

RA'SHAUN RAY,
Mother and Next Friend of
GABRIELLE SHAW, Infant
3523 Cabot Road
Randallstown, Maryland 21133

and

RA'SHAUN RAY
3523 Cabot Road
Randallstown, Maryland 21133

Plaintiff

v.

ERIKA L. NICHELSON, D.O.
6610 Tributary Street, Suite 206
Baltimore, Maryland 21224

and

TERESA HOFFMAN, M.D.
AND ASSOCIATES, LLC
301 Saint Paul Street
Baltimore, Maryland 21202
Serve on Resident Agent:
Linda H. Jones, Esquire
218 N. Charles Street, Suite 400
Baltimore, Maryland 21201

and

ST. PAUL PLACE SPECIALISTS, INC.
301 Saint Paul Place
Baltimore, Maryland 21202
Serve on Resident Agent:
Linda H. Jones, Esquire
218 N. Charles Street, Suite 400
Baltimore, Maryland 21201

and

MERCY MEDICAL CENTER, INC.
301 Saint Paul Place
Baltimore, Maryland 21202

IN THE
CIRCUIT COURT
FOR
BALTIMORE CITY

Case No.:

2015 OCT 21 10:12 AM
CIVIL
Case: 240-15-005326
CV File #
RIF-New Case \$30.00
Appear Fee \$30.00
MLSC \$40.00
TOTAL \$55.00
\$205.00
Receipt #201500025240
Cashier: REJ CCBCX82
10/21/15 9:59am

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

Defendants :

: : : : : : : : : :

COMPLAINT

COUNT I

COMES NOW the Plaintiff, Ra'Shaun Ray, Mother and Next Friend of Gabrielle Shaw, Infant, by her attorneys, Jonathan Schochor, Kerry D. Staton, and Schochor, Federico and Staton, P.A. and sues, Erika L. Nicholson, D.O., Teresa Hoffman, M.D. and Associates, LLC, St. Paul Place Specialists, Inc., and Mercy Medical Center, Inc., Defendants:

1. At all times of which the Plaintiff complains, the Defendant Erika L. Nicholson, D.O. (hereinafter referred to as "Nicholson") represented to the Plaintiff, the Infant Plaintiff, and the public that she possessed the degree of skill, knowledge and ability possessed by reasonably competent medical practitioners, practicing under the same or similar circumstances as those involving the Plaintiff and Infant Plaintiff.

2. The Plaintiff alleges that the Defendant Nicholson herein, including duly authorized agents and/or employees of the Defendant corporation, LLC, and Hospital, owed to the Plaintiff the duty to exercise the degree of care, skill and judgment expected of a competent medical practitioner acting in the same or similar circumstances, which duty included the performance of adequate and proper diagnostic tests and procedures to determine the nature and severity of the Plaintiff's and Infant Plaintiff's condition, careful diagnosis of such condition, employment of appropriate procedures, surgery and/or treatment to correct such conditions without injury upon the Infant Plaintiff, continuous evaluation of the Plaintiff's and Infant

Plaintiff's condition and the effects of such treatment, and adjustment of the course of treatment in response to such ongoing surveillance and evaluation -- all of which these Defendant failed to do.

3. The Defendant Nichelson was negligent in that she failed to employ appropriate treatment, surgery, tests and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff's and Infant Plaintiff's condition, failed to properly and appropriately diagnose the Plaintiff's and Infant Plaintiff's condition, failed to thoroughly evaluate the effects and results of any tests and/or procedures performed, failed to properly evaluate the effects of chosen treatment, failed to adjust the Plaintiff's and Infant Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff's and Infant Plaintiff's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Plaintiff's and Infant Plaintiff's condition, and was otherwise negligent.

4. The Plaintiff alleges that the Defendants Teresa Hoffman, M.D. and Associates, LLC, and St. Paul Place Specialists, Inc., through their agents, servants and employees, owed to the Plaintiff and Infant Plaintiff a duty to exercise a degree of care, skill and judgment expected of a competent medical corporation acting in the same or similar circumstances, which duty included the performance of adequate and proper diagnostic tests and procedures to determine the nature and severity of the Plaintiff's and Infant Plaintiff's condition, careful diagnosis of such condition, employment of appropriate procedures, tests, surgery and/or treatment to correct such conditions without inflicting injury upon the Plaintiff and Infant Plaintiff, continuous evaluation of the Plaintiff's and Infant Plaintiff's condition and effects of such treatment, and the

adjustment of the course of treatment in response to ongoing surveillance and evaluation -- all of which the Defendants failed to do.

5. The Defendants Teresa Hoffman, M.D. and Associates, LLC, and St. Paul Place Specialists, Inc., through their agents, servants and/or employees, were negligent in that they failed to employ appropriate treatment, surgery and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff's and Infant Plaintiff's condition, failed to thoroughly evaluate the effects and results of any tests, treatment and/or procedures performed, failed to adjust the Plaintiff's and Infant Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff's and Infant Plaintiff's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Plaintiff's and Infant Plaintiff's condition, failed to diagnose the Plaintiff's and Infant Plaintiff's condition and were otherwise negligent.

6. The Plaintiff alleges that the Defendant Mercy Medical Center, Inc. (hereinafter referred to as "Hospital"), through its agents, servants and employees, owed to the Plaintiff and Infant Plaintiff a duty to exercise a degree of care, skill and judgment expected of a competent medical corporation acting in the same or similar circumstances, which duty included the performance of adequate and proper diagnostic tests and procedures to determine the nature and severity of the Plaintiff's and Infant Plaintiff's condition, careful diagnosis of such condition, employment of appropriate procedures, tests, surgery and/or treatment to correct such conditions without inflicting injury upon the Plaintiff and Infant Plaintiff, continuous evaluation of the Plaintiff's and Infant Plaintiff's condition and effects of such treatment, and the adjustment of the course of treatment in response to ongoing surveillance and evaluation -- all of which the Defendant failed to do.

7. The Defendant Hospital, through its agents, servants and/or employees, was negligent in that it failed to employ appropriate treatment, surgery and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff's and Infant Plaintiff's condition, failed to thoroughly evaluate the effects and results of any tests, treatment and/or procedures performed, failed to adjust the Plaintiff's and Infant Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff's and Infant Plaintiff's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Plaintiff's and Infant Plaintiff's condition, failed to diagnose the Plaintiff's and Infant Plaintiff's condition and was otherwise negligent.

8. At all times referred to herein, the Defendant Nichelson acted for herself and as a duly authorized agent and/or employee of the Defendant Teresa Hoffman, M.D. and Associates, LLC, and/or the Defendant St. Paul Place Specialists, Inc. and/or the Defendant Hospital, acting within the scope of her authority. Additionally, any and all other personnel caring for the Plaintiff and Infant Plaintiff acted as duly authorized agents and/or employees of these Defendants, acting within the scope of their respective authority.

9. As the direct and proximate result of the ongoing negligence of these Defendants and each of them, the Infant Plaintiff suffered unending physical pain, emotional anguish, fear, anxiety and permanent disability as is more fully described, hereinbelow.

10. On August 30, 2011, the Plaintiff, Ra'Shawn Ray, was admitted to the Defendant Hospital in labor. At all times referred to herein, she was under the care of the Defendant Nichelson who held herself out to be an expert in obstetrics and gynecology.

11. After progressing to full dilatation at approximately 7:12 a.m., the Plaintiff began pushing and at 7:43 a.m., a shoulder dystocia was encountered. Thereafter, the Infant Plaintiff was birthed at 7:45 a.m. Shortly after birth, it became obvious that the Infant Plaintiff had suffered an Erb's Palsy due to injury of the brachial plexus during the course of the delivery.

12. It is alleged that the standards of care required the delivering obstetrician, the Defendant Nicholson and/or any other hospital personnel caring for the Plaintiffs, to utilize appropriate maneuvers and avoid the utilization of excess traction and force to accomplish the delivery. It is asserted that the Defendants herein failed to utilize appropriate techniques in a proper fashion and utilized excessive force and traction during the course of the delivery -- resulting in severe injury to the brachial plexus as a result.

13. It is asserted that the Infant Plaintiff was unable to use her left arm, and was subsequently seen at a specialty hospital by a pediatric neurologist on September 9, 2011. The neurologist noted severe weakness in the left arm and diagnosed the Infant Plaintiff with an extensive brachial plexus palsy. He then recommended electromyogram (EMG) studies in addition to home exercises. An initial EMG performed later that day was limited, but demonstrated left upper and mid-brachial plexus damage and injury.

14. On October 7, 2011, the Infant Plaintiff returned for follow-up the pediatric neurologist. EMG studies were performed again which confirmed de-ervation and showed no voluntary motor units in the interests of the nanus, deltoid, biceps, triceps or extensor digitorum communis (EDC), the left first dorsal interosseous (FDI) had both abnormal spontaneous activity and reduced recruitment of voluntary motor unit activity.

15. Accordingly, surgery was recommended, and on April 6, 2012, the Infant Plaintiff was admitted to another specialty hospital under the care of a pediatric orthopedic surgeon to

surgically address her brachial plexus palsy (Erb's Palsy). When the Infant Plaintiff was taken to an operating room, the surgeon found an extensive neuroma involving the entire upper trunk and middle trunk as well as the branches off the upper trunk involving the brachial plexus nerve in addition to branches off the upper trunk involving the suprascapular nerve. The neuroma was resected and two cable grafts were placed.

16. It is asserted that the operative procedure proved, objectively, that there was an extremely serious and extensive injury to the brachial plexus nerve during the course of the Infant Plaintiff's delivery. It is alleged that the brachial plexus is the largest nerve in the body. It is further alleged that the type and severity of the injury was occasioned through the use of significantly excessive force and traction during the course of the delivery -- in continuing violation of the standards of care.


17. It is alleged that the Infant Plaintiff has in the past, is presently, and will in the future continue to suffer excruciating physical pain, emotional anguish, fear, anxiety, humiliation and embarrassment over her condition. Additionally, it is alleged that the Infant Plaintiff has in the past, is presently, and will in the future continue to incur ongoing surgical, medical, physiotherapeutic, pharmacological, nursing, custodial and other losses and expenses for which claim is made.

18. It is alleged that the severe and permanent injuries inflicted upon the Infant Plaintiff will prevent her from engaging in normal activities that other infants, toddlers, children and adults enjoy. She will be forced to progress through her life as a one-armed person in a two-armed world. She will be unable to engage in activities enjoyed by others, and will be severely limited in her ability to hold gainful employment.

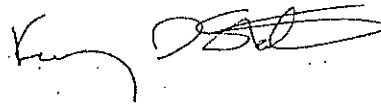
19. Had these Defendants and each of them conformed with the applicable standards of care, and avoided the excess traction and force utilized during the course of delivery, it is alleged that the Infant Plaintiff would have been born in a normal fashion -- with the Erb's Palsy and all the attendant disability avoided.

20. The Plaintiff and Infant Plaintiff refer to the negligence of these Defendants and each of them as the sole and proximate cause all of the injuries, damages and permanent disability from which the Infant Plaintiff suffers -- with the Plaintiff and Infant Plaintiff being in no way contributorily negligent.

21. The negligence complained of occurred in Baltimore City. Venue is claimed in Baltimore City. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).



Jonathan Schochor



Kerry D. Staton

Schochor, Federico & Staton, P.A.

Schochor, Federico and Staton, P.A.

The Paulton
1211 St. Paul Street
Baltimore, Maryland 21202
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jschochor@sfspa.com
kstaton@sfspa.com

Attorneys for the Plaintiff

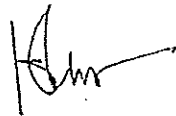
COUNT II

COMES NOW the Plaintiff, Ra'Shaun Ray, by her attorneys, Jonathan Schochor, Kerry D. Staton, and Schochor, Federico and Staton, P.A. and sues, Erika L. Nichelson, D.O., Teresa Hoffman, M.D. and Associates, LLC, St. Paul Place Specialists, Inc., and Mercy Medical Center, Inc., Defendants:

1. The Plaintiff incorporates in this Count those facts set forth in Count I hereinabove by reference thereto intending that each and every allegation hereinabove be deemed part hereof as if the same were repeated herein.

2. It is alleged that the Plaintiff has in the past, is presently and will in the future continue to incur hospital, surgical, medical, pharmacological, physiotherapeutic, nursing, custodial, and other losses and expenses for which claim is made.

3. The negligence complained of occurred in Baltimore City. Venue is claimed in Baltimore City. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).



Jonathan Schochor



Kerry D. Staton

Schochor, Federico & Staton, PA

Schochor, Federico and Staton, P.A.
1211 St. Paul Street
Baltimore, Maryland 21202
(410) 234-1000
jschochor@sfspa.com
kstaton@sfspa.com
Attorneys for the Plaintiff

RA'SHAUN RAY,
Mother and Next Friend of
GABRIELLE SHAW, Infant, et al

Plaintiff

v.

ERIKA L. NICHELSON, D.O., et al

Defendants

IN THE
CIRCUIT COURT
FOR
BALTIMORE CITY

Case No.:

ELECTION FOR JURY TRIAL

The Plaintiff in this case elects to try her case before a Jury.



Jonathan Schochor



Kerry D. Staton

Schochor, Federico & Staton, PA

Schochor, Federico and Staton, P.A.

The Paulton
1211 St. Paul Street
Baltimore, Maryland 21202
(410) 234-1000

jschochor@sfspa.com

kstaton@sfspa.com

Attorneys for the Plaintiff

RA'SHAUN RAY,
Mother and Next Friend of
GABRIELLE SHAW, Infant, et al

Plaintiff

v.

ERIKA L. NICHELSON, D.O., et al

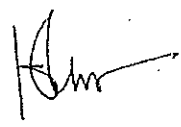
Defendants

IN THE
CIRCUIT COURT
FOR
BALTIMORE CITY
Case No.:

: : : : : : : : : : : :

CERTIFICATE OF DISCOVERY

I HEREBY CERTIFY that Interrogatories, Request for Production of Documents, and Notice to Take Deposition will be served along with the Complaint, and that I will retain the original of this document in my possession, without alteration, until the case is concluded in this Court, the time for noting an appeal has expired, and any appeal noted has been decided.



Jonathan Schochor
Schochor, Federico and Staton, P.A.
1211 St. Paul Street
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(410) 234-1000
jschochor@sfspa.com

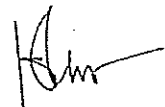
Attorneys for the Plaintiff

RA'SHAUN RAY,	:	BEFORE THE
Mother and Next Friend of	:	HEALTH CARE
GABRIELLE SHAW, Infant, et al	:	ALTERNATIVE DISPUTE
Claimant	:	RESOLUTION OFFICE
v.	:	HCA No.:
ERIKA L. NICHELSON, D.O., et al	:	
Defendants	:	
:	:	
:	:	
:	:	

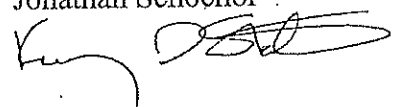
ELECTION FOR WAIVER OF ARBITRATION

COMES NOW the Claimant, Ra'Shaun Ray, Individually and as Mother and Next Friend of Gabrielle Shaw, Infant, by her attorneys, Jonathan Schochor, Kerry D. Staton and Schochor, Federico and Staton, P.A., and files this Election for Waiver of Arbitration pursuant to the Annotated Code of Maryland, Courts and Judicial Proceedings Article, Section 3-2A-06B. For reasons in support thereof, the Claimant respectfully represents:

1. The Claimant has elected to waive arbitration in the above-captioned case to save time and expense associated herewith.
2. That after filing, this election shall be binding on all parties.



 Jonathan Schochor



 Kerry D. Staton
 Schochor, Federico and Staton, P.A.
 1211 St. Paul Street
 Baltimore, Maryland 21202
 (410) 234-1000
 Attorneys for the Claimants

RA'SHAUN RAY, ET AL.	:	BEFORE THE
Claimants	:	HEALTH CARE
v.	:	ALTERNATIVE DISPUTE
ERIKA L. NICHELSON, D.O.,	:	RESOLUTION OFFICE
ET AL.	:	OF MARYLAND
Defendants	:	Case No.

: : : : : : : : : : : :

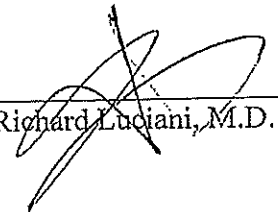
CLAIMANTS' CERTIFICATE OF MERIT

I HEREBY CERTIFY and acknowledge that I have reviewed the hospital records, medical records, and other documentation pertaining to the facts and circumstances in the above-captioned case.

I hereby certify and acknowledge that there have been violations of the standards of care by Erika L. Nicholson, D.O., Teresa Hoffman, M.D. and Associates, LLC, St. Paul Place Specialists, Inc. and Mercy Medical Center, Inc. which have directly and proximately resulted in injuries and damages to the Minor Claimant.

I certify that I am a board-certified expert in obstetrics and gynecology. I further certify that I have had clinical experience, provided consultation relating to clinical practice and/or taught medicine in the Defendant's specialty or a related field of health-care, or in the field of health care in which the Defendant provided care or treatment to the Claimant, within five (5) years of the date of the alleged act or omission giving rise to the cause of action.

I acknowledge that less than 20% of my annual professional time directly involves testimony in personal injury claims. My report in the above-referenced case is attached hereto.



 Richard Luciani, M.D.

Jonathan Schochor, Esquire
Schochor, Federico and Staton, P.A.
The Paulton
1211 St. Paul Street
Baltimore, Maryland 21202

Re: Gabrielle Shaw, Minor

Dear Mr. Schochor:

This is to acknowledge that after a review of the medical records and other material involved in the above-referenced case, I have concluded that there have been violations of the standards of care by Erika L. Nicholson, D.O., Teresa Hoffman and Associates, LLC, St. Paul Place Specialists, Inc. and Mercy Medical Center, Inc. which have directly and proximately resulted in injuries and damages to the Minor Claimant.

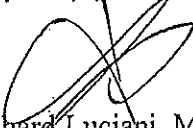
It is my opinion that the Defendant Nicholson, acting for herself and as a duly authorized agent and/or employee of the Defendants Teresa Hoffman and Associates, LLC, St. Paul Place Specialists, Inc. and/or Mercy Medical Center, Inc. breached the standards of care by utilizing excessive traction during the delivery of Gabrielle resulting in a permanent left brachial plexus injury. It is my opinion that had all of these Defendants complied with the applicable standards of care that all of the injuries and damages, including the brachial plexus injury, sustained by Gabrielle Shaw would have been avoided. Additionally, I incorporate the Complaint filed in this case by reference.

I certify that I am a board-certified expert in obstetrics and gynecology. I further certify that I have had clinical experience, provided consultation relating to clinical practice and/or taught medicine in the Defendants' specialty or a related field of health-care, or in the field of health care in which the Defendants provided care or treatment to the Claimant, within five (5) years of the date of the alleged act or omission giving rise to the cause of action.

Accordingly, I have concluded that the case filed before the Health Care Alternative Dispute Resolution Office of Maryland is meritorious. I also acknowledge that less than twenty percent of my annual professional time involves testimony in personal injury claims.

This report represents a broad summary of my opinions for purposes of certifying the merit of this matter. I specifically reserve the right to modify, amend and/or supplement my opinions as further information about this case is made available to me through the discovery process.

Very truly yours,



Richard Luciani, M.D.

2015 OCT 20 AM 11:12

Circuit Court for Baltimore City



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: Shaw, et al vs. Nichelson, et al

JURY DEMAND: [X] Yes [] No Anticipated length of trial: 10 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)

Table with columns: 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 [] No B. Arbitration [] Yes [] No
C. Settlement Conference [] Yes [] No D. Neutral Evaluation [] Yes [] 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.
[] 1/2 day of trial or less [] 3 days of trial time
[] 1 day of trial time [X] More than 3 days of trial time
[] 2 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 10/16/15 Signature [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. |