

ANDREA LANE
4840 Clifton Avenue
Baltimore, MD 21207

and

DONOVAN C. MARTINEZ
4840 Clifton Avenue
Baltimore, MD 21207

Plaintiffs

and

TERESA HOFFMAN, M.D. AND
ASSOCIATES, LLC
301 St. Paul Place
Baltimore, MD 21202

SERVE ON: RESIDENT AGENT:
Linda H. Jones, Esq.
Suite 400
218 N. Charles Street
Baltimore, MD 21202

and

ST. PAUL PLACE SPECIALISTS, LLC
301 St. Paul Place
Baltimore, MD 21202

SERVE ON: RESIDENT AGENT:
Linda H. Jones, Esq.
Suite 400
218 N. Charles Street
Baltimore, MD 21202

and

MERCY MEDICAL CENTER, INC.
301 St. Paul Place
Baltimore, MD 21202

SERVE ON: RESIDENT AGENT:
Linda H. Jones, Esq.
Suite 400

* IN THE
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* CIRCUIT COURT
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* FOR
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* BALTIMORE CITY,
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* MARYLAND
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* CIVIL # 24-CV-5229

FILED
2024 JUN 19 10 15 AM
CLERK OF COURT

FILED
2024 JUN 19 10 15 AM
CLERK OF COURT

218 N. Charles Street
Baltimore, MD 21202

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and

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MERCY HEALTH SERVICES, INC.
301 St. Paul Street
Baltimore, MD 21202

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SERVE ON: RESIDENT AGENT:

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Linda H. Jones, Esq.
Suite 400
218 N. Charles Street
Baltimore, MD 21202

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Defendants

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COMPLAINT & ELECTION FOR JURY TRIAL

The Plaintiffs, Andrea Lane and Donovan C. Martinez, by and through their attorneys, Bruce J. Babij, Ellen B. Flynn, and Dugan, Babij, Tolley & Kohler, LLC, sue the Defendants, Teresa Hoffman, M.D. and Associates, LLC; Mercy Medical Center, Inc.; St. Paul Place Specialists, Inc.; and Mercy Health Services, Inc., and states as follows:

PARTIES

1. The Plaintiff, Andrea Lane, is an adult resident of the State of Maryland, residing at 4840 Clifton Avenue, Baltimore, Maryland 21207.
2. The Plaintiff, Donovan C. Martinez, is an adult resident of the State of Maryland residing at 4840 Clifton Avenue, Baltimore, Maryland 21207.

3. The Defendant, Teresa Hoffman, M.D., and Associates, LLC, is a medical corporation organized and existing under the law of the State of Maryland, with its principal place of business located in Baltimore City at 301 St. Paul Street, Baltimore, Maryland 21202.

4. The Defendant, St. Paul Place Specialists, LLC, is a medical corporation organized and existing under the laws of the State of Maryland, with its principal place of business located in Baltimore City at 301 St. Paul Place, Baltimore, Maryland 21202.

5. The Defendant, Mercy Medical Center, Inc., is a medical corporation organized and existing under the laws of the State of Maryland, with its principal place of business located in Baltimore City at 301 St. Paul Place, Baltimore, Maryland 21202.

6. The Defendant, Mercy Health Services, Inc., is a medical corporation organized and existing under the laws of the State of Maryland, with its principal place of business located in Baltimore City at 301 St. Paul Street, Baltimore, Maryland 21202.

AMOUNT OF CLAIM AND VENUE

7. The amount of this claim exceeds Thirty Thousand Dollars (\$30,000.00).

8. The Plaintiffs have complied with and satisfied all requirements and statutory conditions precedent of the Maryland Health Care malpractice Claims Act, Md. Cts. & Jud. Procs. Code Ann. §§ 3-2A-01 *et seq.*, in that the Plaintiffs filed their claims in the Health Care Alternative Dispute Resolution Office of on or about September 9, 2016. Statement of Claim, attached and incorporated herein as Exhibit 1. The Plaintiffs filed a Certificate of Merit and Report and Election to Waive Arbitration with the Health Care Alternative Dispute Resolution Office of Maryland on or about September 9, 2016, and an Order of Transfer was issued by the Health Care Alternative Dispute Resolution Office of

Maryland on or about September 14, 2016. Certificate of Merit and Report attached and incorporated herein as Exhibit 2; Election to Waive Arbitration attached and incorporated herein as Exhibit 3; and Order of Transfer, attached hereto as Exhibit 4.

9. The Plaintiffs relate back to, repeat, reallege, adopt and incorporate by reference the initial Statement of Claim filed in the Health Care Alternative Dispute Resolution Office of Maryland on September 9, 2016, as though fully set forth herein.

COUNT I
(Negligence – Teresa Hoffman, M.D. & Associates, LLC)

The Plaintiff, Andrea Lane, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 9 of this Statement of Claim as though fully set forth herein.

10. At all times of which the Plaintiffs complain, the Defendant, Teresa Hoffman, M.D. & Associates, LLC, was licensed to provide obstetrical medical services in the State of Maryland and represented to the public and to the Plaintiffs possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent medical corporation practicing in the medical specialty of obstetrics.

11. At all times of which the Plaintiffs complain, Remya Arul, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Teresa Hoffman, M.D. & Associates, LLC.

12. At all times of which the Plaintiffs complain, Janna Mudd, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Teresa Hoffman, M.D. & Associates, LLC.

13. At all times of which the Plaintiffs complain, Teresa Hoffman, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Teresa Hoffman, M.D. & Associates, LLC.

14. At all times of which the Plaintiffs complain, Tracie Cox, CNM, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Teresa Hoffman, M.D. & Associates, LLC.

15. At all times of which the Plaintiffs complain, Erika Nichelson, M.D, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Teresa Hoffman, M.D. & Associates, LLC.

16. At all times of which the Plaintiff complains, the individual Health Care Providers who provided obstetrical and pre-natal care and treatment to the Plaintiff, Andrea Lane, including, but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., were each acting as the real and/or apparent agents, servants and/or employees of the Defendant, Teresa Hoffman, M.D. & Associates, LLC.

17. The Defendant, Teresa Hoffman, M.D. & Associates, LLC, through its real and/or apparent agents, servants and/or employees, including, but not limited to, Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., owed to the Plaintiffs a duty to exercise that degree of care, skill and judgment ordinarily expected of a reasonably competent medical corporation practicing in the medical specialties of obstetrics and maternal/fetal medicine in the same or similar circumstances; that duty included the proper acquisition and interpretation of clinical, radiologic, laboratory, pathologic and diagnostic information and data; the

prompt performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Plaintiff, Andrea Lane, and/or her baby; the prompt employment of appropriate care and treatments to correct such condition(s) and the duty of appropriate notification to the Plaintiff, Andrea Lane, of the various alternatives and risks involved in various modalities of treatment and delivery.

18. On or about June 26, 2015, the Plaintiff, Andrea Lane, came under the care and treatment of Defendant Teresa Hoffman, M.D. & Associates, LLC, for the provision of obstetrical medical care attendant to her pregnancy with Donovan Elijah Martinez, deceased.

19. The Plaintiffs aver that, as a result of the inadequate and inappropriate management of her pregnancy by the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., the Plaintiff, Andrea Lane, suffered the untreated and unmitigated progression of severe pre-eclampsia, eclampsia, eclamptic seizures and the attendant death of her baby.

20. The Plaintiffs further aver that during the course of Defendant, Teresa Hoffman, M.D. & Associates, LLC's, obstetrical care and treatment of the Plaintiff, Andrea Lane, the Plaintiff suffered significant weight gain, the development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of her last prenatal visit on 11/16/15 at which time the Plaintiff was also reported to be complaining of upper gastric abdominal pain.

21. The Plaintiffs further aver that, on or about November 18, 2015, the Plaintiff, Andrea Lane, was observed to be exhibiting seizure activity. An ambulance was called and the Plaintiff was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was eventually delivered dead via Cytotec induced vaginal delivery on November 18, 2015. The Plaintiff, Andrea Lane, was diagnosed with severe pre-eclampsia/eclampsia directly causing the death of her baby and grievous injury and harm to herself.

22. The Plaintiffs further aver that, as a result of the inadequate, inappropriate and negligent medical and nursing care, treatment and management of Andrea Lane's prenatal care by the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its agents, servants and/or employees, the Plaintiff, Andrea Lane, was severely injured and damaged and her baby, Donovan Elijah Martinez, died.

23. The Plaintiffs further aver that the injuries, damages and losses complained of by them were due to the negligent and careless acts and omissions of the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, who breached their aforementioned duties to the Plaintiffs.

24. The negligent and careless acts and omissions of the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, include, but are not limited to:

- a. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the condition of the Plaintiff, Andrea Lane, and/or that of her baby;
- b. Failing to diagnose such conditions carefully;

- c. Failing to employ appropriate treatments and procedures to correct such conditions;
- d. Failing to carefully and thoroughly evaluate the effects of the chosen treatments;
- e. Failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Plaintiff's pregnancy with Donovan Elijah Martinez (deceased);
- f. Failing to expeditiously and reasonably monitor and treat the Plaintiff, Andrea Lane, for pre-eclampsia/eclampsia; pre-eclampsia
- g. Failing to reasonably advise the Plaintiff of the signs, symptoms and the maternal and fetal consequences associated with the development of pre-eclampsia and eclampsia an; pre-eclampsia
- h. Being otherwise careless and negligent.

25. The Plaintiffs further aver that, as a result of the negligent and careless acts and omissions of the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually and by and through its duly authorized agents, servants and/or employees, the Plaintiff, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her viable baby, Donovan Elijah Martinez, and has otherwise been injured and damaged.

26. The Plaintiffs further aver that, as a result of the negligent and careless acts and omissions of the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and through its duly authorized agents, servants and/or employees, the Plaintiff, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal

vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

27. The Plaintiffs further aver that, as a result of the negligence of the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its duly authorized agents, servants and/or employees, the Plaintiff, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

28. The Plaintiffs further aver that all of the injuries, damages and losses complained of by them, and the death of their son, Donovan Elijah Martinez, were caused by the negligence of the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Plaintiff contributing thereto.

WHEREFORE, this claim is brought by the Plaintiffs, Andrea Lane, against the Defendant, Teresa Hoffman, M.D. & Associates, LLC, for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT II
(Informed Consent – Teresa Hoffman, M.D. & Associates, LLC)

The Plaintiff, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 28 of this Statement of Claim as though fully set forth herein.

29. The Plaintiffs further aver that, the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its real and/or apparent agents, servants and/or employees, owed to the Plaintiff, Andrea Lane, the appropriate and timely notification to the Plaintiff of the various alternatives and risks involved in various modalities of monitoring, care and treatment including, but not limited to, the risks and benefits of inpatient hospitalization, of the treatment for developing pre-eclampsia and eclampsia with appropriate medications and the potential need for the preterm delivery of her viable baby and other available modalities for the monitoring, care and treatment of any progression in the development of pre-eclampsia and eclampsia.

30. The Plaintiffs further aver that the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its real and/or apparent agents, servants and/or employees, failed to appropriately, timely and adequately obtain an informed consent from the Plaintiff, Andrea Lane, to its chosen course of pregnancy monitoring, management, care and treatment.

31. The Plaintiffs further aver that, as a result of the failure by the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its duly authorized real and/or apparent agents, servants and/or employees, to obtain an informed consent, the Plaintiff, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her fetus, and has otherwise been injured and damaged.

32. The Plaintiffs further aver that, as a result of the failure by the Defendant, Teresa Hoffman, M.D. & Associates, LLC, through its duly authorized real and/or

apparent agents, servants and/or employees, to obtain an informed consent, the Plaintiff, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

33. The Plaintiffs further aver that, as a result of the failure by the Defendant, Teresa Hoffman, M.D. & Associates, LLC, through its duly authorized real and/or apparent agents, servants and/or employees, to obtain an informed consent, the Plaintiff, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

34. The Plaintiffs further aver that, as a result of the failure by the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its duly authorized real and/or apparent agents, servants and/or employees, to obtain an informed consent, the Plaintiff, Andrea Lane, has been forced to incur and in the future will continue to incur, expenses for the medical care, medicines, rehabilitation costs and related damages and expenses.

35. The Plaintiffs further aver that all of the injuries and damages complained of by her were caused by the failure to obtain an informed consent by the Defendant, Teresa Hoffman, M.D. & Associates, LLC, individually and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Plaintiff contributing thereto.

WHEREFORE, this claim is brought by the Plaintiffs, Andrea Lane, against the Defendant, Teresa Hoffman, M.D. & Associates, LLC, for an amount in excess of the

minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT III
(Negligence – Mercy Medical Center, Inc.)

The Plaintiff, Andrea Lane, realleges, adopts and incorporates by reference paragraphs 1 through 35 of this Statement of Claim as though fully set forth herein.

36. At all times of which the Plaintiff complains, the Defendant, Mercy Medical Center, Inc., was licensed to provide obstetrical medical services in the State of Maryland and represented to the public and to the Plaintiffs possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent medical corporation practicing in the medical specialty of obstetrics.

37. At all times of which the Plaintiff complains, Remya Arul, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Medical Center, Inc.

38. At all times of which the Plaintiff complains, Janna Mudd, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Medical Center, Inc.

39. At all times of which the Plaintiff complains, Teresa Hoffman, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Medical Center, Inc.

40. At all times of which the Plaintiff complains, Tracie Cox, CNM, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Medical Center, Inc.

41. At all times of which the Plaintiff complains, Erika Nichelson, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Medical Center, Inc.

42. At all times of which the Plaintiff complains, the individual Health Care Providers who provided obstetrical and labor and delivery care and treatment to the Plaintiff, including, but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., were each acting as the real and/or apparent agents, servants and/or employees of the Defendant, Mercy Medical Center, Inc.

43. The Defendant, Mercy Medical Center, Inc., through its real and/or apparent agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., owed to the Plaintiff a duty to exercise that degree of care, skill and judgment ordinarily expected of a reasonably competent medical corporation practicing in the medical specialties of obstetrics and maternal/fetal medicine in the same or similar circumstances; that duty included the proper acquisition and interpretation of clinical, radiologic, laboratory, pathologic and diagnostic information and data; the prompt performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Plaintiff, Andrea Lane; the prompt employment of appropriate care and treatments to correct such condition(s) and the duty of appropriate notification to the Plaintiff, Andrea Lane, of the various alternatives and risks involved in various modalities of treatment and delivery.

44. On or about June 26, 2015, Plaintiff Andrea Lane, came under the care and treatment of Defendant Mercy Medical Center, Inc., for the provision of obstetrical medical care attendant to her pregnancy with Donovan Elijah Martinez.

45. The Plaintiff further avers that, as a result of the inadequate and inappropriate management of her pregnancy by the Defendant, Mercy Medical Center, Inc., individually and by and through its agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., the Plaintiff, Andrea Lane, suffered progression of severe eclampsia, seizure, and loss of her fetus.

46. During the course of Defendant, Mercy Medical Center, Inc.'s treatment of Ms. Lane, Ms. Lane suffered significant weight gain, the development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of the last prenatal visit on 11/16/15 at which time the patient was also reported to be complaining of upper abdominal pain. Despite these findings, Plaintiff Andrea Lane was not admitted to the hospital or scheduled to be admitted to the hospital for further evaluation or treatment of pre-eclampsia/eclampsia.

47. The Plaintiff further avers that on or about November 18, 2015, Ms. Lane was observed to be exhibiting seizure-like activity. An ambulance was called and Ms. Lane was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was delivered via Cytotec induced vaginal delivery on November 18, 2015. Ms. Lane was diagnosed with pre-eclampsia/eclampsia to which the fetal death in utero was attributed.

48. The Plaintiff further avers that, as a result of the inadequate, inappropriate and negligent medical and nursing care, treatment and management of Andrea Lane's prenatal care by the Defendant, Mercy Medical Center, Inc., individually and by and through its agents, servants and/or employees, the Plaintiff, Andrea Lane, was severely injured and damaged.

49. The Plaintiff further avers that the injuries, damages and losses complained of by her were due to the negligent and careless acts and omissions of the Defendant, Mercy Medical Center, Inc., individually and by and through its real and/or apparent agents, servants and employees, who breached their aforementioned duties to the Plaintiff, Andrea Lane.

50. The negligent and careless acts and omissions of the Defendant, Teresa Hoffman, M.D., & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, include, but are not limited to:

- a. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the condition of the Plaintiff, Andrea Lane;
- b. Failing to diagnose such conditions carefully;
- c. Failing to employ appropriate treatments and procedures to correct such conditions;
- d. Failing to carefully and thoroughly evaluate the effects of the chosen treatments;
- e. Failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Plaintiff's pregnancy with Donavan Elijah Martinez (deceased);
- f. Failing to admit Plaintiff Andrea Lane for monitoring and treatment of severe pre-eclampsia;
- g. Failing to prescribe and administer anti-seizure prophylaxis medication;

- h. Failing to advise Plaintiff of the risks and benefits of treatment of pre-eclampsia and eclampsia;
- i. being otherwise careless and negligent in the management of developing signs and symptoms of pre-eclampsia and eclampsia.

51. The Plaintiff, Andrea Lane, further avers that, as a result of the negligent and careless acts and omissions of the Defendant, Mercy Medical Center, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Plaintiff, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her viable fetus Donovan Elijah Martinez, and has otherwise been injured and damaged.

52. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Medical Center, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

53. The Plaintiff further avers that, as a result of the negligence of the Defendant, Mercy Medical Center, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Plaintiff, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

54. The Plaintiff, Andrea Lane, further avers that all of the injuries, damages and losses complained of by her were caused by the negligence of the Defendant, Mercy Medical Center, Inc., individually and by and through its duly authorized agent, servants and/or employees, without any negligence or want of due care by the Plaintiff contributing thereto.

WHEREFORE, this claim is brought by the Plaintiff, Andrea Lane, against the Defendant, Mercy Medical Center, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT IV
(Informed Consent – Mercy Medical Center, Inc.)

The Plaintiff, Andrea Lane, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 54 of this Statement of Claim as though fully set forth herein.

55. The Defendant, Mercy Medical Center, Inc., owed to the Plaintiff, Andrea Lane, the duty of appropriate and timely notification to the Plaintiff of the various alternatives and risks involved in various modalities of treatment and delivery, including, but not limited to, the risks and benefits of treatment of pre-eclampsia with seizure prophylaxis medications, delivery of her preterm fetus, and/or hospital admission for close monitoring and treatment of her signs of symptoms of pre-eclampsia and eclampsia.

56. The Plaintiff further avers that the Defendant, Mercy Medical Center, Inc., individually and by and through its real and/or apparent agents, servants and/or

employees, was negligent in failing to appropriately, timely and adequately obtain an informed consent from the Plaintiff, Andrea Lane, to its chosen course of pregnancy management, treatment and delivery, and was otherwise negligent.

57. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Medical Center, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her fetus, and has otherwise been injured and damaged.

58. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Medical Center, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

59. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Medical Center, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

60. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Medical Center, Inc., individually and by and

through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, has been forced to incur and in the future will continue to incur, expenses for the medical care, medicines, rehabilitation costs and related damages and expenses.

61. The Plaintiff further avers that all of the injuries and damages complained of by her were caused by the failure to obtain an informed consent by the Defendant, Mercy Medical Center, Inc., individually and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Plaintiff contributing thereto.

WHEREFORE, this claim is brought by the Plaintiff, Andrea Lane, against the Defendant, Mercy Medical Center, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT V
(Negligence – St. Paul Specialists, Inc.)

The Plaintiff, Andrea Lane, realleges, adopts and incorporates by reference paragraphs 1 through 61 of this Statement of Claim as though fully set forth herein.

62. At all times of which the Plaintiff complains, the Defendant, St. Paul Specialists, Inc., was licensed to provide obstetrical medical services in the State of Maryland and represented to the public and to the Plaintiffs possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent medical corporation practicing in the medical specialty of obstetrics.

63. At all times of which the Plaintiff complains, Remya Arul, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, St. Paul Specialists, Inc.

64. At all times of which the Plaintiff complains, Janna Mudd, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, St. Paul Specialists, Inc.

65. At all times of which the Plaintiff complains, Teresa Hoffman, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, St. Paul Specialists, Inc.

66. At all times of which the Plaintiff complains, Tracie Cox, CNM, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, St. Paul Specialists, Inc.

67. At all times of which the Plaintiff complains, Erika Nichelson, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, St. Paul Specialists, Inc.

68. At all times of which the Plaintiff complains, the individual Health Care Providers who provided obstetrical and labor and delivery care and treatment to the Plaintiff, including, but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., were each acting as the real and/or apparent agents, servants and/or employees of the Defendant, St. Paul Specialists, Inc.

69. The Defendant, St. Paul Specialists, Inc., through its real and/or apparent agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna

Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., owed to the Plaintiff a duty to exercise that degree of care, skill and judgment ordinarily expected of a reasonably competent medical corporation practicing in the medical specialties of obstetrics and maternal/fetal medicine in the same or similar circumstances; that duty included the proper acquisition and interpretation of clinical, radiologic, laboratory, pathologic and diagnostic information and data; the prompt performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Plaintiff, Andrea Lane; the prompt employment of appropriate care and treatments to correct such condition(s) and the duty of appropriate notification to the Plaintiff, Andrea Lane, of the various alternatives and risks involved in various modalities of treatment and delivery.

70. On or about June 26, 2015, Plaintiff Andrea Lane, came under the care and treatment of Defendant St. Paul Specialists, Inc., for the provision of obstetrical medical care attendant to her pregnancy with Donovan Elijah Martinez.

71. The Plaintiff further avers that, as a result of the inadequate and inappropriate management of her pregnancy by the Defendant, St. Paul Specialists, Inc., individually and by and through its agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., the Plaintiff, Andrea Lane, suffered progression of severe eclampsia, seizure, and loss of her fetus.

72. During the course of Defendant, St. Paul Specialists, Inc.'s treatment of Ms. Lane, Ms. Lane suffered significant weight gain, the development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of the last

prenatal visit on 11/16/15 at which time the patient was also reported to be complaining of upper abdominal pain. Despite these findings, Plaintiff Andrea Lane was not admitted to the hospital or scheduled to be admitted to the hospital for further evaluation or treatment of pre-eclampsia/eclampsia.

73. The Plaintiff further avers that on or about November 18, 2015, Ms. Lane was observed to be exhibiting seizure-like activity. An ambulance was called and Ms. Lane was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was delivered via Cytotec induced vaginal delivery on November 18, 2015. Ms. Lane was diagnosed with pre-eclampsia/eclampsia to which the fetal death in utero was attributed.

74. The Plaintiff further avers that, as a result of the inadequate, inappropriate and negligent medical and nursing care, treatment and management of Andrea Lane's prenatal care by the Defendant, St. Paul Specialists, Inc., individually and by and through its agents, servants and/or employees, the Plaintiff, Andrea Lane, was severely injured and damaged.

75. The Plaintiff further avers that the injuries, damages and losses complained of by her were due to the negligent and careless acts and omissions of the Defendant, St. Paul Specialists, Inc., individually and by and through its real and/or apparent agents, servants and employees, who breached their aforementioned duties to the Plaintiff, Andrea Lane.

76. The negligent and careless acts and omissions of the Defendant, Teresa Hoffman, M.D., & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, include, but are not limited to:

- a. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the condition of the Plaintiff, Andrea Lane;
- b. Failing to diagnose such conditions carefully;
- c. Failing to employ appropriate treatments and procedures to correct such conditions;
- d. Failing to carefully and thoroughly evaluate the effects of the chosen treatments;
- e. Failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Plaintiff's pregnancy with Donovan Elijah Martinez (deceased);
- f. Failing to admit Plaintiff Andrea Lane for monitoring and treatment of severe pre-eclampsia;
- g. Failing to prescribe and administer anti-seizure prophylaxis medication;
- h. Failing to advise Plaintiff of the risks and benefits of treatment of pre-eclampsia and eclampsia;
- i. being otherwise careless and negligent in the management of developing signs and symptoms of pre-eclampsia and eclampsia.

77. The Plaintiff, Andrea Lane, further avers that, as a result of the negligent and careless acts and omissions of the Defendant, St. Paul Specialists, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Plaintiff, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her viable fetus Donovan Elijah Martinez, and has otherwise been injured and damaged.

78. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, St. Paul Specialists, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

79. The Plaintiff further avers that, as a result of the negligence of the Defendant, St. Paul Specialists, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Plaintiff, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

80. The Plaintiff, Andrea Lane, further avers that all of the injuries, damages and losses complained of by her were caused by the negligence of the Defendant, St. Paul Specialists, Inc., individually and by and through its duly authorized agent, servants and/or employees, without any negligence or want of due care by the Plaintiff contributing thereto.

WHEREFORE, this claim is brought by the Plaintiff, Andrea Lane, against the Defendant, St. Paul Specialists, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT VI
(Informed Consent – St. Paul Specialists, Inc.)

The Plaintiff, Andrea Lane, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 80 of this Statement of Claim as though fully set forth herein.

81. The Defendant, St. Paul Specialists, Inc., owed to the Plaintiff, Andrea Lane, the duty of appropriate and timely notification to the Plaintiff of the various alternatives and risks involved in various modalities of treatment and delivery, including, but not limited to, the risks and benefits of treatment of pre-eclampsia with seizure prophylaxis medications, delivery of her preterm fetus, and/or hospital admission for close monitoring and treatment of her signs of symptoms of pre-eclampsia and eclampsia.

82. The Plaintiff further avers that the Defendant, St. Paul Specialists, Inc., individually and by and through its real and/or apparent agents, servants and/or employees, was negligent in failing to appropriately, timely and adequately obtain an informed consent from the Plaintiff, Andrea Lane, to its chosen course of pregnancy management, treatment and delivery, and was otherwise negligent.

83. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, St. Paul Specialists, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her fetus, and has otherwise been injured and damaged.

84. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, St. Paul Specialists, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

85. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, St. Paul Specialists, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

86. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, St. Paul Specialists, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, has been forced to incur and in the future will continue to incur, expenses for the medical care, medicines, rehabilitation costs and related damages and expenses.

87. The Plaintiff further avers that all of the injuries and damages complained of by her were caused by the failure to obtain an informed consent by the Defendant, St. Paul Specialists, Inc., individually and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Plaintiff contributing thereto.

WHEREFORE, this claim is brought by the Plaintiff, Andrea Lane, against the Defendant, St. Paul Specialists, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT VII
(Negligence – Mercy Health Services, Inc.)

The Plaintiff, Andrea Lane, realleges, adopts and incorporates by reference paragraphs 1 through 87 of this Statement of Claim as though fully set forth herein.

88. At all times of which the Plaintiff complains, the Defendant, Mercy Health Services, Inc., was licensed to provide obstetrical medical services in the State of Maryland and represented to the public and to the Plaintiffs possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent medical corporation practicing in the medical specialty of obstetrics.

89. At all times of which the Plaintiff complains, Remya Arul, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Health Services, Inc.

90. At all times of which the Plaintiff complains, Janna Mudd, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Health Services, Inc.

91. At all times of which the Plaintiff complains, Teresa Hoffman, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Health Services, Inc.

92. At all times of which the Plaintiff complains, Tracie Cox, CNM, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Health Services, Inc.

93. At all times of which the Plaintiff complains, Erika Nichelson, M.D, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant, Mercy Health Services, Inc.

94. At all times of which the Plaintiff complains, the individual Health Care Providers who provided obstetrical and labor and delivery care and treatment to the Plaintiff, including, but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., were each acting as the real and/or apparent agents, servants and/or employees of the Defendant, Mercy Health Services, Inc.

95. The Defendant, Mercy Health Services, Inc., through its real and/or apparent agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., owed to the Plaintiff a duty to exercise that degree of care, skill and judgment ordinarily expected of a reasonably competent medical corporation practicing in the medical specialties of obstetrics and maternal/fetal medicine in the same or similar circumstances; that duty included the proper acquisition and interpretation of clinical, radiologic, laboratory, pathologic and diagnostic information and data; the prompt performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Plaintiff, Andrea Lane; the prompt employment of appropriate care and treatments to correct such condition(s) and

the duty of appropriate notification to the Plaintiff, Andrea Lane, of the various alternatives and risks involved in various modalities of treatment and delivery.

96. On or about June 26, 2015, Plaintiff Andrea Lane, came under the care and treatment of Defendant Mercy Health Services, Inc., for the provision of obstetrical medical care attendant to her pregnancy with Donovan Elijah Martinez.

97. The Plaintiff further avers that, as a result of the inadequate and inappropriate management of her pregnancy by the Defendant, Mercy Health Services, Inc., individually and by and through its agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., the Plaintiff, Andrea Lane, suffered progression of severe eclampsia, seizure, and loss of her fetus.

98. During the course of Defendant, Mercy Health Services, Inc.'s treatment of Ms. Lane, Ms. Lane suffered significant weight gain, the development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of the last prenatal visit on 11/16/15 at which time the patient was also reported to be complaining of upper abdominal pain. Despite these findings, Plaintiff Andrea Lane was not admitted to the hospital or scheduled to be admitted to the hospital for further evaluation or treatment of pre-eclampsia/eclampsia.

99. The Plaintiff further avers that on or about November 18, 2015, Ms. Lane was observed to be exhibiting seizure-like activity. An ambulance was called and Ms. Lane was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was delivered via Cytotec induced vaginal delivery on

November 18, 2015. Ms. Lane was diagnosed with pre-eclampsia/eclampsia to which the fetal death in utero was attributed.

100. The Plaintiff further avers that, as a result of the inadequate, inappropriate and negligent medical and nursing care, treatment and management of Andrea Lane's prenatal care by the Defendant, Mercy Health Services, Inc., individually and by and through its agents, servants and/or employees, the Plaintiff, Andrea Lane, was severely injured and damaged.

101. The Plaintiff further avers that the injuries, damages and losses complained of by her were due to the negligent and careless acts and omissions of the Defendant, Mercy Health Services, Inc., individually and by and through its real and/or apparent agents, servants and employees, who breached their aforementioned duties to the Plaintiff, Andrea Lane.

102. The negligent and careless acts and omissions of the Defendant, Teresa Hoffman, M.D., & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, include, but are not limited to:

- a. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the condition of the Plaintiff, Andrea Lane;
- b. Failing to diagnose such conditions carefully;
- c. Failing to employ appropriate treatments and procedures to correct such conditions;
- d. Failing to carefully and thoroughly evaluate the effects of the chosen treatments;
- e. Failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Plaintiff's pregnancy with Donovan Elijah Martinez (deceased);

- f. Failing to admit Plaintiff Andrea Lane for monitoring and treatment of severe pre-eclampsia;
- g. Failing to prescribe and administer anti-seizure prophylaxis medication;
- h. Failing to advise Plaintiff of the risks and benefits of treatment of pre-eclampsia and eclampsia;
- i. being otherwise careless and negligent in the management of developing signs and symptoms of pre-eclampsia and eclampsia.

103. The Plaintiff, Andrea Lane, further avers that, as a result of the negligent and careless acts and omissions of the Defendant, Mercy Health Services, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Plaintiff, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her viable fetus Donovan Elijah Martinez, and has otherwise been injured and damaged.

104. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Health Services, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

105. The Plaintiff further avers that, as a result of the negligence of the Defendant, Mercy Health Services, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Plaintiff, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the

treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

106. The Plaintiff, Andrea Lane, further avers that all of the injuries, damages and losses complained of by her were caused by the negligence of the Defendant, Mercy Health Services, Inc., individually and by and through its duly authorized agent, servants and/or employees, without any negligence or want of due care by the Plaintiff contributing thereto.

WHEREFORE, this claim is brought by the Plaintiff, Andrea Lane, against the Defendant, Mercy Health Services, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT VIII
(Informed Consent – Mercy Health Services, Inc.)

The Plaintiff, Andrea Lane, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 106 of this Statement of Claim as though fully set forth herein.

107. The Defendant, Mercy Health Services, Inc., owed to the Plaintiff, Andrea Lane, the duty of appropriate and timely notification to the Plaintiff of the various alternatives and risks involved in various modalities of treatment and delivery, including, but not limited to, the risks and benefits of treatment of pre-eclampsia with seizure prophylaxis medications, delivery of her preterm fetus, and/or hospital admission for close monitoring and treatment of her signs of symptoms of pre-eclampsia and eclampsia.

108. The Plaintiff further avers that the Defendant, Mercy Health Services, Inc., individually and by and through its real and/or apparent agents, servants and/or employees, was negligent in failing to appropriately, timely and adequately obtain an informed consent from the Plaintiff, Andrea Lane, to its chosen course of pregnancy management, treatment and delivery, and was otherwise negligent.

109. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Health Services, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her fetus, and has otherwise been injured and damaged.

110. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Health Services, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

111. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Health Services, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

112. The Plaintiff further avers that, as a result of the failure to obtain an informed consent by the Defendant, Mercy Health Services, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Plaintiff, Andrea Lane, has been forced to incur and in the future will continue to incur, expenses for the medical care, medicines, rehabilitation costs and related damages and expenses.

113. The Plaintiff further avers that all of the injuries and damages complained of by her were caused by the failure to obtain an informed consent by the Defendant, Mercy Health Services, Inc., individually and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Plaintiff contributing thereto.

WHEREFORE, this claim is brought by the Plaintiff, Andrea Lane, against the Defendant, Mercy Health Services, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT IX

(Wrongful Death- Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc.)

The Plaintiffs, Andrea Lane, as surviving mother, and Donovan C. Martinez, as surviving father, of Donovan Elijah Martinez, deceased, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 113 of this Statement of Claim as though fully set forth herein.

114. This action is timely brought and joins and includes all persons entitled to recover under the Wrongful Death Subtitle, Md. Cts. & Jud. Procs. Code Ann. §§ 3-901 et seq., for the wrongful death of Donovan Elijah Martinez.

115. Plaintiff Andrea Lane is the surviving mother of Donovan Elijah Martinez, deceased. Donovan C. Martinez is the surviving father of Donovan Elijah Martinez. As such, the Plaintiffs are authorized and empowered to bring this action in accordance with Md. Cts. & Jud. Procs. Code Ann. §§ 3-901 et seq.

116. As a result of the negligence of the Defendants, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., through their real, apparent and/or ostensible agents, servants and/or employees, the Plaintiff Andrea Lane has suffered, is suffering and will continue to suffer, mental anguish, emotional pain and suffering, loss of society, loss of companionship, loss of comfort, loss of protection, loss of affection, loss of care, loss of attention, loss of advice, loss of counsel, and loss of solatium in the wrongful death of her son, Donovan Elijah Martinez.

117. As a result of the negligence of the Defendants, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., through their real, apparent and/or ostensible agents, servants and/or employees, the Plaintiff Donovan Martinez has suffered, is suffering and will continue to suffer, mental anguish, emotional pain and suffering, loss of society, loss of companionship, loss of comfort, loss of protection, loss of affection, loss of care, loss of attention, loss of advice, loss of counsel, and loss of solatium in the wrongful death of his son, Donovan Elijah Martinez.

118. As a further result of the negligence of the Defendants, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., through their real, apparent and/or ostensible agents, servants and/or employees, the Plaintiffs Andrea Lane and Donovan C. Martinez was compelled to incur hospital, medical and funeral expenses for Donovan Elijah Martinez, and was otherwise injured and damaged.

119. All of the injuries and damages complained of were caused by the negligence of the Defendants, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., by and through their respective real, apparent and/or ostensible agents, servants and/or employees, without any negligence by the Plaintiffs and/or the Plaintiffs' decedent contributing thereto.

WHEREFORE, the Plaintiffs, Andrea Lane, and Donovan C. Martinez, bring this claim against the Defendants, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., in an amount in excess of the minimum jurisdiction for the Health Care Alternative Dispute Resolution Office.



BRUCE J. BABIJ
ELLEN B. FLYNN ✓
Dugan, Babij, Tolley & Kohler, LLC
1966 Greenspring Drive, Suite 500
Timonium, Maryland 21093
(410) 308-1600
Attorneys for Plaintiffs

ANDREA LANE
4840 Clifton Avenue
Baltimore, MD 21207

and

DONOVAN C. MARTINEZ
4840 Clifton Avenue
Baltimore, MD 21207

Plaintiffs

and

TERESA HOFFMAN, M.D. AND
ASSOCIATES, LLC
301 St. Paul Place
Baltimore, MD 21202

SERVE ON: RESIDENT AGENT:
Linda H. Jones, Esq.
Suite 400
218 N. Charles Street
Baltimore, MD 21202

and

ST. PAUL PLACE SPECIALISTS, LLC
301 St. Paul Place
Baltimore, MD 21202

SERVE ON: RESIDENT AGENT:
Linda H. Jones, Esq.
Suite 400
218 N. Charles Street
Baltimore, MD 21202

and

MERCY MEDICAL CENTER, INC.
301 St. Paul Place
Baltimore, MD 21202

SERVE ON: RESIDENT AGENT:
Linda H. Jones, Esq.
Suite 400

* IN THE
*
* CIRCUIT COURT
*
* FOR
*
* BALTIMORE CITY,
*
* MARYLAND
*
* CIVIL #

218 N. Charles Street
Baltimore, MD 21202

and

MERCY HEALTH SERVICES, INC.
301 St. Paul Street
Baltimore, MD 21202

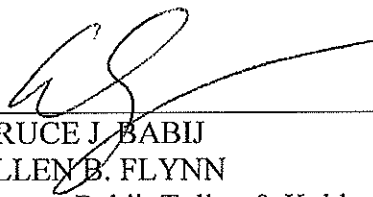
SERVE ON: RESIDENT AGENT:
Linda H. Jones, Esq.
Suite 400
218 N. Charles Street
Baltimore, MD 21202

Defendants

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ELECTION FOR JURY TRIAL

The Plaintiffs in the above titled claim elect to have this case heard before a jury panel.



BRUCE J. BABIJ
ELLEN B. FLYNN
Dugan, Babij, Tolley & Kohler, LLC
1966 Greenspring Drive, Suite 500
Timonium, Maryland 21093
(410) 308-1600
Attorneys for Plaintiffs

EXHIBIT 1

HEALTH CARE ALTERNATIVE DISPUTE RESOLUTION OFFICE

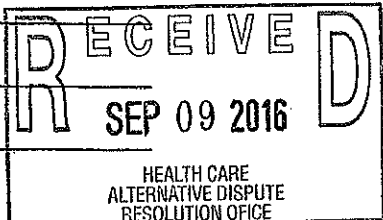
6 St. Paul Street, Suite 1501
Baltimore, Maryland 21202-1608
(410) 767-8200

CLAIM FORM

HCA NO.: 2016.446

CLAIMANT(S)

Andrea Lane
Name
4840 Clifton Avenue
Street Address
Baltimore, MD 21207
City, State, Zip Code



Donovan C. Martinez
Name
4840 Clifton Avenue
Street Address
Baltimore, MD 21207
City, State, Zip Code

Name
Street Address
City, State, Zip Code

HEALTH CARE PROVIDER(S)

St. Paul Place Specialists, LLC
Name
301 St. Paul Place
Street Address
Baltimore, MD 21202
City, State, Zip Code
SERVE ON: RESIDENT AGENT:
Linda H. Jones
Gallagher, Evelius & Jones, LLP
Suite 400
218 N. Charles Street
Baltimore, MD 21201

Mercy Medical Center, Inc.
Name
301 St. Paul Place
Street Address
Baltimore, MD 21202
City, State, Zip Code
SERVE ON: RESIDENT AGENT:
Linda H. Jones
Suite 400, 218 N. Charles Street
Baltimore, MD 21201

Mercy Health Services, Inc.
Name
301 St. Paul Street
Street Address
Baltimore, MD 21202
City, State, Zip Code
SERVE ON: RESIDENT AGENT:
Linda H. Jones
Suite 400, 218 N. Charles Street
Baltimore, MD 212101

(1) This claim is filed pursuant to Title 3, Subtitle 2A of the Courts Article. The damages claimed are in excess of \$ 30,000.00 and the appropriate venue is: Baltimore City

(2) The basis of the claim is described on the page(s) attached hereto.

(3) The resolution of the claim will involve particular expertise in this area of specialty obstetrics/gynecology
(PLEASE SEE REVERSE SIDE FOR AREAS OF CONCENTRATION)

WARNING: Each Claimant has been advised that he/she may be held civilly liable for part or all the Costs resulting from the filing of this claim, whether it is won or lost; this would be an individual and personal responsibility.

ATTORNEY FOR CLAIMANT(S)

Signature
1966 Greenspring Drive, Suite 500
Street Address
Timonium, MD 21093
City, State, Zip Code
410-308-1600
Telephone Number

CLAIMANT(S)

Signature for each Claimant
Signature
Signature

PARTIES CONTINUED:

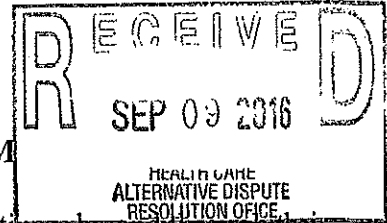
Health Care Providers/Defendants:

Teresa Hoffman, M.D. and
Associates, LLC
301 St. Paul Place
Baltimore, MD 21202

SERVE ON: RESIDENT AGENT:

Linda H. Jones, Esq.
Suite 400
218 N. Charles Street
Baltimore, MD 21201

2016.446



STATEMENT OF CLAIM

The Claimants, Andrea Lane and Donovan C. Martinez, by and through their attorneys, Bruce J. Babij, Ellen B. Flynn, and Dugan, Babij, Tolley & Kohler, LLC, sue the Defendants/Health Care Providers, Teresa Hoffman, M.D. and Associates, LLC; Mercy Medical Center, Inc.; St. Paul Place Specialists, Inc.; and Mercy Health Services, Inc., and states as follows:

PARTIES

1. The Claimant, Andrea Lane, is an adult resident of the State of Maryland, residing at 4840 Clifton Avenue, Baltimore, Maryland 21207.
2. The Claimant, Donovan C. Martinez, is an adult resident of the State of Maryland residing at 4840 Clifton Avenue, Baltimore, Maryland 21207.
3. The Defendant/Health Care Provider, Teresa Hoffman, M.D., and Associates, LLC, is a medical corporation organized and existing under the law of the State of Maryland, with its principal place of business located in Baltimore City at 301 St. Paul Street, Baltimore, Maryland 21202.
4. The Defendant/Health Care Provider, St. Paul Place Specialists, LLC, is a medical corporation organized and existing under the laws of the State of Maryland, with its principal place of business located in Baltimore City at 301 St. Paul Place, Baltimore, Maryland 21202.
5. The Defendant/Health Care Provider, Mercy Medical Center, Inc., is a medical corporation organized and existing under the laws of the State of Maryland, with

its principal place of business located in Baltimore City at 301 St. Paul Place, Baltimore, Maryland 21202.

6. The Defendant, Mercy Health Services, Inc., is a medical corporation organized and existing under the laws of the State of Maryland, with its principal place of business located in Baltimore City at 301 St. Paul Street, Baltimore, Maryland 21202.

AMOUNT OF CLAIM AND VENUE

7. The amount of this claim exceeds Thirty Thousand Dollars (\$30,000.00).

8. Venue is appropriate in Baltimore City as the forum where the Defendants carry on a regular business, are employed, and/or habitually engage in a vocation, and as the forum in which the Claimants' cause of action arose.

COUNT I

(Negligence – Teresa Hoffman, M.D. & Associates, LLC)

The Claimant, Andrea Lane, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 8 of this Statement of Claim as though fully set forth herein.

9. At all times of which the Claimants complain, the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, was licensed to provide obstetrical medical services in the State of Maryland and represented to the public and to the Claimants possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent medical corporation practicing in the medical specialty of obstetrics.

10. At all times of which the Claimants complain, Remya Arul, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC.

11. At all times of which the Claimants complain, Janna Mudd, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC.

12. At all times of which the Claimants complain, Teresa Hoffman, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC.

13. At all times of which the Claimants complain, Tracie Cox, CNM, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC.

14. At all times of which the Claimants complain, Erika Nichelson, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC.

15. At all times of which the Claimant complains, the individual Health Care Providers who provided obstetrical and pre-natal care and treatment to the Claimant, Andrea Lane, including, but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., were each acting as the real and/or apparent agents, servants and/or employees of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC.

16. The Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, through its real and/or apparent agents, servants and/or employees,

including, but not limited to, Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., owed to the Claimants a duty to exercise that degree of care, skill and judgment ordinarily expected of a reasonably competent medical corporation practicing in the medical specialties of obstetrics and maternal/fetal medicine in the same or similar circumstances; that duty included the proper acquisition and interpretation of clinical, radiologic, laboratory, pathologic and diagnostic information and data; the prompt performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Claimant, Andrea Lane, and/or her baby; the prompt employment of appropriate care and treatments to correct such condition(s) and the duty of appropriate notification to the Claimant, Andrea Lane, of the various alternatives and risks involved in various modalities of treatment and delivery.

17. On or about June 26, 2015, the Claimant, Andrea Lane, came under the care and treatment of Defendant/Health Care Provider Teresa Hoffman, M.D. & Associates, LLC, for the provision of obstetrical medical care attendant to her pregnancy with Donovan Elijah Martinez, deceased.

18. The Claimants aver that, as a result of the inadequate and inappropriate management of her pregnancy by the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., the Claimant, Andrea Lane, suffered the untreated and unmitigated progression of severe pre-eclampsia, eclampsia, eclamptic seizures and the attendant death of her baby.

19. The Claimants further aver that during the course of Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC's, obstetrical care and treatment of the Claimant, Andrea Lane, the Claimant suffered significant weight gain, the development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of her last prenatal visit on 11/16/15 at which time the Claimant was also reported to be complaining of upper gastric abdominal pain.

20. The Claimants further aver that, on or about November 18, 2015, the Claimant, Andrea Lane, was observed to be exhibiting seizure activity. An ambulance was called and the Claimant was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was eventually delivered dead via Cytotec induced vaginal delivery on November 18, 2015. The Claimant, Andrea Lane, was diagnosed with severe pre-eclampsia/eclampsia directly causing the death of her baby and grievous injury and harm to herself.

21. The Claimants further aver that, as a result of the inadequate, inappropriate and negligent medical and nursing care, treatment and management of Andrea Lane's prenatal care by the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its agents, servants and/or employees, the Claimant, Andrea Lane, was severely injured and damaged and her baby, Donovan Elijah Martinez, died.

22. The Claimants further aver that the injuries, damages and losses complained of by them were due to the negligent and careless acts and omissions of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually

and by and through its real and/or apparent agents, servants and employees, who breached their aforementioned duties to the Claimants.

23. The negligent and careless acts and omissions of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, include, but are not limited to:

- a. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the condition of the Claimant, Andrea Lane, and/or that of her baby;
- b. Failing to diagnose such conditions carefully;
- c. Failing to employ appropriate treatments and procedures to correct such conditions;
- d. Failing to carefully and thoroughly evaluate the effects of the chosen treatments;
- e. Failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Claimant's pregnancy with Donovan Elijah Martinez (deceased);
- f. Failing to expeditiously and reasonably monitor and treat the Claimant, Andrea Lane, for pre-eclampsia/eclampsia; pre-eclampsia
- g. Failing to reasonably advise the Claimant of the signs, symptoms and the maternal and fetal consequences associated with the development of pre-eclampsia and eclampsia an; pre-eclampsia
- h. Being otherwise careless and negligent.

24. The Claimants further aver that, as a result of the negligent and careless acts and omissions of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually and by and through its duly authorized agents, servants and/or employees, the Claimant, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental

anguish, unnecessary procedures, the loss of her viable baby, Donovan Elijah Martinez, and has otherwise been injured and damaged.

25. The Claimants further aver that, as a result of the negligent and careless acts and omissions of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually, and through its duly authorized agents, servants and/or employees, the Claimant, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

26. The Claimants further aver that, as a result of the negligence of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its duly authorized agents, servants and/or employees, the Claimant, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

27. The Claimants further aver that all of the injuries, damages and losses complained of by them, and the death of their son, Donovan Elijah Martinez, were caused by the negligence of the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Claimant contributing thereto.

WHEREFORE, this claim is brought by the Claimants, Andrea Lane, against the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, for an

amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT II
(Informed Consent – Teresa Hoffman, M.D. & Associates, LLC)

The Claimant, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 27 of this Statement of Claim as though fully set forth herein.

28. The Claimants further aver that, the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its real and/or apparent agents, servants and/or employees, owed to the Claimant, Andrea Lane, the appropriate and timely notification to the Claimant of the various alternatives and risks involved in various modalities of monitoring, care and treatment including, but not limited to, the risks and benefits of inpatient hospitalization, of the treatment for developing pre-eclampsia and eclampsia with appropriate medications and the potential need for the preterm delivery of her viable baby and other available modalities for the monitoring, care and treatment of any progression in the development of pre-eclampsia and eclampsia.

29. The Claimants further aver that the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its real and/or apparent agents, servants and/or employees, failed to appropriately, timely and adequately obtain an informed consent from the Claimant, Andrea Lane, to its chosen course of pregnancy monitoring, management, care and treatment.

30. The Claimants further aver that, as a result of the failure by the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually, and by and through its duly authorized real and/or apparent agents, servants and/or employees, to obtain an informed consent, the Claimant, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her fetus, and has otherwise been injured and damaged.

31. The Claimants further aver that, as a result of the failure by the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, through its duly authorized real and/or apparent agents, servants and/or employees, to obtain an informed consent, the Claimant, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

32. The Claimants further aver that, as a result of the failure by the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, through its duly authorized real and/or apparent agents, servants and/or employees, to obtain an informed consent, the Claimant, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

33. The Claimants further aver that, as a result of the failure by the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually,

and by and through its duly authorized real and/or apparent agents, servants and/or employees, to obtain an informed consent, the Claimant, Andrea Lane, has been forced to incur and in the future will continue to incur, expenses for the medical care, medicines, rehabilitation costs and related damages and expenses.

34. The Claimants further aver that all of the injuries and damages complained of by her were caused by the failure to obtain an informed consent by the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, individually and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Claimant contributing thereto.

WHEREFORE, this claim is brought by the Claimants, Andrea Lane, against the Defendant/Health Care Provider, Teresa Hoffman, M.D. & Associates, LLC, for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT III
(Negligence – Mercy Medical Center, Inc.)

The Claimant, Andrea Lane, realleges, adopts and incorporates by reference paragraphs 1 through 34 of this Statement of Claim as though fully set forth herein.

35. At all times of which the Claimant complains, the Defendant/Health Care Provider, Mercy Medical Center, Inc., was licensed to provide obstetrical medical services in the State of Maryland and represented to the public and to the Claimants possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent medical corporation practicing in the medical specialty of obstetrics.

36. At all times of which the Claimant complains, Remya Arul, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Medical Center, Inc.

37. At all times of which the Claimant complains, Janna Mudd, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Medical Center, Inc.

38. At all times of which the Claimant complains, Teresa Hoffman, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Medical Center, Inc.

39. At all times of which the Claimant complains, Tracie Cox, CNM, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Medical Center, Inc.

40. At all times of which the Claimant complains, Erika Nichelson, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Medical Center, Inc.

41. At all times of which the Claimant complains, the individual Health Care Providers who provided obstetrical and labor and delivery care and treatment to the Claimant, including, but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., were each acting as the real and/or apparent agents, servants and/or employees of the Defendant/Health Care Provider, Mercy Medical Center, Inc.

42. The Defendant/Health Care Provider, Mercy Medical Center, Inc., through its real and/or apparent agents, servants and/or employees, including but not limited to

Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., owed to the Claimant a duty to exercise that degree of care, skill and judgment ordinarily expected of a reasonably competent medical corporation practicing in the medical specialties of obstetrics and maternal/fetal medicine in the same or similar circumstances; that duty included the proper acquisition and interpretation of clinical, radiologic, laboratory, pathologic and diagnostic information and data; the prompt performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Claimant, Andrea Lane; the prompt employment of appropriate care and treatments to correct such condition(s) and the duty of appropriate notification to the Claimant, Andrea Lane, of the various alternatives and risks involved in various modalities of treatment and delivery.

43. On or about June 26, 2015, Claimant Andrea Lane, came under the care and treatment of Defendant/Health Care Provider Mercy Medical Center, Inc., for the provision of obstetrical medical care attendant to her pregnancy with Donovan Elijah Martinez.

44. The Claimant further avers that, as a result of the inadequate and inappropriate management of her pregnancy by the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., the Claimant, Andrea Lane, suffered progression of severe eclampsia, seizure, and loss of her fetus.

45. During the course of Defendant/Health Care Provider, Mercy Medical Center, Inc.'s treatment of Ms. Lane, Ms. Lane suffered significant weight gain, the

development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of the last prenatal visit on 11/16/15 at which time the patient was also reported to be complaining of upper abdominal pain. Despite these findings, Claimant Andrea Lane was not admitted to the hospital or scheduled to be admitted to the hospital for further evaluation or treatment of pre-eclampsia/eclampsia.

46. The Claimant further avers that on or about November 18, 2015, Ms. Lane was observed to be exhibiting seizure-like activity. An ambulance was called and Ms. Lane was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was delivered via Cytotec induced vaginal delivery on November 18, 2015. Ms. Lane was diagnosed with pre-eclampsia/eclampsia to which the fetal death in utero was attributed.

47. The Claimant further avers that, as a result of the inadequate, inappropriate and negligent medical and nursing care, treatment and management of Andrea Lane's prenatal care by the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its agents, servants and/or employees, the Claimant, Andrea Lane, was severely injured and damaged.

48. The Claimant further avers that the injuries, damages and losses complained of by her were due to the negligent and careless acts and omissions of the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its real and/or apparent agents, servants and employees, who breached their aforementioned duties to the Claimant, Andrea Lane.

49. The negligent and careless acts and omissions of the Defendant/Health Care Provider, Teresa Hoffman, M.D., & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, include, but are not limited to:

- a. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the condition of the Claimant, Andrea Lane;
- b. Failing to diagnose such conditions carefully;
- c. Failing to employ appropriate treatments and procedures to correct such conditions;
- d. Failing to carefully and thoroughly evaluate the effects of the chosen treatments;
- e. Failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Claimant's pregnancy with Donovan Elijah Martinez (deceased);
- f. Failing to admit Claimant Andrea Lane for monitoring and treatment of severe pre-eclampsia;
- g. Failing to prescribe and administer anti-seizure prophylaxis medication;
- h. Failing to advise Claimant of the risks and benefits of treatment of pre-eclampsia and eclampsia;
- i. being otherwise careless and negligent in the management of developing signs and symptoms of pre-eclampsia and eclampsia.

50. The Claimant, Andrea Lane, further avers that, as a result of the negligent and careless acts and omissions of the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Claimant, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental

anguish, unnecessary procedures, the loss of her viable fetus Donovan Elijah Martinez, and has otherwise been injured and damaged.

51. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Medical Center, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

52. The Claimant further avers that, as a result of the negligence of the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Claimant, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

53. The Claimant, Andrea Lane, further avers that all of the injuries, damages and losses complained of by her were caused by the negligence of the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its duly authorized agent, servants and/or employees, without any negligence or want of due care by the Claimant contributing thereto.

WHEREFORE, this claim is brought by the Claimant, Andrea Lane, against the Defendant/Health Care Provider, Mercy Medical Center, Inc., for an amount in excess of

the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT IV
(Informed Consent – Mercy Medical Center, Inc.)

The Claimant, Andrea Lane, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 53 of this Statement of Claim as though fully set forth herein.

54. The Defendant/Health Care Provider, Mercy Medical Center, Inc., owed to the Claimant, Andrea Lane, the duty of appropriate and timely notification to the Claimant of the various alternatives and risks involved in various modalities of treatment and delivery, including, but not limited to, the risks and benefits of treatment of pre-eclampsia with seizure prophylaxis medications, delivery of her preterm fetus, and/or hospital admission for close monitoring and treatment of her signs of symptoms of pre-eclampsia and eclampsia.

55. The Claimant further avers that the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its real and/or apparent agents, servants and/or employees, was negligent in failing to appropriately, timely and adequately obtain an informed consent from the Claimant, Andrea Lane, to its chosen course of pregnancy management, treatment and delivery, and was otherwise negligent.

56. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its duly authorized real and/or apparent agents, servants

and/or employees, the Claimant, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her fetus, and has otherwise been injured and damaged.

57. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Medical Center, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

58. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Medical Center, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

59. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, has been forced to incur and in the future will continue to incur, expenses for the medical care, medicines, rehabilitation costs and related damages and expenses.

60. The Claimant further avers that all of the injuries and damages complained of by her were caused by the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Medical Center, Inc., individually and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Claimant contributing thereto.

WHEREFORE, this claim is brought by the Claimant, Andrea Lane, against the Defendant/Health Care Provider, Mercy Medical Center, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT V
(Negligence – St. Paul Specialists, Inc.)

The Claimant, Andrea Lane, realleges, adopts and incorporates by reference paragraphs 1 through 60 of this Statement of Claim as though fully set forth herein.

61. At all times of which the Claimant complains, the Defendant/Health Care Provider, St. Paul Specialists, Inc., was licensed to provide obstetrical medical services in the State of Maryland and represented to the public and to the Claimants possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent medical corporation practicing in the medical specialty of obstetrics.

62. At all times of which the Claimant complains, Remya Arul, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, St. Paul Specialists, Inc.

63. At all times of which the Claimant complains, Janna Mudd, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, St. Paul Specialists, Inc.

64. At all times of which the Claimant complains, Teresa Hoffman, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, St. Paul Specialists, Inc.

65. At all times of which the Claimant complains, Tracie Cox, CNM, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, St. Paul Specialists, Inc.

66. At all times of which the Claimant complains, Erika Nichelson, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, St. Paul Specialists, Inc.

67. At all times of which the Claimant complains, the individual Health Care Providers who provided obstetrical and labor and delivery care and treatment to the Claimant, including, but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., were each acting as the real and/or apparent agents, servants and/or employees of the Defendant/Health Care Provider, St. Paul Specialists, Inc.

68. The Defendant/Health Care Provider, St. Paul Specialists, Inc., through its real and/or apparent agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., owed to the Claimant a duty to exercise that degree of care, skill and judgment ordinarily expected of a reasonably competent medical corporation practicing in the medical specialties of obstetrics and maternal/fetal medicine in the same or similar circumstances; that duty included the proper acquisition and interpretation of clinical, radiologic, laboratory, pathologic and diagnostic information and data; the prompt

performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Claimant, Andrea Lane; the prompt employment of appropriate care and treatments to correct such condition(s) and the duty of appropriate notification to the Claimant, Andrea Lane, of the various alternatives and risks involved in various modalities of treatment and delivery.

69. On or about June 26, 2015, Claimant Andrea Lane, came under the care and treatment of Defendant/Health Care Provider St. Paul Specialists, Inc., for the provision of obstetrical medical care attendant to her pregnancy with Donovan Elijah Martinez.

70. The Claimant further avers that, as a result of the inadequate and inappropriate management of her pregnancy by the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., the Claimant, Andrea Lane, suffered progression of severe eclampsia, seizure, and loss of her fetus.

71. During the course of Defendant/Health Care Provider, St. Paul Specialists, Inc.'s treatment of Ms. Lane, Ms. Lane suffered significant weight gain, the development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of the last prenatal visit on 11/16/15 at which time the patient was also reported to be complaining of upper abdominal pain. Despite these findings, Claimant Andrea Lane was not admitted to the hospital or scheduled to be admitted to the hospital for further evaluation or treatment of pre-eclampsia/eclampsia.

72. The Claimant further avers that on or about November 18, 2015, Ms. Lane was observed to be exhibiting seizure-like activity. An ambulance was called and Ms. Lane was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was delivered via Cytotec induced vaginal delivery on November 18, 2015. Ms. Lane was diagnosed with pre-eclampsia/eclampsia to which the fetal death in utero was attributed.

73. The Claimant further avers that, as a result of the inadequate, inappropriate and negligent medical and nursing care, treatment and management of Andrea Lane's prenatal care by the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its agents, servants and/or employees, the Claimant, Andrea Lane, was severely injured and damaged.

74. The Claimant further avers that the injuries, damages and losses complained of by her were due to the negligent and careless acts and omissions of the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its real and/or apparent agents, servants and employees, who breached their aforementioned duties to the Claimant, Andrea Lane.

75. The negligent and careless acts and omissions of the Defendant/Health Care Provider, Teresa Hoffman, M.D., & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, include, but are not limited to:

- a. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the condition of the Claimant, Andrea Lane;
- b. Failing to diagnose such conditions carefully;

- c. Failing to employ appropriate treatments and procedures to correct such conditions;
- d. Failing to carefully and thoroughly evaluate the effects of the chosen treatments;
- e. Failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Claimant's pregnancy with Donovan Elijah Martinez (deceased);
- f. Failing to admit Claimant Andrea Lane for monitoring and treatment of severe pre-eclampsia;
- g. Failing to prescribe and administer anti-seizure prophylaxis medication;
- h. Failing to advise Claimant of the risks and benefits of treatment of pre-eclampsia and eclampsia;
- i. being otherwise careless and negligent in the management of developing signs and symptoms of pre-eclampsia and eclampsia.

76. The Claimant, Andrea Lane, further avers that, as a result of the negligent and careless acts and omissions of the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Claimant, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her viable fetus Donovan Elijah Martinez, and has otherwise been injured and damaged.

77. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, St. Paul Specialists, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal

vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

78. The Claimant further avers that, as a result of the negligence of the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Claimant, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

79. The Claimant, Andrea Lane, further avers that all of the injuries, damages and losses complained of by her were caused by the negligence of the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its duly authorized agent, servants and/or employees, without any negligence or want of due care by the Claimant contributing thereto.

WHEREFORE, this claim is brought by the Claimant, Andrea Lane, against the Defendant/Health Care Provider, St. Paul Specialists, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT VI
(Informed Consent – St. Paul Specialists, Inc.)

The Claimant, Andrea Lane, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 79 of this Statement of Claim as though fully set forth herein.

80. The Defendant/Health Care Provider, St. Paul Specialists, Inc., owed to the Claimant, Andrea Lane, the duty of appropriate and timely notification to the Claimant of the various alternatives and risks involved in various modalities of treatment and delivery, including, but not limited to, the risks and benefits of treatment of pre-eclampsia with seizure prophylaxis medications, delivery of her preterm fetus, and/or hospital admission for close monitoring and treatment of her signs of symptoms of pre-eclampsia and eclampsia.

81. The Claimant further avers that the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its real and/or apparent agents, servants and/or employees, was negligent in failing to appropriately, timely and adequately obtain an informed consent from the Claimant, Andrea Lane, to its chosen course of pregnancy management, treatment and delivery, and was otherwise negligent.

82. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her fetus, and has otherwise been injured and damaged.

83. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, St. Paul Specialists, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was confined to hospitals for the treatment of the injuries which

she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

84. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, St. Paul Specialists, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

85. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, has been forced to incur and in the future will continue to incur, expenses for the medical care, medicines, rehabilitation costs and related damages and expenses.

86. The Claimant further avers that all of the injuries and damages complained of by her were caused by the failure to obtain an informed consent by the Defendant/Health Care Provider, St. Paul Specialists, Inc., individually and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Claimant contributing thereto.

WHEREFORE, this claim is brought by the Claimant, Andrea Lane, against the Defendant/Health Care Provider, St. Paul Specialists, Inc., for an amount in excess of the

minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT VII
(Negligence – Mercy Health Services, Inc.)

The Claimant, Andrea Lane, realleges, adopts and incorporates by reference paragraphs 1 through 86 of this Statement of Claim as though fully set forth herein.

87. At all times of which the Claimant complains, the Defendant/Health Care Provider, Mercy Health Services, Inc., was licensed to provide obstetrical medical services in the State of Maryland and represented to the public and to the Claimants possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent medical corporation practicing in the medical specialty of obstetrics.

88. At all times of which the Claimant complains, Remya Arul, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Health Services, Inc.

89. At all times of which the Claimant complains, Janna Mudd, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Health Services, Inc.

90. At all times of which the Claimant complains, Teresa Hoffman, M.D., was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Health Services, Inc.

91. At all times of which the Claimant complains, Tracie Cox, CNM, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Health Services, Inc.

92. At all times of which the Claimant complains, Erika Nichelson, M.D, was acting as a real, apparent and/or ostensible agent, servant and/or employee of the Defendant/Health Care Provider, Mercy Health Services, Inc.

93. At all times of which the Claimant complains, the individual Health Care Providers who provided obstetrical and labor and delivery care and treatment to the Claimant, including, but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., were each acting as the real and/or apparent agents, servants and/or employees of the Defendant/Health Care Provider, Mercy Health Services, Inc.

94. The Defendant/Health Care Provider, Mercy Health Services, Inc., through its real and/or apparent agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., owed to the Claimant a duty to exercise that degree of care, skill and judgment ordinarily expected of a reasonably competent medical corporation practicing in the medical specialties of obstetrics and maternal/fetal medicine in the same or similar circumstances; that duty included the proper acquisition and interpretation of clinical, radiologic, laboratory, pathologic and diagnostic information and data; the prompt performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Claimant, Andrea Lane; the prompt employment of appropriate care and treatments to correct such condition(s) and the duty of appropriate notification to the Claimant, Andrea Lane, of the various alternatives and risks involved in various modalities of treatment and delivery.

95. On or about June 26, 2015, Claimant Andrea Lane, came under the care and treatment of Defendant/Health Care Provider Mercy Health Services, Inc., for the provision of obstetrical medical care attendant to her pregnancy with Donovan Elijah Martinez.

96. The Claimant further avers that, as a result of the inadequate and inappropriate management of her pregnancy by the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its agents, servants and/or employees, including but not limited to Remya Arul, M.D., Janna Mudd, M.D., Teresa Hoffman, M.D., Tracie Cox, CNM and Erika Nichelson, M.D., the Claimant, Andrea Lane, suffered progression of severe eclampsia, seizure, and loss of her fetus.

97. During the course of Defendant/Health Care Provider, Mercy Health Services, Inc.'s treatment of Ms. Lane, Ms. Lane suffered significant weight gain, the development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of the last prenatal visit on 11/16/15 at which time the patient was also reported to be complaining of upper abdominal pain. Despite these findings, Claimant Andrea Lane was not admitted to the hospital or scheduled to be admitted to the hospital for further evaluation or treatment of pre-eclampsia/eclampsia.

98. The Claimant further avers that on or about November 18, 2015, Ms. Lane was observed to be exhibiting seizure-like activity. An ambulance was called and Ms. Lane was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was delivered via Cytotec induced vaginal delivery on

November 18, 2015. Ms. Lane was diagnosed with pre-eclampsia/eclampsia to which the fetal death in utero was attributed.

99. The Claimant further avers that, as a result of the inadequate, inappropriate and negligent medical and nursing care, treatment and management of Andrea Lane's prenatal care by the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its agents, servants and/or employees, the Claimant, Andrea Lane, was severely injured and damaged.

100. The Claimant further avers that the injuries, damages and losses complained of by her were due to the negligent and careless acts and omissions of the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its real and/or apparent agents, servants and employees, who breached their aforementioned duties to the Claimant, Andrea Lane.

101. The negligent and careless acts and omissions of the Defendant/Health Care Provider, Teresa Hoffman, M.D., & Associates, LLC, individually and by and through its real and/or apparent agents, servants and employees, include, but are not limited to:

- a. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the condition of the Claimant, Andrea Lane;
- b. Failing to diagnose such conditions carefully;
- c. Failing to employ appropriate treatments and procedures to correct such conditions;
- d. Failing to carefully and thoroughly evaluate the effects of the chosen treatments;
- e. Failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Claimant's pregnancy with Donovan Elijah Martinez (deceased);

- f. Failing to admit Claimant Andrea Lane for monitoring and treatment of severe pre-eclampsia;
- g. Failing to prescribe and administer anti-seizure prophylaxis medication;
- h. Failing to advise Claimant of the risks and benefits of treatment of pre-eclampsia and eclampsia;
- i. being otherwise careless and negligent in the management of developing signs and symptoms of pre-eclampsia and eclampsia.

102. The Claimant, Andrea Lane, further avers that, as a result of the negligent and careless acts and omissions of the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Claimant, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her viable fetus Donovan Elijah Martinez, and has otherwise been injured and damaged.

103. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Health Services, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

104. The Claimant further avers that, as a result of the negligence of the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its duly authorized agent, servants and/or employees, the Claimant, Andrea Lane,

was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

105. The Claimant, Andrea Lane, further avers that all of the injuries, damages and losses complained of by her were caused by the negligence of the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its duly authorized agent, servants and/or employees, without any negligence or want of due care by the Claimant contributing thereto.

WHEREFORE, this claim is brought by the Claimant, Andrea Lane, against the Defendant/Health Care Provider, Mercy Health Services, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT VIII
(Informed Consent – Mercy Health Services, Inc.)

The Claimant, Andrea Lane, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 105 of this Statement of Claim as though fully set forth herein.

106. The Defendant/Health Care Provider, Mercy Health Services, Inc., owed to the Claimant, Andrea Lane, the duty of appropriate and timely notification to the Claimant of the various alternatives and risks involved in various modalities of treatment and delivery, including, but not limited to, the risks and benefits of treatment of pre-eclampsia with seizure prophylaxis medications, delivery of her preterm fetus, and/or

hospital admission for close monitoring and treatment of her signs of symptoms of pre-eclampsia and eclampsia.

107. The Claimant further avers that the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its real and/or apparent agents, servants and/or employees, was negligent in failing to appropriately, timely and adequately obtain an informed consent from the Claimant, Andrea Lane, to its chosen course of pregnancy management, treatment and delivery, and was otherwise negligent.

108. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, experienced a severe shock to her nerves and nervous system, the loss of enjoyment of life, physical and emotional pain, mental anguish, unnecessary procedures, the loss of her fetus, and has otherwise been injured and damaged.

109. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Health Services, Inc., through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was confined to hospitals for the treatment of the injuries which she sustained, and she has been and will continue to be prevented from her normal vocation, activities and pursuits as a result of the injuries, damages and losses complained of.

110. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Health Services, Inc.,

through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, was and will be required to incur great expenses for the medical care and hospitalizations required for the treatment of and attempted remediation of the consequences of the injuries, damages and losses which she has sustained.

111. The Claimant further avers that, as a result of the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its duly authorized real and/or apparent agents, servants and/or employees, the Claimant, Andrea Lane, has been forced to incur and in the future will continue to incur, expenses for the medical care, medicines, rehabilitation costs and related damages and expenses.

112. The Claimant further avers that all of the injuries and damages complained of by her were caused by the failure to obtain an informed consent by the Defendant/Health Care Provider, Mercy Health Services, Inc., individually and by and through its duly authorized agents, servants and/or employees, without any negligence or want of due care by the Claimant contributing thereto.

WHEREFORE, this claim is brought by the Claimant, Andrea Lane, against the Defendant/Health Care Provider, Mercy Health Services, Inc., for an amount in excess of the minimum jurisdiction of the Health Care Alternative Dispute Resolution Office, and such other and further relief.

COUNT IX

(Wrongful Death- Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc.)

The Claimants, Andrea Lane, as surviving mother, and Donovan C. Martinez, as surviving father, of Donovan Elijah Martinez, deceased, repeats, realleges, adopts and

incorporates by reference paragraphs 1 through 112 of this Statement of Claim as though fully set forth herein.

113. This action is timely brought and joins and includes all persons entitled to recover under the Wrongful Death Subtitle, Md. Cts. & Jud. Procs. Code Ann. §§ 3-901 et seq., for the wrongful death of Donovan Elijah Martinez.

114. Claimant Andrea Lane is the surviving mother of Donovan Elijah Martinez, deceased. Donovan C. Martinez is the surviving father of Donovan Elijah Martinez. As such, the Claimants are authorized and empowered to bring this action in accordance with Md. Cts. & Jud. Procs. Code Ann. §§ 3-901 et seq.

115. As a result of the negligence of the Defendants/Health Care Providers, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., through their real, apparent and/or ostensible agents, servants and/or employees, the Claimant Andrea Lane has suffered, is suffering and will continue to suffer, mental anguish, emotional pain and suffering, loss of society, loss of companionship, loss of comfort, loss of protection, loss of affection, loss of care, loss of attention, loss of advice, loss of counsel, and loss of solatium in the wrongful death of her son, Donovan Elijah Martinez.

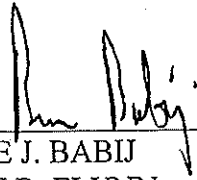
116. As a result of the negligence of the Defendants/Health Care Providers, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., through their real, apparent and/or ostensible agents, servants and/or employees, the Claimant Donovan Martinez has suffered, is suffering and will continue to suffer, mental anguish, emotional pain and suffering, loss of society, loss of companionship, loss of comfort, loss of protection, loss

of affection, loss of care, loss of attention, loss of advice, loss of counsel, and loss of solatium in the wrongful death of his son, Donovan Elijah Martinez.

117. As a further result of the negligence of the Defendants/Health Care Providers, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., through their real, apparent and/or ostensible agents, servants and/or employees, the Claimants Andrea Lane and Donovan C. Martinez was compelled to incur hospital, medical and funeral expenses for Donovan Elijah Martinez, and was otherwise injured and damaged.

118. All of the injuries and damages complained of were caused by the negligence of the Defendants/Health Care Providers, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., by and through their respective real, apparent and/or ostensible agents, servants and/or employees, without any negligence by the Claimants and/or the Claimants' decedent contributing thereto.

WHEREFORE, the Claimants, Andrea Lane, and Donovan C. Martinez, bring this claim against the Defendants/Health Care Providers, Teresa Hoffman, M.D. and Associates, LLC, Mercy Medical Center, Inc., St. Paul Place Specialists, LLC, and Mercy Health Services, Inc., in an amount in excess of the minimum jurisdiction for the Health Care Alternative Dispute Resolution Office.



BRUCE J. BABIJ
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(410) 308-1600
Attorneys for Claimants

EXHIBIT 2

ANDREA LANE

Claimant

vs.

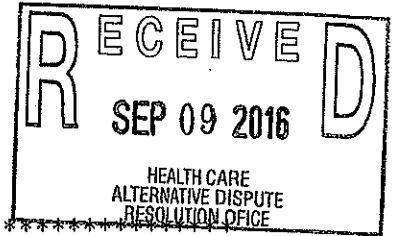
TERESA HOFFMAN, M.D. &
ASSOCIATES, LLC, et al.

Defendants

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IN THE HEALTH CARE
ALTERNATIVE DISPUTE
RESOLUTION OFFICE

Case #



CERTIFICATE OF MERIT AND REPORT

I, Harlan Giles, M.D., do hereby certify, affirm and attest that:

1. In my professional opinion there were violations of the applicable standards of care by the Defendants/Healthcare Providers, Teresa Hoffman, M.D. and Associates, LLC; Mercy Medical Center, Inc.; St. Paul Place Specialists, Inc.; and Mercy Health Services, Inc., individually, and by and through their real, apparent and/or ostensible agents, servants and/or employees, who were responsible for the management and provision of prenatal obstetrical care to the Claimant, Andrea Lane, attendant to her pregnancy in the year 2015 and who include, but are not necessarily limited to, Remya Arul, M.D.; Janna Mudd, M.D.; Teresa Hoffman, M.D.; Tracy Cox, CNM; and/or Erika Nichelson, M.D.

2. It is my further professional opinion that, as a direct and proximate cause of the violations of the applicable standards of care by the Defendants/Healthcare Providers, Teresa Hoffman, M.D. and Associates, LLC; Mercy Medical Center, Inc.; St. Paul Place Specialists, Inc.; and Mercy Health Services, Inc., individually, and by and through their real, apparent and/or ostensible agents, servants and/or employees, including, but not

necessarily limited to, those identified above, the Claimant, Andrea Lane, was injured, and her baby died.

3. I further certify that I have clinical experience, that I have provided consultation relating to clinical practice, and/or that I have taught medicine in the field of obstetrics and maternal-fetal medicine within five (5) years of the date of the above-identified acts or omissions giving rise to this claim.

4. I further certify that I am Board-certified in obstetrics and gynecology and maternal-fetal medicine and/or that I have taught medicine in the specialties of obstetrics and gynecology and/or in a related field of healthcare.

5. I further certify that I do not devote annually more than 20% of my professional activities to activities that directly involve testimony in personal injury claims.



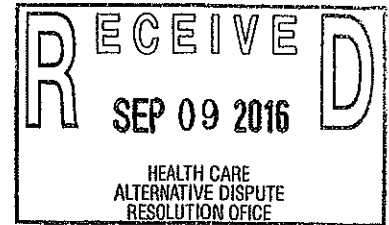
HARLAN GILES, M.D.

I hereby certify that the above Certificate of Merit and Report is true and correct to the best of my knowledge, information and belief.



HARLAN GILES, M.D.

REPORT OF HARLAN GILES, M.D.



RE: Andrea Lane

TO WHOM IT MAY CONCERN:

I have reviewed the relevant medical records pertaining to the obstetrical care provided to the Claimant, Andrea Lane, during the course of her pregnancy in the year 2015. I have also reviewed the medical records generated after Ms. Lane's admission to the Sinai Hospital of Baltimore, 2401 West Belvedere Avenue, Baltimore, MD 21215, commencing on November 18, 2015.

Based upon the information presently available to me, it is my understanding that the pre-natal obstetrical medical care rendered to the Claimant, Andrea Lane, was provided by the Healthcare Providers/Defendants, Teresa Hoffman, M.D. and Associates, LLC; Mercy Medical Center, Inc.; St. Paul Place Specialists, Inc.; and/or Mercy Health Services, Inc., individually, and by and through their real, apparent and/or ostensible agents, servants and/or employees, including, but not necessarily limited to, Remya Arul, M.D.; Janna Mudd, M.D.; Teresa Hoffman, M.D.; Tracy Cox, CNM; and Erika Nichelson, M.D.

Based upon the information presently available to me, it is my opinion that the Healthcare Providers/Defendants, Teresa Hoffman, M.D. and Associates, LLC; Mercy Medical Center, Inc.; St. Paul Place Specialists, Inc.; and/or Mercy Health Services, Inc., individually, and by and through their real, apparent and/or ostensible agents, servants and/or employees, including, but not necessarily limited to, those identified above, violated applicable standards of care in their management and oversight of the pre-natal care provided to the Claimant, Andrea Lane.

Based upon the information presently available to me, it is my further opinion that the Healthcare Providers/Defendants, Teresa Hoffman, M.D. and Associates, LLC; Mercy Medical Center, Inc.; St. Paul Place Specialists, Inc.; and/or Mercy Health Services, Inc., individually, and by and through their real, apparent and/or ostensible agents, servants and/or employees, including, but not necessarily limited to, those identified above, violated applicable standards of care by failing reasonably and expeditiously to assess and appropriately intervene in response to signs and symptoms of developing pre-eclampsia/eclampsia during the course of the Claimant's pregnancy in the year 2015.

In support of my opinions, the medical records reviewed by me reflect that Ms. Lane's prenatal course was significant for assessments of significant weight gain, the development of "2+" edema and increasing proteinuria as measured by dipstick, reportedly reaching +++ at time of the last prenatal visit on 11/16/15 at which time the patient was also reported to be complaining of upper abdominal pain. The patient was not admitted or scheduled to be admitted to the hospital for further evaluation or treatment.

The medical records reviewed by me further reflect that, on the morning of 11/18/15, Ms. Lane was observed to be exhibiting seizure-like activity. An ambulance was called and Ms. Lane was emergently transported to the Sinai Hospital of Baltimore. An ultrasound performed upon admission confirmed a fetal death in utero at approximately 28 6/7 weeks gestation. The deceased fetus was delivered via Cytotec induced vaginal delivery on 11/18/15. Ms. Lane was diagnosed with pre-eclampsia/eclampsia to which the fetal death in utero was attributed.

It is my further opinion that, as a direct and proximate cause of the violations of the applicable standards of care by the Healthcare Providers/Defendants, Teresa Hoffman, M.D. and Associates, LLC; Mercy Medical Center, Inc.; St. Paul Place Specialists, Inc.; and/or Mercy Health Services, Inc., individually, and by and through their real, apparent and/or ostensible agents, servants and/or employees, including, but not necessarily limited to, those identified above, the Claimant, Andrea Lane, suffered injury and her baby died.

All of the opinions expressed by me are held to a reasonable degree of medical probability based upon the information presently available to me.

I reserve the right to amend or alter my opinions, if necessary, based upon the provision of additional information.

I further certify that I have clinical experience, that I have provided consultation relating to clinical practice, and/or that I have taught medicine in the fields of obstetrics and gynecology and maternal-fetal medicine within five (5) years of the date of the above-identified acts or omissions giving rise to this claim.

I further certify that I am Board-certified in obstetrics and gynecology and maternal-fetal medicine and/or that I have taught medicine in those specialties or a related field of health care.

Further, I do not spend more than 20% of my professional time involving testimony in personal injury cases.

Very truly yours,



HARLAN GILES, M.D.

EXHIBIT 3

ANDREA LANE, et al.

Claimants

vs.

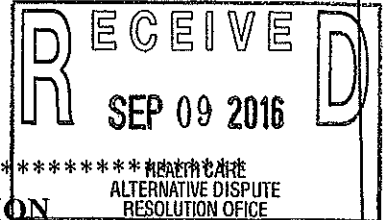
TERESA HOFFMAN, M.D. &
ASSOCIATES, LLC, et al.

Defendants

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IN THE HEALTH CARE
ALTERNATIVE DISPUTE
RESOLUTION OFFICE

Case #



***** HEALTH CARE ALTERNATIVE DISPUTE RESOLUTION OFFICE *****

ELECTION FOR WAIVER OF ARBITRATION

The Claimants, Andrea Lane and Donovan Martinez, by and through their attorneys, Bruce J. Babij, Ellen B. Flynn, and Dugan, Babij, Tolley & Kohler, LLC, file this Election for Waiver of Arbitration pursuant to the Annotated Code of Maryland, Courts and Judicial Proceedings Article, Section 3-2A-06B and for reasons in support thereof, respectfully represent:

1. The Claimants hereto have elected to waive arbitration in the above captioned case.
2. The Claimants filed their Certificate of Merit and Report pursuant to the Annotated Code of Maryland, Courts and Judicial Proceedings Article, Section 3-2A-04(b) with the Health Care Alternative Dispute Resolution Office of Maryland with their Statement of Claim.
3. That, after filing, this election shall be binding on all parties.

BRUCE J. BABIJ
ELLEN B. FLYNN
Dugan, Babij & Tolley, LLC
1966 Greenspring Drive, Suite 500
Timonium, Maryland 21093
(410) 308-1600
Attorneys for Claimants

ANDREA LANE, et al.
CARE

Claimants

vs.

TERESA HOFFMAN, M.D. &
ASSOCIATES, LLC, et al.

Defendants

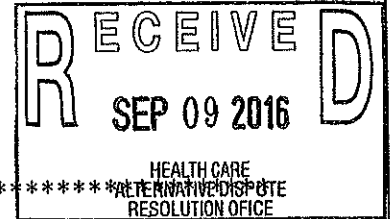
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IN THE HEALTH

ALTERNATIVE DISPUTE
RESOLUTION OFFICE

Case #

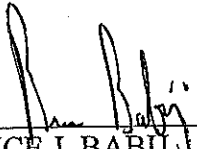
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***** HEALTH CARE ALTERNATIVE DISPUTE RESOLUTION OFFICE *****

CERTIFICATE OF SERVICE

I hereby certify that the Claimants' Certificate of Merit and Report and Election to Waive Arbitration will be simultaneously served with the Statement of Claim upon all Defendants in this matter.



BRUCE J. BABIJ
ELLEN B. FLYNN
Dugan, Babij & Tolley, LLC
1966 Greenspring Drive, Suite 500
Timonium, Maryland 21093
(410) 308-1600

Attorneys for Claimants

EXHIBIT 4

ANDREA LANE, *et al.*

Claimants

vs.

ST. PAUL PLACE SPECIALISTS, LLC, *et al.*

Health Care Providers

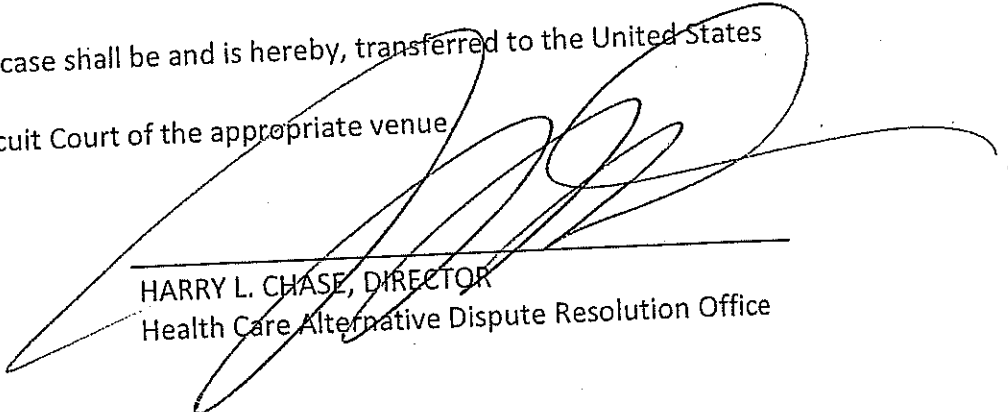
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BEFORE THE
HEALTH CARE
ALTERNATIVE DISPUTE
RESOLUTION OFFICE
HCA No.: 2016-446

ORDER OF TRANSFER

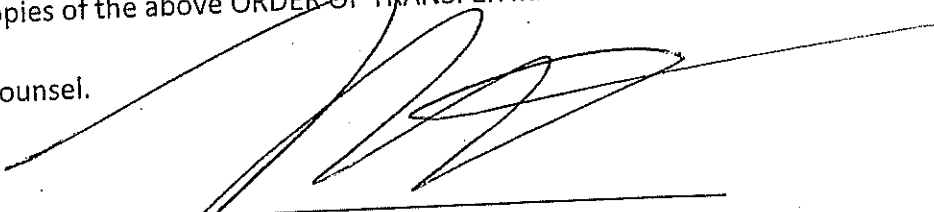
The Claimants, by and through counsel, having elected a Waiver of Arbitration under the provisions of Annotated Code of Maryland, Courts and Judicial Proceedings, Article, § 3-2A-06B, it is this 14 day of September, 2016, by the Health Care Alternative Dispute Resolution Office,

ORDERED, that this case shall be and is hereby, transferred to the United States District Court, or to the Circuit Court of the appropriate venue


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

2016 SEP 22 AM 10:18

2016 SEP 23 PM 12:22

Circuit Court for Baltimore City, Maryland

CIVIL DIV City/County

CIVIL DIVISION

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: [X] PLAINTIFF [] DEFENDANT CASE NUMBER (Clerk to insert)

CASE NAME: Andrea Lane, et al. vs. Teresa Hoffman, M.D. & Associates, LLC, et al. Plaintiff Defendant

JURY DEMAND: [X] Yes [] No Anticipated length of trial: hours or days

RELATED CASE PENDING? [] Yes [X] 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

Grid with categories: TORTS, LABOR, REAL PROPERTY, OTHER, A. TORTS, B. CONTRACTS, C. NONMONETARY. Includes checkboxes for Motor Tort, Workers' Comp, Judicial Sale, etc.

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 [X] No B. Arbitration [] Yes [X] No C. Settlement Conference [] Yes [X] No D. Neutral Evaluation [] Yes [X] 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.

Checkboxes for trial length: 1/2 day of trial or less, 1 day of trial time, 2 days of trial time, 3 days of trial time, More than 3 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 9/22/16

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. |

**DUGAN
BABIJ
TOLLEY
& KOHLER LLC**

Finding Answers.
Demanding Justice.



2016 SEP 23 PM 12:22

CIVIL DIVISION



ATTORNEYS AT LAW

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September 23, 2016

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‡ Admitted in DC † Admitted in PA
§ Admitted in NC ▲ Admitted in OH
• Admitted in CT ◄ Admitted in MN

Civil Clerk
Circuit Court for Baltimore City
Courthouse East, 111 N. Calvert Street
Baltimore, Maryland 21202
VIA HAND DELIVERY

RE: Andrea Lane, et al. v. St. Paul Place
Specialists, LLC, et al.

CIVIL DIVISION
SEP 23 12:22 PM '16

Dear Clerk:

Please accept the following for filing:

- 1) An original and four copies of the Case Information Report;
- 2) An original and four copies of the Complaint & Election for Jury Trial; and
- 4) A check in the amount of \$185.00 representing your filing fee.

Case: 24-C-16-005229
CV File New \$80.00
RIF-New Case \$30.00
APPEAR fee \$20.00
MLSC \$55.00
TOTAL \$185.00

Please note that the Defendants are to be served by **PRIVATE PROCESS**.
Therefore, please forward the Writs to me so that I can perfect service.

Please "date stamp" the additional copy, which is enclosed, and return it to the messenger to return to me.

Receipt #201609023167
CASHIER: REV CC8CX82
09/27/16 1:26pm

Thank you for your attention to this matter.

Sincerely,

Ellen B. Flynn
ELLEN B. FLYNN

EBF/mh
Enclosures