

KIA ROBERTS
3305 Croydon Road
Gwynn Oak, MD 21207

Plaintiff

v.

THE JOHNS HOPKINS HOSPITAL
600 North Wolfe Street
Baltimore, Maryland 21205

SERVE ON: Resident Agent
J. Daniel Shealer, Jr.
733 N. Broadway, Suite 102
Baltimore, Maryland 21205

and

JOHNS HOPKINS UNIVERSITY
d/b/a Johns Hopkins Medicine
Charles & 34th Street
Baltimore, Maryland 21214

SERVE ON: Resident Agent
Arthur P. Pineau
Interim General Counsel
3400 North Charles Street
113 Garland Hall
Baltimore, Maryland 21218

and

THE JOHNS HOPKINS HEALTH
SYSTEM CORPORATION
600 North Wolfe Street
Baltimore, Maryland 21205

SERVE ON: Resident Agent
J. Daniel Shealer, Jr.
733 N. Broadway, Suite 102
Baltimore, Maryland 21205

and

* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE CITY

* Case No.:
* 24-c-18-000959

RECEIVED
CIRCUIT COURT
BALTIMORE, MD
JAN 14 2025

JOHNS HOPKINS COMMUNITY *
PHYSICIANS, INC. *
733 North Broadway, BRB 102 *
Baltimore, MD 21205 *

SERVE ON: Resident Agent *
J. Daniel Shealer, Jr. *
733 N. Broadway, Suite 102 *
Baltimore, Maryland 21205 *

and *

TAMARA DESHAWN TERRY, M.D. *
Johns Hopkins Community Physicians *
1501 South Clinton Street *
Suite 200 *
Baltimore, MD 21224 *

Defendants *

RECEIVED
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CLERK OF COURT
COURT HOUSE
BALTIMORE, MD

COMPLAINT AND PRAYER FOR JURY TRIAL

The Plaintiff, Kia Roberts, by her attorneys, Henry E. Dugan, Jr., Alison D. Kohler, and Dugan, Babij, Tolley & Kohler, LLC, sues the Defendant, The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, The Johns Hopkins Health System Corporation, Johns Hopkins Community Physicians, Inc. and Tamara Deshawn Terry, M.D., and states:

1. This matter was filed with the Health Care Alternative Dispute Resolution Office of Maryland on or about December 1, 2017. A copy of the Statement of Claim is attached hereto as *Exhibit 1* and prayed to be taken as part hereof.

2. The Plaintiff filed a Certificate of Merit and Report of Martin Gubernick, M.D., with the Health Care Alternative Dispute Resolution Office of Maryland, on or about February

14, 20187. A copy of the Certificate of Merit and Report is attached hereto as *Exhibit 2* and prayed to be taken as part hereof.

3. On or about February 14, 2018, the Plaintiff filed a Notice of Election to Waive Arbitration, pursuant to Md. Cts. & Jud. Procs. Code Ann. § 3-2A-06A, in the Health Care Alternative Dispute Resolution Office of Maryland. A copy of the Notice of Election to Waive Arbitration is attached hereto as *Exhibit 3*, and prayed to be taken as part thereof.

4. On or about February 15, 2018, an Order of Transfer was issued by the Health Care Alternative Dispute Resolution Office, transferring this case to the Circuit Court for Baltimore City. A copy of the Order to Transfer is attached hereto as *Exhibit 4*, and prayed to be taken as part hereof.

5. These claims were properly filed in the Health Care Alternative Dispute Resolution Office as they exceed Thirty Thousand Dollars (\$30,000.00) in damages, and were properly waived out to the Circuit Court for Baltimore City pursuant to Md. Cts. & Jud. Procs. Code Ann. § 3-2A-06A. All conditions precedent to the filing of these claims have been met.

6. The Plaintiff relates back to, repeats, re-alleges, adopts and incorporates by reference the Statement of Claim filed with the Health Care Alternative Dispute Resolution Office on or about December 1, 2017.

PARTIES

7. The Plaintiff, Kia Roberts is an adult citizen of the State of Maryland, residing at 3305 Croydon Road, Gwynn Oak, MD 21207.

8. The Defendant, The Johns Hopkins Hospital, is a corporation organized and existing under the laws of the State of Maryland, with its principal place of business at 600 North Wolfe Street, Baltimore, Maryland 21205. At all relevant times, Johns Hopkins Hospital

owned and operated the hospital referred to as Johns Hopkins Hospital and was the employer and/or the actual and/or apparent principal of the physicians, residents, nurses, nurses aids, nurse anesthetists, physical therapists, occupational therapists and other health care providers staffing the hospital and providing medical, nursing, labor and delivery, anesthesia, pain management, and all other care to Kia Roberts during her hospitalization beginning on December 9, 2014, including without limitation, Tamara Deshawn Terry, M.D.

9. The Defendant, Johns Hopkins University d/b/a Johns Hopkins Medicine, is a corporation organized and existing under the laws of the State of Maryland, with its principal place of business at Charles and 34th Street, Baltimore, Maryland 21218. At all relevant times, Johns Hopkins University d/b/a Johns Hopkins Medicine was the employer and/or the actual and/or apparent principal of the physicians, residents and fellows staffing The Johns Hopkins Hospital and providing medical care to Kia Roberts during her hospitalization beginning on December 9, 2014, including without limitation, Tamara Deshawn Terry, M.D.

10. The Defendant, The Johns Hopkins Health System Corporation, is a corporation organized and existing under the laws of the State Maryland, with its principal place of business at 600 North Wolfe Street, Baltimore, Maryland 21205. At all relevant times, the Johns Hopkins Health System was the overarching corporation responsible for the running and management of Johns Hopkins Hospital and was the employer and/or the actual and/or apparent principal of the physicians, nurses, nurses aids, nurse anesthetists, physical therapists, occupational therapists and other health care providers staffing the hospital and providing medical, nursing, anesthesia, pain management and all other care to Kia Roberts during her hospitalization beginning on December 9, 2014, including without limitation, Tamara Deshawn Terry, M.D.

11. The Defendant, Johns Hopkins Community Health System, Inc., is a corporation organized and existing under the laws of the State Maryland, with its principal place of business at 733 North Broadway, BRB 102, Baltimore, Maryland 21205. At all relevant times, the Johns Hopkins Community Health System, Inc., was a corporation delivering community health care to members of the Johns Hopkins Community and was the employer and/or the actual and/or apparent principal of the physicians, nurses, nurses aids, nurse anesthetists, physical therapists, occupational therapists and other health care providers staffing the hospital and providing medical, nursing, anesthesia, pain management and all other care to Kia Roberts during her hospitalization beginning on December 9, 2014, including without limitation, Tamara Deshawn Terry, M.D.

12. Defendant Tamara Deshawn Terry, M.D., is an adult citizen of the State of Maryland, who currently and at all times complained of herein was and is licensed to practice medicine in the State of Maryland within the specialty of obstetrics and gynecology, and was and is carrying on a regular business in Baltimore City, Maryland, with her principal place of business at 1501 South Clinton Street, Suite 200, Baltimore, MD 21224. At all times complained of, Dr. Terry was acting as an agent, servant and/or employee, real, apparent and/or ostensible of the Defendants, The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc. and/or The Johns Hopkins Health System Corporation.

13. Hereinafter in this Complaint, the Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc. and The Johns Hopkins Health System Corporation, and Tamara Deshawn

Terry, M.D., individually and/or through their respective agents, servants and/or employees (both actual and apparent) will be collectively referred to as “the Defendants.”

AMOUNT OF CLAIM AND VENUE

14. The amount of this claim exceeds Seventy-Five Thousand Dollars (\$75,000.00), and venue is proper in Baltimore City as the forum in which the Defendants reside and/or regularly conduct business, and as the forum in which the acts complained about occurred.

FACTS COMMON TO ALL COUNTS

15. On December 9, 2014, Plaintiff Kia Roberts, who was 31 years old, presented to The Johns Hopkins Hospital for a scheduled primary C-section because of a history of a previous myomectomy. The C-Section was performed by Defendant Tamara Deshawn Terry, M.D. This was a first pregnancy for Ms. Roberts. All of Ms. Roberts’ prenatal care had been delivered at Johns Hopkins Community Physicians.

16. Although Dr. Terry reported adhesions, she also reported a routine C-section. Other than an extension of the hysterotomy incision with some bleeding, no adverse events were reported. Dr. Terry did not report any concern about a bowel injury. Nor did Dr. Terry report that she ran the bowel before closing.

17. Despite Dr. Terry’s operative note, the perioperative records show that Ms. Roberts experienced an episode of severe hypotension (50s/30s), requiring pressors to maintain a normal blood pressure. She had blood loss of 1700 ccs, which was greater than expected. She received 4.5 L of fluid in the operating room. While her initial urine output was good in the PACU, it decreased over the next several hours. A bedside ultrasound showed possible free fluid in hepatic and splenic gutters. A CT scan of the abdomen showed marked contrast

retention within the renal parenchyma bilaterally consistent with an acute kidney injury. She had mild to moderate thickening of the ascending and transverse colon which, according to the reporting radiologist “could be reactive to postsurgical inflammation and accentuated by decompression.” She had small bilateral pleural effusions and bibasilar consolidation probably due to compressive atelectasis. Her oliguria was thought to be likely due to ischemic acute tubular necrosis.

18. By the first postop day, Ms. Roberts had hyperkalemia. In the evening of post op day 1, Ms. Roberts was running a fever. By postop day 4, she had still not passed flatus or had a bowel movement. An abdominal x-ray showed gas in the bowel that appeared increased from the previous CT scan. Although the records state that on the day of discharge, Ms. Roberts passed gas and had a bowel movement, Ms. Roberts does not recall passing gas or having a bowel movement. Ms. Roberts was still in severe pain, and both she and her mother were concerned about a bowel obstruction. Despite these concerns, Ms. Roberts was discharged on post-op day 5 – December 14, 2014.

19. Ms. Roberts returned to Johns Hopkins Hospital on December 16, 2014 in acute distress. She had severe abdominal pain and her belly was distended. She reported that she had not passed flatus and had not had a bowel movement since discharge. She was tachycardic. Labs demonstrated an elevated WBC to 17.39 with elevated bands, low RBC at 3.19, elevated platelet count, and elevated LDH. A CT scan of the abdomen showed a large multiloculated ascites with extensive peritoneal thickening and hyper-enhancement and multiple discrete rim enhanced loculated fluid collections throughout the abdomen and pelvis concerning for multiple abscesses and associated peritonitis. The CT scan also showed significant increase in intraperitoneal free air concerning for either a viscous perforation or gas forming

superinfection. Ms. Roberts was taken emergently to the operating room for an exploratory laparotomy by the gyn/onc team at Hopkins.

20. Upon entry into the peritoneal cavity, approximately 2 liters of extremely foul smelling ascites was found with extensive fibrinous exudate and inflammatory changes throughout the abdomen and pelvis, most notably in the mid-abdomen on the small bowel. The transverse colon was markedly dilated with evidence of gross enteric contamination with apparent small bowel contents staining the surgical field. The bowel was run in its entirety and in the mid-ileum, there was a 2 mm through and through hole. This area of the bowel was resected. The rest of the bowel and colon were found to be injury free, although the cecum and terminal ileum were densely adherent to the right paracolic gutter. The abdomen and pelvis were irrigated multiple times until all four quadrants were clear. An anastomosis was performed on the bowel. Two intraperitoneal drains were placed. The fascia was closed, a wound vac was placed, and Ms. Roberts was taken to the PACU.

21. Postoperatively, Ms. Roberts was started on IV Zosyn for 7 days and then transitioned to Augmentin. She remained septic for a time with her WBC reaching 43. She was treated with extensive fluid resuscitation. She was also oliguric with a creatinine reaching 1.4. She developed significant edema, for which she received IV Lasix. She had episodes of diarrhea as her diet was advanced. She continued to be tachycardic for a time. She had atelectasis and moderate bilateral pleural effusions. Her vital signs ultimately normalized with continued fluid resuscitation and IV antibiotics. On post-op day 7, Ms. Roberts was taken back to the operating room for removal of her wound vac and closure of her skin. At the time of discharge on December 23, 2014, she had two Jackson Pratt drains still in place – one subcutaneous and one that was intra-peritoneal, and she was still grossly swollen in both legs.

22. Following discharge, Ms. Roberts had more episodes of diarrhea, and her antibiotics were switched from Augmentin to Amoxicillin. She continued on pain medication. She continued to have significant leg swelling. She had drainage from her incision. She was tired. She missed bonding with her baby after delivery.

23. Over time, Ms. Roberts developed increased abdominal pain and had to undergo a percutaneous drain placement on February 9, 2015 because of a left lower abdominal fluid collection. The drain caused continued extreme pain, with pain being 7-8/10. The drain was finally removed on February 20, 2015.

24. Since healing from the abdominal surgeries, perforation of the bowel and drain placements, Ms. Roberts continues to have loose and runny stools. She remains very emotional, and every comparison to other moms' experiences with their newborn babies brings additional upset and anxiety. Every time she feels a twinge or pain, she worries that something is wrong. She is terrified to have any more children, and the sepsis caused scar tissue in her abdomen will likely make having any more children very difficult if not impossible. She continues to have an ugly vertical scar on her belly that reminds her on a daily basis of the fact she almost died just after having her son, and of the time she missed with him as an infant.

**COUNT I
(Negligence)**

The Plaintiff, Kia Roberts, adopts and incorporates by reference paragraphs 1 through 25 of this Complaint as though fully set forth herein.

25. At all times complained of herein, the Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc. and The Johns Hopkins Health System Corporation, owned and operated medical facilities licensed in the State of Maryland, and delivered health care to citizens of the State of

Maryland, and individually and through their agents, servants, and/or employees, represented to the public and to the Plaintiff Kia Roberts possession of that degree of skill, knowledge and ability ordinarily possessed by a tertiary care hospital offering outpatient and inpatient medical, surgical, obstetrical, rehabilitative, respiratory and nursing services.

26. At all times complained of herein, Defendant, Johns Hopkins University d/b/a Johns Hopkins Medicine, individually and through its agents, servants, and/or employees, including its physicians, advanced practice nurses, nurses, therapists and other health care professionals, represented to the public and to the Plaintiff possession of that degree of skill, knowledge and ability ordinarily possessed by reasonably competent ob/gyn surgeons, residents, medical students, physician assistants, advanced practice nurses, nurses, therapists and other health care professionals.

27. At all times complained of herein, Defendant, Tamara Deshawn Terry, M.D., was licensed to practice medicine in the State of Maryland, and represented to the public and to the Plaintiff Kia Roberts possession of that degree of skill, knowledge and ability ordinarily possessed by a reasonably competent physician practicing in obstetrics and gynecology.

28. At all times complained of herein, Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, owed to the Plaintiff Kia Roberts the duty to exercise that degree of care, skill and judgment ordinarily expected of reasonably competent physicians, residents, nurse anesthetists, physician assistants, nurse practitioners, nurses, nurses

aids, physical therapists, occupational therapists and other health care professionals in the same or similar circumstances. That duty included the proper interpretation and performance of adequate and appropriate diagnostic tests and procedures to determine the nature and severity of any medical conditions suffered by the Plaintiff Kia Roberts; the prompt employment of appropriate procedures and treatments to correct such conditions; continuous evaluation of the course of such treatments in response to such evaluations; appropriate notification to the Plaintiff of the various alternatives and risks involved in the various modalities of treatment; attendance and proper performance at all surgeries and procedures; and complete disclosure of adverse medical events and findings.

29. At all times complained of herein, Defendants, The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, breached and violated the accepted standards of care and were negligent in their care and treatment of Plaintiff Kia Roberts. These breaches of the standards of care include, but are not limited to, the following:

- a. Failing to exercise reasonable care in the timely and careful diagnosis and treatment of Plaintiff's conditions;
- b. Failing to employ adequate diagnostic procedures and tests to determine the nature and severity of the medical status and/or conditions of the Plaintiff;
- c. Failing to exercise reasonable care in the timely and careful diagnosis of such conditions;
- d. Failing to act within the standard of care in their care and treatment of Plaintiff Kia Roberts;

- e. Failing to exercise timely and reasonable care in employing appropriate treatments to correct or address such conditions;
- f. Failing to exercise timely and reasonable care in evaluating the effects of any treatments to correct or address such conditions;
- g. Failing to exercise timely and reasonable care in adjusting the chosen course of treatment or care provided to the Plaintiff;
- h. Failing to recognize and repair the perforation to the bowel that occurred during the C-section before closing;
- i. Failing to identify, recognize and repair the injury to the bowel in the immediate post-op period and well before discharge from Johns Hopkins Hospital on December 14, 2014;
- j. Discharging Plaintiff Roberts from The Johns Hopkins Hospital when she had a perforated bowel;
- k. Failing to timely address and correct changes in the patient's condition;
- l. Failing to provide informed consent to Kia Roberts; and
- m. Being otherwise careless and negligent.

30. The Plaintiff further avers that as a direct and proximate result of the negligent and careless acts and omissions of the Defendants+ The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, Plaintiff Kia Roberts experienced permanent and disabling injuries, sepsis, a severe shock to her nerves and nervous system, conscious pain and suffering, the need for emergency exploratory surgery, resection and anastomosis of the bowel, the need for additional medical and invasive treatments,

continued pain, anxiety, damage to her ability to carry other pregnancies to term, and has been otherwise hurt, injured and damaged.

31. The Plaintiff further avers that as a direct and proximate result of the inappropriate and substandard surgical, medical and nursing care, treatment and management by the Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, nurse anesthetists, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, Plaintiff Kia Roberts was permanently injured and damaged.

32. The Plaintiff further avers that the injuries, damages and losses sustained by Plaintiff Kia Roberts were due to the negligent and careless acts and omissions of the Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, nurse anesthetists, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, who breached the aforementioned duties of care to the Plaintiff.

33. The Plaintiff further avers that all of these injuries and damages were caused by the negligent acts and omissions of the Defendant The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The

Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, nurse anesthetists, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, without any negligence or want of due care on the part of the Plaintiff thereunto contributing.

WHEREFORE, Plaintiff Kia Roberts brings this claim against the Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., in an amount in excess of the minimum jurisdiction of the Circuit Court for Baltimore City, together with interest, fees, costs, and such other and further relief as justice requires.

COUNT II (Informed Consent)

The Plaintiff, Kia Roberts, repeats, realleges, adopts and incorporates by reference paragraphs 1 through 33 of this Complaint as though fully set forth herein.

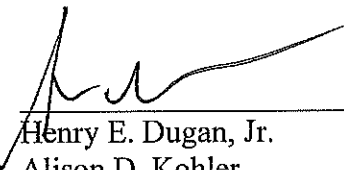
34. The Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, nurse anesthetists, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, owed to the Plaintiff the duty of appropriate notification of the various alternatives and risks involved in various modalities of treatment.

35. The Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, nurse anesthetists, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, were negligent in failing adequately and appropriately to explain the proposed procedures or treatment, to warn of material risks or dangers inherent in or collateral to the proposed procedures or treatment, to discuss with the patient the viable medical alternatives to the proposed procedures or treatment, to allow the patient to make an intelligent and informed choice about whether or not to undergo the proposed procedures or treatment, to inform the patient promptly of material changes in the medical circumstances, and to obtain an informed consent from the Plaintiff Kia Roberts and were otherwise negligent.

36. The Plaintiff Kia Roberts further alleges that as a direct and proximate result of the negligence of the Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, nurse anesthetists, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, in failing to obtain Plaintiff's informed consent, the Plaintiff experienced a severe shock to her nerves and nervous system, pain, mental anguish, unnecessary procedures, unnecessary hospital and medical care and expenses, was otherwise injured and damaged.

37. The Plaintiff further alleges that all of these injuries and damages were caused by the negligent acts and omissions of the Defendants+ The Johns Hopkins Hospital, Johns Hopkins University. d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., individually and/or by and through their agents, servants, and/or employees, including physicians, residents, nurse anesthetists, physician assistants, nurse practitioners, nurses, nurses aids, physical therapists, occupational therapists and other health care professionals, in failing to obtain Plaintiff's informed consent, without any negligence or want of due care on the part of the Plaintiff thereunto contributing.

WHEREFORE, the Plaintiff, Kia Roberts, brings this claim against the Defendants The Johns Hopkins Hospital, Johns Hopkins University d/b/a Johns Hopkins Medicine, Johns Hopkins Community Physicians, Inc., The Johns Hopkins Health System Corporation, and Tamara Deshawn Terry, M.D., in an amount in excess of the minimum jurisdiction of the Circuit Court for Baltimore City, together with interest, fees, costs, and such other and further relief as justice requires.

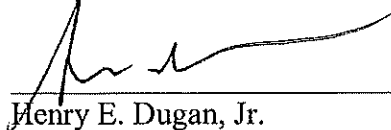


Henry E. Dugan, Jr.
Alison D. Kohler
Dugan, Babij, Tolley & Kohler, LLC
1966 Greenspring Drive, Suite 500
Timonium, Maryland 21093
(410) 308-1600

Attorneys for Plaintiff

ELECTION FOR JURY TRIAL

The Plaintiff, Kia Roberts, by and through her undersigned attorneys, elects to try this case before a jury.



Henry E. Dugan, Jr.
Alison D. Kohler
Dugan, Babij, Tolley & Kohler, LLC
1966 Greenspring Drive, Suite 500
Timonium, Maryland 21093
(410) 308-1600

Attorneys for Plaintiff

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