkins Health System Corporation, The Johns Hopkins Hospital, Inc., d/b/a The Johns Hopkins Hospital, The Johns Hopkins Hospital, Johns Hopkins Community Physicians, Inc., Johns Hopkins Health Care and Surgery Development, LLC, and Howard A. Zacur, M.D., Ph.D, carry on a regular business, are employed and/or habitually engage in a vocation in Baltimore City. Additionally, the cause of action arose in Baltimore City, in that the irreversible injuries proximately caused by the alleged negligence of the Defendants occurred at Johns Hopkins Hospital, Inc., d/b/a The Johns Hopkins Hospital, located in Baltimore City, Maryland.

- 2. Jurisdiction is proper in Baltimore City Circuit Court in that all conditions precedent to filing this suit have been met. This case was initially filed in the Health Care Alternative Dispute Resolution Office of Maryland as Carrie Herzog v. The Johns Hopkins Health System Corporation, The Johns Hopkins Hospital, Inc., d/b/a The John Hopkins Hospital, The Johns Hopkins Hospital, Johns Hopkins Community Physicians, Inc., Johns Hopkins Health Care and Surgery Development, LLC and Howard A. Zacur, M.D., Ph.D., Case No.: 2018-140, along with an Election to Waive Arbitration, and the Certificate of Qualified Expert and Report of Steven D. McCarus, M.D., copies of which are collectively attached hereto as Exhibit A and the Order of Transfer is attached hereto as Exhibit B.
- 3. Damages are in excess of the required jurisdictional amount under MD. CODE, CTS. & JUD. PROC. § 3-2A-02.
  - 4. The amount of this claim exceeds \$30,000.00.

- 5. The venue of this claim is proper in Baltimore City, Maryland, the venue in which all relevant events occurred, including the medical care at issue, and the venue in which all Defendants customarily, routinely, and habitually engage in their business of providing medical services to the public, and the venue in which the disabled Plaintiff, Carrie Herzog (hereinafter, Ms. Herzog), sustained her severe injuries.
- 6. The Defendants at issue are The Johns Hopkins Health System Corporation, The Johns Hopkins Hospital, Inc. d/b/a The Johns Hopkins Hospital, The Johns Hopkins Hospital, Johns Hopkins Community Physicians, Inc., Johns Hopkins Health Care and Surgery Development, LLC and Howard A. Zacur, M.D., Ph.D.
- 7. This claim arises from substandard and otherwise negligent medical care provided by Defendants to Ms. Herzog, on or about February 3, 2016.
- 8. At all times pertinent hereto, Defendant The Johns Hopkins Health System Corporation, a professional services corporation organized under the laws of the State of Maryland, with its principal place of business in Baltimore City, Maryland, held itself out to the public as competent to provide medical, surgical and nursing services, and indeed did provide such care and services to Ms. Herzog, directly and by and through its principals, and/or actual and/or apparent agents, servants and/or employees, who at all times acted within the scope of their authority in providing care to Plaintiff.
- 9. At all times pertinent hereto, Defendant The Johns Hopkins Hospital, Inc. d/b/a The Johns Hopkins Hospital, a professional services corporation organized under the laws of the State of Maryland, with its principal place of business in Baltimore City, Maryland, held itself out to the public as competent to provide medical, surgical and nursing services, and indeed did provide such care and services to Ms. Herzog, directly and by and through its principals, and/or actual and/or

apparent agents, servants and/or employees, who at all times acted within the scope of their authority in providing care to Plaintiff.

- 10. At all times pertinent hereto, Defendant The Johns Hopkins Hospital, a professional services corporation organized under the laws of the State of Maryland, with its principal place of business in Baltimore City, Maryland, held itself out to the public as competent to provide medical, surgical and nursing services, and indeed did provide such care and services to Ms. Herzog, directly and by and through its principals, and/or actual and/or apparent agents, servants and/or employees, who at all times acted within the scope of their authority in providing care to Plaintiff.
- 11. At all times pertinent hereto, Defendant Johns Hopkins Community Physicians, Inc., a professional services corporation organized under the laws of the State of Maryland, with its principal place of business in Baltimore City, Maryland, held itself out to the public as competent to provide medical, surgical and nursing services, and indeed did provide such care and services to Ms. Herzog, directly and by and through its principals, and/or actual and/or apparent agents, servants and/or employees, who at all times acted within the scope of their authority in providing care to Plaintiff.
- 12. At all times pertinent hereto, Defendant Johns Hopkins Health Care and Surgery Development, LLC, a professional services corporation organized under the laws of the State of Maryland, with its principal place of business in Baltimore City, Maryland, held itself out to the public as competent to provide medical, surgical and nursing services, and indeed did provide such care and services to Ms. Herzog, directly and by and through its principals, and/or actual and/or apparent agents, servants and/or employees, who at all times acted within the scope of their authority in providing care to Plaintiff.

- 13. At all times pertinent hereto, Defendant Howard A. Zacur, M.D., Ph.D., (hereinafter, "Dr. Zacur"), was licensed to practice medicine in the State of Maryland, and held himself out to the public as a competent practitioner of gynecologic oncology. At all times relevant in rendering care to Ms. Herzog, Dr. Zacur was employed in, and habitually carried on a vocation in Baltimore, Maryland.
- 14. At all times pertinent hereto, Dr. Zucar acted individually, and as the actual and/or apparent agent, servant and/or employee of The Johns Hopkins Health System Corporation, The Johns Hopkins Hospital, Inc. d/b/a The Johns Hopkins Hospital, The Johns Hopkins Hospital, Johns Hopkins Community Physicians, Inc., and Johns Hopkins Health Care and Surgery Development, LLC, and did so within the scope of his employment and authority.
- 15. At all times relevant hereto, each of the Defendants, including their principals, and/or actual and/or apparent agents, servants and/or employees acted as the actual and/or apparent agents, servants and/or employees of each other.
- 16. At all times pertinent hereto, Ms. Herzog was a patient of the above Defendants for the purpose of receiving health care and treatment.
- 17. An appropriate Certificate of Merit and Report signed by an expert in the medical specialty of gynecology in support of Plaintiff's claims is attached hereto and incorporated herewith, collectively, as Plaintiff's **Exhibit A**.
- 18. At all times relevant hereto Defendants agreed to provide to Ms. Herzog appropriate care and treatment for, including but not limited to the following: menorrhagia, dysmenorrhea, pelvic pain, ovarian cyst, endometriosis, among others.
- 19. At all times relevant hereto Defendants agreed to provide to Ms. Herzog appropriate surgical care and treatment for, including but not limited to a laparoscopy, hysteroscopy, D & C,

ovarian cystectomy and all post-surgical care, monitoring, evaluation, assessment, diagnosis, and treatment subsequent to Ms. Herzog's surgery.

- 20. Accordingly, Defendants owed a duty to Ms. Herzog to exercise the degree of skill and care expected of reasonably competent health care providers performing laparoscopic evaluation of the peritoneal cavity, diagnostic laparoscopy with chromopertubation, hysteroscopy with dilation and curettage of uterus, and ovarian cystectomy and for all related post-surgical care, monitoring, evaluation, assessment, and treatment in the same or similar circumstances.
- 21. On February 3, 2016, Ms. Herzog, presented to Defendants for surgical procedures under general anesthesia for a total laparoscopic ovarian cystectomy, hysteroscopy, D & C, chromopertubation and adhesion lysis, and for all related surgical and post-surgical care, monitoring, evaluation, assessment, and treatment.
- 22. The operating time was one hour and fifteen minutes. Ms. Herzog was discharged the same day as her surgery, February 3, 2016, and provided with discharge instructions, including scheduling a post-surgical appointment with Dr. Zacur in two (2) to four (4) weeks;
- 23. During surgery, Dr. Zacur "initially" inserted the umbilical trocar preperitoneally. Thereafter, there was a small amount of bleeding, but according to Dr. Zacur's surgical report, this was later shown not to have been active and to have stopped.
- 24. He further noted that the endometrioma present in the left ovary was opened during the lysis of adhesions and the dissection of the ovary from the pelvic sidewall with endoshears.
- 25. The operative report also states that there was methylene blue dye spill with chromopertubation. "Bleeding was controlled with the use of bipolar cautery." The endometriosis implants near the right uterosacral ligament were cauterized with bipolar after the ureter had been identified and found to be away from the site. The operative report also states there was no

evidence of bleeding at the end of the procedure. Following the procedure, the pelvis was again irrigated. C02 gas was expelled. Trocars were removed under direct vision. Other than the appendix, at no time was inspection of the large or small bowel mentioned.

- 26. Throughout the days following her surgical day, Ms. Herzog displayed a variety of very concerning abdominal clinical signs and symptoms.
- 27. Ms. Herzog had worsening pelvic pain, fatigue, nausea, vomiting, poor appetite, and the fact that she had become confused and disoriented, three days following surgery, on February 7, 2016, Diane Herzog, her mother, took her immediately to University of Maryland Upper Chesapeake Medical Center Emergency Department.
- 28. Ms. Herzog's CT scan at Upper Chesapeake Health Center indicated pneumonia and bowel injury, more specifically pneumoperitoneoum with mild ascites and mesenteric edema. Multiple loculated collections of fluid and gas about the right lobe of the liver and in the right lower quadrant with additional loculated fluid collections in the pelvis. Findings are more extensive than expected for typical postsurgical changes and raise the concern for possible bowel perforation. Circumstantial thickening of the proximal to mid-transverse colon. Small bilateral pleureal effusions with overlying atelectasis, larger on the right side with consolidative changes in the right lower lobe compatible with bronchopneumonia.
- 29. Throughout the day at Upper Chesapeake Health Center, Ms. Herzog became increasingly tachycardic, short of breath, and continued with abdominal pain.
- 30. Ms. Herzog was transported back to Johns Hopkins Hospital and readmitted on February 7, 2007 with sepsis, suspected bowel injury and multiple abdominal collections.
- 31. On post-op day five, February 8, 2016, Ms. Herzog underwent additional surgical procedures including, but not limited to diagnostic laparotomy, repair of small bowel injury, lysis

of adhesions, abdominal washout, and JP drain replacement. Intraoperative findings were significant for extensive adhesions, purulent fluid throughout the abdominal cavity. A 2 mm injury in the distal jejunum close to the mesenteric edge with associated eschar and purulent material that was tracking up into the right upper quadrant. The bowel was otherwise healthy-appearing with no evidence of ischemia or necrosis, therefore, resection was not required.

32. Ms. Herzog was required to be re-hospitalized at Johns Hopkins Hospital for an additional six days, during *inter alia*: she experienced extreme pain and suffering, and underwent an additional invasive surgery, was in respiratory distress, intubated, treated for pneumonia, sustained blood loss, required IV antibiotics for intra-abdominal infection, had initial tachycardia and hypotension, gastrointestinal issues, was caused to undergo physical therapy, was diagnosed with a staph infection, caused to have contact precautions and was referred to a home care coordinator to initiate IV infusion services for antibiotic therapy, all secondary to the negligence of Defendants.

# COUNT I (NEGLIGENCE—MEDICAL MALPRACTICE)

- 33. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 32 of this Complaint, as if each allegation was fully set forth herein, incorporates each preceding allegation by reference, and further allege as follows:
- 34. Defendants, including Dr. Zacur, had a duty to provide Ms. Herzog with care in accord with the applicable standards of care and to consistently and properly and timely assess, diagnose, monitor, evaluate, care for, and treat Ms. Herzog during and following her D & C, hysteroscopy and laparoscopic ovarian cystectomy;

- 35. In breach of that duty and the applicable standards of care, the Defendants, including, but not limited to Dr. Zacur, negligently failed to properly and consistently and timely diagnose, evaluate, assess, monitor, care for and treat Ms. Herzog.
- 36. The incidents of medical care provided by the Defendant, including Dr. Zacur to Ms. Herzog, which breached the applicable standards of care included, but were not limited to, the following:
- a. Failure to properly identify Ms. Herzog's anatomy during the surgical procedure and avoid perforating her bowel;
- b. Failure to identify, recognize, and/or discover that Ms. Herzog's bowel had been perforated during the surgical procedure;
- c. Failure to identify, recognize, and/or discover that Ms. Herzog's abdominal pain and other symptoms were being caused by the perforation of her bowel before she was discharged from the hospital;
- d. Failure to adequately instruct Ms. Herzog when to return to the hospital for further assessment, evaluation and examination following her surgery on February 3, 2016;
  - e. Failure to conduct appropriate and timely examinations;
- h. Failure to utilize appropriate and ancillary procedures during entrance into Ms. Herzog's peritoneal cavity;
- i. Failure to recognize the increased risks of bowel perforation under circumstances similar as those present in Ms. Herzog;
  - j. Failure to timely and adequately diagnose and treat Ms. Herzog's condition;
- k. Failure to appropriately and timely react to symptoms, signs and findings which were illustrative of Ms. Herzog's true condition;

- l. Failure to take appropriate and timely precautions in monitoring and treating Ms. Herzog's condition;
- m. Failure to obtain appropriate consultations and/or appropriately utilize the information made available to them;
  - n. Failure to properly and timely monitor and respond to Ms. Herzog's true condition;
- o. Failure to take appropriate precautions in monitoring and treating Ms. Herzog's condition;
- p. Failure to timely and appropriately diagnose and treat Ms. Herzog's perforated bowel and sepsis;
- q. Failure to timely order appropriate intervention to prevent Ms. Herzog's resulting injuries;
  - r. Failure to timely, adequately, and appropriately place surgical equipment;
- s. Failure to timely, adequately, and appropriately identify and diagnose the injury caused to Ms. Herzog;
- t. Failure to timely, adequately, and appropriately respond to and treat the injury suffered by Ms. Herzog;
- u. Failure to timely, adequately and appropriately order, perform, and evaluate diagnostic testing for Ms. Herzog, and;
- v. The Defendants were otherwise negligent and in violation of the applicable standards of care in the course of their attempt to properly and timely evaluate, assess, diagnose, monitor, care for, and treat Ms. Herzog during, and following, her surgery, such that may become apparent during the course of discovery.

37. As a direct and proximate result of the Defendants' negligence, including the above mentioned negligence of Defendants, both directly and as agents, representatives, and/or employees of one another, as well as jointly and severally and without any negligence on the part of Ms. Herzog contributing thereto, Ms. Herzog was directly and proximately caused to (a) suffer severe and painful injuries and their sequelae; (b) undergo painful procedures; (c) suffer from fear, anxiety, and depression; (d) incur the need for additional past and future medical treatment and expenses; and to (e) suffer loss of earning capacity and loss of enjoyment and quality of life.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and severally, for compensatory damages in an amount in excess of applicable jurisdictional limits for Plaintiff's injuries and losses, plus interest and costs of this action, and any other appropriate relief.

## DEMAND FOR JURY TRIAL

Plaintiff, Carrie Herzog, by her undersigned counsel, hereby elects to have this case tried by a jury.

Respectfully submitted,

Giles H. Manley, M.D., J.D.
JANET, JANET & SUGGS, LLC

4 Reservoir Circle, Suite 200 Baltimore, Maryland 21208

Telephone: 410-653-3200 Facsimile: 410-653-9030

Attorneys for Plaintiff

**CARRIE HERZOG** 

Claimant

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\* IN THE

\* HEALTH CARE

\* ALTERNATIVE DISPUTE

\* RESOLUTION OFFICE

THE JOHNS HOPKINS HEALTH SYSTEM CORPORATION, etc., et al.

Health Care Providers

HCADRO No.:

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# MAR 2 8 2018 HEALTH CARE ALTERNATIVE DISPUTE BESOLUTION OFFICE

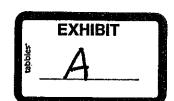
# ELECTION TO WAIVE ARBITRATION

Claimant, Carrie Herzog, by and through her undersigned counsel, Giles H. Manley, and Janet, Jenner & Suggs, LLC, pursuant to MD. CTs. & JUD. PROC. CODE ANN., § 3-2A-06A, hereby waive the arbitration of the above-captioned claim.

Respectfully submitted,

Giles H. Manley, M.D., J.D. Janet, Jenner & Suggs, LLC 4 Reservoir Circle, Suite 200 Baltimore, Maryland 21208 (410) 653-3200

Attorneys for Claimants



CARRIE HERZOG 801 Lida Place	*
Bel Air, MD 21014	₩.
Claimant	*
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THE JOHNS HOPKINS HEALTH SYSTEM CORPORATION	*
600 N. Wolfe Street Baltimore, MD 21287-1900	*
SERVE ON: Joanne E. Pollack, Esquire	<b>#</b> .
Resident Agent 600 N. Wolfe Street	*
Administration 414 Baltimore, MD 21205	*
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THE JOHNS HOPKINS HOSPITAL, INC., d/b/a THE JOHNS HOPKINS HOSPITAL 600 N. Wolfe Street	*
Baltimore, MD 21287-1900 SERVE ON:	*
Joanne E. Pollak, Esquire Legal Department, Admin. 400	*
Resident Agent 600 N. Wolfe Street Baltimore, MD 21287-1900	*
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THE JOHNS HOPKINS HOSPITAL 600 N. Wolfe Street Baltimore, MD 21287-1900	*

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IN THE HEALTH CARE

ALTERNATIVE DISPUTE

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HCADRO No.: 2018-140

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Charles & 34th Streets	*
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113 Garland Hall	
3400 N. Charles Street	*
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JOHNS HOPKINS COMMUNITY	
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Community Physicians	
733 N. Broadway, BRB 102	4
Baltimore, MD 21205	
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HOWARD A. ZACUR, M.D., Ph.D. 2330 W. Joppa Road, Suite 301	•
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### CERTIFICATE OF MERIT

- I, Steven D. McCarus, M.D., am a licensed physician in Florida. I am board-1 certified in Obstetrics and Gynecology, the same specialty in which Health Care Provider, Howard Zacur, is board-certified and in which Health Care Providers The Johns Hopkins Health System Corporation, The Johns Hopkins Hospital, Inc. d/b/a The Johns Hopkins Hospital, The Johns Hopkins University and Johns Hopkins Community Physicians, Inc. and/or Johns Hopkins Community Physicians directly and/or by and through its actual and/or apparent agents, servants, and/or employees, including Howard Zacur, M.D., were engaged that gave rise to this claim. Health Care Providers The Johns Hopkins Health System Corporation, The Johns Hopkins Hospital, Inc. d/b/a The Johns Hopkins Hospital, The Johns Hopkins University and Johns Hopkins Community Physicians, Inc. and/or Johns Hopkins Community Physicians directly and/or by and through its actual and/or apparent agents, servants, and/or employees, including, but not limited to, Howard Zacur, M.D., are hereinafter referred to collectively as Health Care Providers. I have training and experience in evaluating patients prior to, and the performance of, laparoscopic and hysteroscopic surgeries, including, but not limited to, dilation and curettage of the uterus, hysteroscopy, laparoscopy, ovarian cystectomies and lysis of adhesions. I also have training and experience in the evaluation of surgical and post-operative complications and/or injuries related to perforation of the small bowel, the same area of practice as the Health Care Providers in this claim.
- 2. I am board-certified in Obstetrics and Gynecology and I have clinical experience and have provided consultation, and training relating to clinical practice in the areas of Gynecology, endometriosis and ovarian cysts, the Health Care Providers' specialty, within five years of the date of the acts and/or omissions giving rise to this cause of action. I also have clinical experience rendering gynecologic related health care in hospital and office settings and am familiar

with the rendering of gynecologic related health care under the auspices of medical and hospital corporate structures, the same as Health Care Providers were engaged, within five years of the date of the acts and omissions giving rise to this cause of action.

Based upon my education, training and experience, and my review of the pertinent 3. medical records from Johns Hopkins and Upper Chesapeake Hospitals pertaining to this claim, it is my opinion to a reasonable degree of medical probability that the care and treatment of Ms. Carrie Herzog rendered by Health Care Provider Howard Zacur, M.D., individually, and The Johns Hopkins Health System Corporation, The Johns Hopkins Hospital, Inc. d/b/a The Johns Hopkins Hospital, The Johns Hopkins University and Johns Hopkins Community Physicians, Inc. and/or Johns Hopkins Community Physicians directly and/or by and through its actual and/or apparent agents, servants, and/or employees, including, but not limited to, Howard Zacur, M.D., which is the subject of this action, breached the standard of care applicable to health professionals and organizations of like kind with similar training and experience situated in the same or similar circumstances. It is my opinion that Health Care Providers breached the standard of care applicable to them by improperly perforating the distal jejunum during the February 3, 2016 surgery. Second, Health Care Providers breached the standard of care applicable to them by failing to diagnose intraoperatively that the bowel was perforated. Third, additionally, it is my opinion to a reasonable degree of medical probability that these breaches in the standard of care directly and proximately caused Ms. Herzog to suffer severe and permanent injuries including, but not limited to, pain, suffering and emotional distress. I hold these opinions to a reasonable degree of medical probability.

- 4. Attached is a brief report of my opinion. I reserve the right to alter, amend, modify, expand upon or to otherwise revise my opinions as discovery progresses and new or additional information becomes available to me.
- 5. I do not devote more than 20% annually of my professional activities to activities that directly involve testimony in personal injury claims.
- 6. I am not a party to this litigation. I am not an employee or partner of any party to this litigation and I am not an employee or stockholder of any professional corporation of which any party is a stockholder.

7. I hereby certify and affirm that the above is accurate and true and correct to the best of my ability and based upon my personal knowledge.

Stevel Davicearus, M.D.

IN THE HEALTH CARE

ALTERNATIVE DISPUTE

2018-140

RESOLUTION OFFICE

HCADRO No.:

CARRIE HERZOG 801 Lida Place Bel Air, MD 21014 Claimant ۷, THE JOHNS HOPKINS HEALTH SYSTEM CORPORATION 600 N. Wolfe Street Baltimore, MD 21287-1900 SERVE ON: Jonne E. Pollack, Esquire Resident Agent 600 N. Wolfe Street Administration 414 Baltimore, MD 21205 and THE JOHNS HOPKINS HOSPITAL, INC., d/b/a THE JOHNS HOPKINS HOSPITAL 600 N. Wolfe Street Baltimore, MD 21287-1900 SERVE ON: Joanne E. Pollak, Esquire Legal Department, Admin. 400 Resident Agent 600 N. Wolfe Street Baltimore, MD 21287-1900 and

THE JOHNS HOPKINS HOSPITAL

600 N. Wolfe Street

Baltimore, MD 21287-1900

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SERVE ON: G. Daniel Shealer, Jr.	o <sub>p</sub>
The Johns Hopkins Hospital Resident Agent	ý
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THE JOHNS HOPKINS UNIVERSITY Charles & 34th Streets	¥
Baltimore, MD 21218 SERVE ON:	÷
Arthur P. Pineau, Interim General Counsel Resident Agent	钟
113 Garland Hall 3400 N. Charles Street	¥
Baltimore, MD 21218	*
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JOHNS HOPKINS COMMUNITY PHYSICIANS, INC., a/k/a Johns Hopkins	华
Community Physicians 733 N. Broadway, BRB 102	*
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Joanne E. Pollack, Esquire, Resident Agent Johns Hopkins Health System Corporation 733 N. Broadway, BRB 102	÷
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HOWARD A. ZACUR, M.D., Ph.D. 2330 W. Joppa Road, Suite 301	÷
Lutherville-Timonium, MD 21093	¥
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REPORT OF STEVEN D. MCCARUS, M.D.