

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

CLERK OF COURT
BALTIMORE CITY

BEVERLY FREEMAN
4703 West Forest Park Avenue
Gwynn Oak, MD 21207

2020 SEP -4 PM 1:58

Plaintiff

CIVIL DIVISION

v.

Civil No.:

24.C.20.003809

JOHN GOELZ, CRNA
Johns Hopkins Hospital
1800 Orleans St.
Baltimore, MD 21287

Case# 24-C-20-003809
CV Filing Fee \$30.00
RF-New Case \$30.00
FILE \$25.00
TOTAL \$125.00

AMANDA FADER, M.D.
Johns Hopkins Hospital
1800 Orleans St.
Baltimore, MD 21287

THE JOHNS HOPKINS UNIVERSITY
3400 N. Charles St.
Baltimore, MD 21218-2683

COMMENT:
BALANCE DUE \$25.00 asse

Serve:
Resident Agent, Arthur P. Pineau
Interim General Counsel
113 Garland Hall
3400 N. Charles St.
Baltimore, MD 21218

Receipt # 4000000013003
Cashier # LGC 00007015
09/03/20 2:10 PM

THE JOHNS HOPKINS HOSPITAL
600 North Wolfe Street
Baltimore, MD 21287

Serve:
Resident Agent, G. Daniel Shealer, Jr.
The Johns Hopkins Hospital
733 North Broadway, Suite 102
Baltimore, MD 21205

Defendants

COMPLAINT

COMES NOW, the Plaintiff, BEVERLY FREEMAN, by and through counsel,

AXELSON, WILLIAMOWSKY, BENDER, & FISHMAN, P.C., and files suit against the Defendants JOHN GOELZ, AMANDA FADER, JOHNS HOPKINS UNIVERSITY, and JOHNS HOPKINS HOSPITAL, and in support there of states as follows:

1. The Plaintiff Beverly Freeman is over the age of 18 and is a resident of Baltimore City, Maryland.
2. The Defendant John Goelz, CRNA is a certified nurse anesthetist, who performs substantial business in Baltimore City, Maryland.
3. The Defendant Amanda Fader, M.D. is a medical doctor, who performs substantial business in Baltimore City, Maryland.
4. The Defendant Johns Hopkins University and Johns Hopkins Hospital is a university and hospital providing medical services in Baltimore City, Maryland, and all actions taken by John Goelz, CRNA and Amanda Fader, M.D. were within the course and scope of their employment as an employee of Johns Hopkins Univ and Johns Hopkins Hospital.
5. This court has jurisdiction in this matter in accordance with Maryland Courts and Judicial Proceedings Code Annotated §1-501 and 6-103.
6. Venue is proper pursuant to Maryland Courts and Judicial Proceedings Code Annotated §6-201 as the Defendants perform substantial business in Baltimore City, Maryland.

COUNT 1
(Professional Liability/Medical Malpractice)

7. The allegations in paragraphs 1 through 6 of this Statement of Claim are incorporated herein by reference and are repeated in full.

8. Plaintiff sought treatment with Amanda Fader, M.D. to perform a hysterectomy surgery on July 25, 2018.
9. Prior to the surgery, John Goelz, CRNA, placed an IV line in Ms. Freeman's right arm to administer various medications, including the drugs Propofol, phenylephrine, and methylene blue, in the Operating Room.
10. While Ms. Freeman was still conscious, after the IV line was placed, Ms. Freeman screamed out in pain and told Mr. Goelz and the various physicians in the Operating Room, including Defendant Fader, that she suffered an electric shock sensation and asked the members of the Operating Room team, including Mr. Goelz, to stop the IV and to remove and check the IV line because there was a problem with the IV line. Despite said request, Mr. Goelz did not remove the IV line, Ms. Freeman was placed under anesthesia, and Defendant Fader proceeded with the surgical procedure. While Ms. Freeman was in the Operating Room, methylene blue was injected into Ms. Freeman's body and this caused extravasation of the methylene blue from her vein. The extravasation would not have occurred if the IV had been removed and checked and the surgery stopped.
11. After the surgical procedure was completed, Ms. Freeman awoke in the Recovery Room with severe pain in her right arm and her arm was black and blue and swollen as a result of the methylene blue infusion.
12. Thereafter, Ms. Freeman was hospitalized in the Intensive Care Unit for a period of time and has continued to suffer pain and problems in her right arm, causing a permanent injury in her right arm.

13. The failure to remove the IV line in a timely manner and check caused Ms. Freeman to suffer permanent injury by injuring and damaging nerves in the right arm and to cause her to suffer a diagnosis of chronic regional pain syndrome.
14. After discharge from the hospital, Ms. Freeman has undergone significant treatment and will continue to need further medical treatment in the future.
15. Prior to retaining the services of the Defendants, the Defendants represented to the Plaintiff that they were competent to undertake, care for, treat, and diagnose all conditions related to Plaintiff's medical conditions and therefore assumed the duties owed to patients by any reasonably competent medical practitioners in the State of Maryland to diagnose and treat Plaintiff's conditions in the same or similar circumstances.
16. Said duties included the careful assessment of the signs, symptoms, and severity of Plaintiff's medical condition and the efficacy of various treatments, including the proper administration of an IV line.
17. Once an appropriate diagnosis had been formed, said duties also included the appropriate notification to the Plaintiff of various alternatives and risks involved, various modalities of treatment and the proper implementation of necessary medical procedures as well as appropriate monitoring, followup care, and referral to any necessary specialist.
18. Moreover, the Defendants owed a duty to the Plaintiff to provide reasonable and proper medical care and treatment to Plaintiff, including appropriate administration of all IV lines and supervision of all IV lines being provided to

the Plaintiff.

19. The Defendants acted negligently and breached said applicable duties and standard of care owed to the Plaintiff as well as the applicable standard of medical care in the State of Maryland, including but not limited to the following:

- A) By failing to place the IV line in a proper manner in Ms. Freeman's right arm in the Operating Room;
- B) By failing to remove the IV line and check the IV line when Ms. Freeman screamed out in pain and told Defendant Goelz and other personnel in the Operating Room, including Defendant Fader, that she suffered an electric shock sensation and asked them to remove the IV line;
- C) With respect to Defendant Fader, by failing to supervise Defendant Goelz and ensure that the IV line infusing Ms. Freeman with medication in her right arm was removed before the surgery and the surgery was stopped until the IV line was checked to ensure it functioned properly.

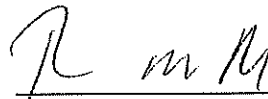
20. As a direct and proximate result of the Defendants' negligence, breaches of duty, and violations of the applicable standards of care, without any negligence on the part of the Plaintiff contributing thereto, the Defendants caused damage to the nerve in Plaintiff's right arm, which has led to a diagnosis of chronic regional pain syndrome/causalgia/permanent nerve damage.

21. As a further direct and proximate result of the Defendants' negligence, breaches of duty, and violations of the applicable standards of care, without any negligence on the part of the Plaintiff contributing thereto, Plaintiff has required substantial medical treatment in the past and will continue to do so in the future and has incurred substantial medical expenses in the past and will continue to incur substantial medical expenses in the future.
22. As a further direct and proximate result of the Defendants' negligence, breaches of duty, and violations of the applicable standards of care, without any negligence on the part of the Plaintiff contributing thereto, Plaintiff has lost significant wages in the past and will continue to lose wages in the future as a direct and proximate result of the Defendants' negligence.
23. As a further direct and proximate result of the Defendants' negligence, breaches of duty, and violations of the applicable standards of care, without any negligence on the part of the Plaintiff contributing thereto, Plaintiff has suffered in the past and will continue to experience in the future, severe pain, mental anguish, embarrassment, humiliation, and the loss of her ability to fully enjoy her life in the past and in the future as a result of the severe permanent injury in her right arm caused by Defendants' negligence.

WHEREFORE, the Plaintiff, Beverly Freeman, demands judgment against the Defendants John Goelz, Amanda Fader, M.D., Johns Hopkins University, and Johns Hopkins Hospital for compensatory damages in an amount exceeding the jurisdictional limit of the District Court of Maryland plus interest, costs, and such other and further relief as are necessary and proper.

Respectfully submitted,

**AXELSON, WILLIAMOWSKY,
BENDER & FISHMAN, P.C.**



Bruce M. Bender, Esq.
1401 Rockville Pike, Suite 650
Rockville, Maryland 20852
(301) 738-7660 Office
(301) 424-0124 Fax
CPF# 8312010034
E-mail: bmb@awbflaw.com

2020 SEP -4 PM 1:59

IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

CIVIL DIVISION

BEVERLY FREEMAN

:

Plaintiff,

:

v.

:

Civil No.:

JOHN GOELZ, CRNA, ET AL.

:

Defendants.

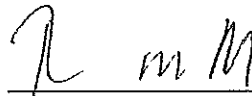
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DEMAND FOR JURY TRIAL

Plaintiff hereby requests a jury trial on all issues in this case.

Respectfully submitted,

**AXELSON, WILLIAMOWSKY,
BENDER & FISHMAN, P.C.**



Bruce M. Bender, Esq.
1401 Rockville Pike, Suite 650
Rockville, Maryland 20852
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E-mail: bmb@awbflaw.com

CIRCUIT COURT
BALTIMORE CITY

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IN THE CIRCUIT COURT FOR BALTIMORE CITY, MARYLAND

CIVIL DIVISION

BEVERLY FREEMAN :

Plaintiff, :

v. :

Civil No.:

JOHN GOELZ, CRNA, ET AL. :

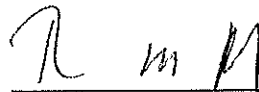
Defendants :

LINE

PLEASE Issue Summons on the above named Defendants and return to the undersigned for service by private process.

Respectfully submitted,

**AXELSON, WILLIAMOWSKY,
BENDER & FISHMAN, P.C.**



Bruce M. Bender, Esq.
1401 Rockville Pike, Suite 650
Rockville, Maryland 20852
(301) 738-7660 Office
(301) 424-0124 Fax
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E-mail: bmb@awbflaw.com

IN THE CIRCUIT COURT FOR BALTIMORE CITY

(City or County)

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CIVIL - NON-DOMESTIC CASE INFORMATION REPORT

DIRECTIONS

CIVIL DIVISION

Plaintiff: This Information Report must be completed and attached to the complaint filed with the Clerk of Court unless your case is exempted from the requirement by the Chief Judge of the Court of Appeals pursuant to Rule 2-111(a).

Defendant: You must file an Information Report as required by Rule 2-323(h).

THIS INFORMATION REPORT CANNOT BE ACCEPTED AS A PLEADING

FORM FILED BY: PLAINTIFF DEFENDANT CASE NUMBER _____ (Clerk to insert)

CASE NAME: Beverly Freeman vs. John Goelz, CRNA, et al.
Plaintiff Defendant

PARTY'S NAME: Beverly Freeman PHONE: _____

PARTY'S ADDRESS: 4703 West Forest Park Avenue, Gwynn Oak, MD 21207

PARTY'S E-MAIL: _____

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Bruce M. Bender PHONE: 301-738-7660

PARTY'S ATTORNEY'S ADDRESS: 1401 Rockville Pike, Suite 650, Rockville, Maryland 20852

PARTY'S ATTORNEY'S E-MAIL: bmb@awbflaw.com

JURY DEMAND? Yes No

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

ANTICIPATED LENGTH OF TRIAL?: _____ hours _____ days

PLEADING TYPE

New Case: Original Administrative Appeal Appeal

Existing Case: Post-Judgment Amendment

If filing in an existing case, skip Case Category/ Subcategory section - go to Relief section.

IF NEW CASE: CASE CATEGORY/SUBCATEGORY (Check one box.)

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