

ANGOLA PEAY and
DONTA PEAY, SR.,
Parents and Next Friends of
DONTRAY PEAY, Minor
831 North Patterson Park Avenue
Baltimore, Maryland 21205

Plaintiffs

v.

TERESA ANN HOFFMAN, M.D.
301 Saint Paul Street
Baltimore, Maryland 21202

and

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

and

MERCY MEDICAL CENTER, INC.
301 Saint Paul Place
Baltimore, Maryland 21202
Serve on Resident Agent:
Linda H. Jones, Esquire
218 North Charles Street, Suite 400
Baltimore, Maryland 21201

Defendants

: : : : : : : : : :

2017 JUL 23 10:30 AM
CIVIL DIVISION

IN THE
CIRCUIT COURT

FOR

BALTIMORE CITY

Case No.: 24-C-17-3456

COMPLAINT

COUNT I

COME NOW the Plaintiffs, Angola Peay and Donta Peay, Sr., Parents and Next Friends of Dontray Peay, Minor, by their attorneys, Jonathan Schochor, Kerry D. Staton, and Schochor, Federico and Staton, P.A. and sue, Teresa Ann Hoffman, M.D., Teresa Hoffman, M.D. and Associates, LLC, and Mercy Medical Center, Inc., Defendants:

1. At all times of which the Plaintiffs complain, the Defendant, Teresa Ann Hoffman, M.D. (hereinafter referred to as "Hoffman") represented to the Plaintiffs 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 Minor Plaintiff.

2. The Plaintiffs allege that the Defendant Hoffman herein, including duly authorized agents and/or employees of the Defendant Professional Association and/or Hospital, owed to the Minor 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 Minor Plaintiff's condition, careful diagnosis of such condition, employment of appropriate procedures, surgery and/or treatment to correct such conditions without injury upon the Minor Plaintiff, continuous evaluation of the Minor 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 the Defendant failed to do.

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

4. The Plaintiffs allege that the Defendant Teresa Hoffman, M.D. and Associates, LLC, through its agents, servants and employees, owed to the Minor 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 Minor 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 Minor Plaintiff, continuous evaluation of the Minor 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.

5. The Defendant Teresa Hoffman, M.D. and Associates, LLC, 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 Minor Plaintiff's condition, failed to thoroughly evaluate the effects and results of any tests, treatment and/or procedures performed, failed to adjust the Minor Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Minor Plaintiff's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to

determine the nature and extent of the Minor Plaintiff's condition, failed to diagnose the Minor Plaintiff's condition and was otherwise negligent.

6. The Plaintiffs allege that the Defendant Mercy Medical Center (hereinafter referred to as "Hospital"), through its agents, servants and employees, owed to the Minor 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 Minor 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 Minor Plaintiff, continuous evaluation of the Minor 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 Minor Plaintiff's condition, failed to thoroughly evaluate the effects and results of any tests, treatment and/or procedures performed, failed to adjust the Minor Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Minor Plaintiff's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Minor Plaintiff's condition, failed to diagnose the Minor Plaintiff's condition and was otherwise negligent.

8. At all times referred to herein, the Defendant Hoffman 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 Hospital, acting within the scope of her authority.

9. As a direct and proximate result of the negligence of these Defendants and each of them, the Minor Plaintiff suffered unending physical pain, emotional anguish as well as severe disability as is more fully described, hereinbelow.

10. On February 27, 2012, at 1:47 p.m., the Minor Plaintiff's mother, Angola Peay, was a 35-year-old pregnant female who presented to the Defendant Hospital at 37-3/7 weeks' gestation for induction of labor. At all times referred to herein, the Minor Plaintiff and the Plaintiff's mother were under the care of the Defendant Hoffman -- who held herself out to be an expert in obstetrics.

11. At 2:47 p.m., a different obstetrician performed a pelvic examination. An estimated fetal weight of 7 pounds was established and an order for Pitocin was provided. It is alleged that Pitocin is a drug designed to increase the forces of labor and therefore expedite delivery.

12. At 5:40 p.m., the Minor Plaintiff's mother's membranes were ruptured and the fluid was noted to be clear. At 6:56 p.m., a pelvic examination revealed 6 centimeter dilatation, 100% effacement as well as a -3 station. At 8:03 p.m., a pelvic examination was again performed. At that time, the Minor Plaintiff's mother was noted to be 8 centimeters dilated, 100% effaced and at +1 station. At 8:23 p.m., the Minor Plaintiff's mother was noted to be 9.5 centimeters dilated and 100% effaced. A fetal scalp electrode was placed, and at 8:33 p.m., the Pitocin was discontinued.

13. At 8:57 p.m., the Defendant Hoffman made her initial appearance at the bedside and subsequently determined that the Minor Plaintiff's mother was fully dilated.

14. At 8:59 p.m., Pitocin was restarted, with the Minor Plaintiff's mother pushing at 9:09 p.m. At 9:11 p.m., the Defendant Hoffman encountered shoulder dystocia. It is alleged that

shoulder dystocia is a condition, which can occur at the time of vaginal delivery where the fetus becomes entrapped in the birth canal. It is further alleged that the standards of care require appropriate maneuvers and a lack of force or downward traction in order to accomplish the delivery without injuring the baby with particular regard to the nerves of the cervical and brachial plexus. It is asserted that the Defendant herein negligently failed to utilize appropriate techniques in a proper fashion and negligently utilized excessive force and traction during the course of the delivery -- resulting in a severe injury to the Minor Plaintiff's brachial plexus.

15. When the Minor Plaintiff, Dontray Peay, was born at 9:12 p.m., he weighed 8 pounds 3.6 ounces. He was transferred to the Neonatal Intensive Care Unit (NICU) where, upon a newborn examination, the pediatric neurologist found a floppy left arm. In fact, a diagnosis of Erb's Palsy was confirmed prior to the Minor Plaintiff's discharge on March 7, 2012.

16. It is asserted that the Minor Plaintiff was unable to appropriately use his left arm. Therefore, he was subsequently seen at a specialty hospital by a pediatric orthopedic surgeon on May 8, 2012. The surgeon confirmed the diagnosis of Erb's Palsy -- indicating a brachial plexus injury at the level of C5-C6.

17. Therefore, the Minor Plaintiff required surgical intervention by the specialist on November 22, 2013. At that time, the surgeon performed a shoulder tendon transfer and open joint reduction of the glenohumeral joint in an effort to improve the severe Erb's Palsy from which the Minor Plaintiff suffered.

18. It is alleged that had the Defendant and any other hospital personnel caring for the Minor Plaintiff's mother and the Minor Plaintiff acted in accordance with the standards of care, all of the injuries, damages and the severe brachial plexus injury would have been avoided. Specifically, it is alleged that had the delivery been occasioned through the use of appropriate

maneuvers without excessive force and traction, the Minor Plaintiff would have been born in a normal condition without any brachial plexus injury (Erb's Palsy) whatsoever.

19. However, due to the excessive force and traction utilized during the course of delivery -- in continuing violation of the standards of care, the Minor 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 his condition. Additionally, it is alleged that the Minor Plaintiff has in the past, is presently, and will in the future continue to incur surgical, medical, physiotherapeutic, pharmacological, nursing, custodial, and other losses and expenses for which claim is made. It is alleged that the severe and permanent injuries inflicted upon the Minor Plaintiff will prevent him from engaging in normal activities that other minors, toddlers, children, and adults enjoy. He will forced to progress through his life as a one-armed person in a two-armed world. He will be unable to engage in activities enjoyed by others, and will be limited in his ability to hold gainful employment.

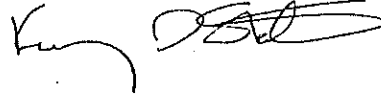
20. Had these Defendants and each of them conformed with the applicable standards of care and avoided the excess traction and force utilized during the course of delivery, it is alleged that the Minor Plaintiff would have been born in the normal fashion as indicated hereinabove, with the Erb's Palsy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

21. The Minor Plaintiff refers to the negligence of these Defendants and each of them as the sole and proximate cause of all of the injuries, damages and severe disability from which he suffers -- with the Plaintiffs and Minor Plaintiff being in no way contributorily negligent.

23. 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.

The Paulton

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Baltimore, Maryland 21202

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Attorneys for the Plaintiffs

ANGOLA PEAY and
DONTA PEAY, SR.,
Parents and Next Friends of
DONTRAY PEAY, Minor

Plaintiffs

v.

TERESA ANN HOFFMAN, M.D., et al

Defendants

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: BALTIMORE CITY
:
: Case No.:

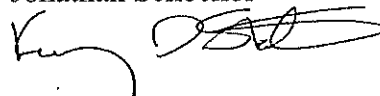
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ELECTION FOR JURY TRIAL

The Plaintiffs in this case elect to try their case before a Jury.



Jonathan Schochor



Kerry D. Staton

Schochor, Federico & Staton, PA

Schochor, Federico and Staton, P.A.

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Attorneys for the Plaintiffs

ANGOLA PEAY and
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DONTRAY PEAY, Minor

Plaintiffs

v.

TERESA ANN HOFFMAN, M.D., et al

Defendants

: IN THE
: CIRCUIT COURT
: FOR
: BALTIMORE CITY
: Case No.: 24-C-17-3450

FILED

JUN 26 2017

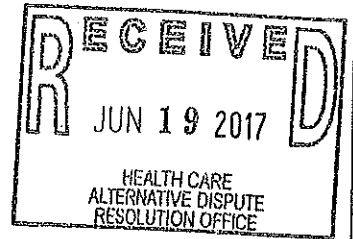
CIVIL DIV.
CIRCUIT COURT FOR
BALTIMORE CITY

: : : : : : : : : : : : : :
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
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jschochor@sfspa.com

Attorneys for the Plaintiffs



ANGOLA PEAY and
DONTA PEAY, SR.,
Parents and Next Friends of
DONTRAY PEAY, Minor

Claimants

v.

TERESA ANN HOFFMAN, M.D., et al

Defendants

: BEFORE THE
: HEALTH CARE
: ALTERNATIVE DISPUTE
: RESOLUTION OFFICE

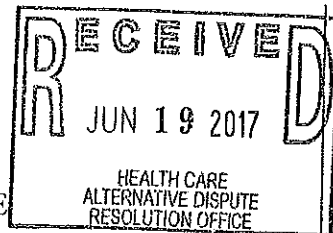
ELECTION FOR WAIVER OF ARBITRATION

COME NOW the Claimants, Angola Peay and Donta Peay, Sr., Parents and Next Friends of Dontray Peay, Minor, by their attorneys, Jonathan Schochor, Kerry D. Staton and Schochor, Federico and Staton, P.A., and file 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 Claimants respectfully represent:

1. The Claimants have 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 - office
(410) 234-1010 - fax



ANGOLA PEAY, ET AL : BEFORE THE
 Claimants : HEALTH CARE
 v. : ALTERNATIVE DISPUTE
 TERESA A. HOFFMAN, M.D., ET AL. : RESOLUTION OFFICE
 Defendants : OF MARYLAND
 : Case No.
 : : : : : : : : : : : :

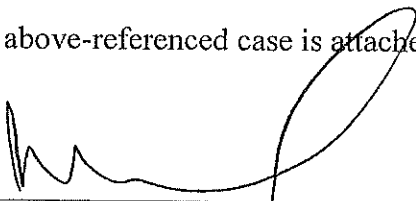
CLAIMANTS' CERTIFICATE OF MERIT

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 Teresa A. Hoffman, M.D., Teresa Hoffman, M.D. and Associates, LLC and Mercy Medical Center, Inc. which have directly and proximately resulted in injuries and damages to the Minor Claimant.

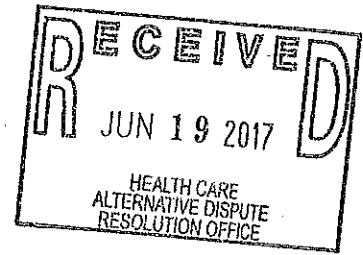
I certify that I am a board-certified expert in obstetrics and gynecology. I further certify that I have had clinical experience, provided consultation relating to clinical practice and/or taught medicine in the Defendant's specialty or a related field of health-care, or in the field of health care in 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.



 Martin Gubernick, M.D.

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



Re: Dontray Peay, 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 Teresa A. Hoffman, M.D., Teresa Hoffman, M.D. and Associates, LLC 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, Teresa A. Hoffman, M.D., acting for herself and as a duly authorized agent and/or employee of the Defendants Teresa Hoffman, M.D. and Associates, LLC and/or Mercy Medical Center was negligent in utilizing excessive traction during the delivery of Dontray resulting in a 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 sustained by Dontray Peay 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,

A handwritten signature in black ink, appearing to read "Martin Gubernick". The signature is written in a cursive style with a large loop at the end.

Martin Gubernick, M.D.

ANGOLA PEAY and DONTA PEAY, SR.,
Parents and Next Friends of
DONTRAY PEAY, Minor

Claimants

v.

TERESA ANN HOFFMAN, M.D., et al.

Health Care Providers

* BEFORE THE
*
* HEALTH CARE
*
* ALTERNATIVE DISPUTE
*
* RESOLUTION OFFICE
*
* HCA No.: 2017-279
*
*

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 21st day of June, 2017, by the Health Care Alternative Dispute Resolution Office,

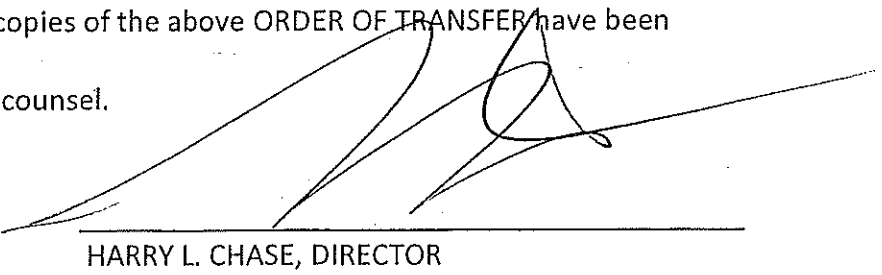
ORDERED, that this case shall be and is hereby, transferred to the United States District Court, or to the Circuit Court of the appropriate venue.



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

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).

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: Peay, et al Plaintiff vs. Hoffman, et al Defendant

PARTY'S NAME: Angola Peay and Donta Peay, Sr., et al **PHONE:** _____

PARTY'S ADDRESS: 831 North Patterson Park Avenue, Baltimore, MD 21205

PARTY'S E-MAIL: _____

If represented by an attorney:

PARTY'S ATTORNEY'S NAME: Jonathan Schochor/Kerry D. Staton **PHONE:** 410-234-1000

PARTY'S ATTORNEY'S ADDRESS: 1211 St. Paul Street, Baltimore, MD 21202

PARTY'S ATTORNEY'S E-MAIL: jschochor@sfspace.com / kstaton@sfspace.com

JURY DEMAND? Yes No

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

ANTICIPATED LENGTH OF TRIAL?: _____ hours 10 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.)

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

- | | | | |
|--|---|--|---|
| <input type="checkbox"/> Abatement | <input type="checkbox"/> Earnings Withholding | <input type="checkbox"/> Judgment-Interest | <input type="checkbox"/> Return of Property |
| <input type="checkbox"/> Administrative Action | <input type="checkbox"/> Enrollment | <input type="checkbox"/> Judgment-Summary | <input type="checkbox"/> Sale of Property |
| <input type="checkbox"/> Appointment of Receiver | <input type="checkbox"/> Expungement | <input type="checkbox"/> Liability | <input type="checkbox"/> Specific Performance |
| <input type="checkbox"/> Arbitration | <input type="checkbox"/> Findings of Fact | <input type="checkbox"/> Oral Examination | <input type="checkbox"/> Writ-Error Coram Nobis |
| <input type="checkbox"/> Asset Determination | <input type="checkbox"/> Foreclosure | <input type="checkbox"/> Order | <input type="checkbox"/> Writ-Execution |
| <input type="checkbox"/> Attachment b/f Judgment | <input type="checkbox"/> Injunction | <input type="checkbox"/> Ownership of Property | <input type="checkbox"/> Writ-Garnish Property |
| <input type="checkbox"/> Cease & Desist Order | <input type="checkbox"/> Judgment-Affidavit | <input type="checkbox"/> Partition of Property | <input type="checkbox"/> Writ-Garnish Wages |
| <input type="checkbox"/> Condemn Bldg | <input type="checkbox"/> Judgment-Attorney Fees | <input type="checkbox"/> Peace Order | <input type="checkbox"/> Writ-Habeas Corpus |
| <input type="checkbox"/> Contempt | <input type="checkbox"/> Judgment-Confessed | <input type="checkbox"/> Possession | <input type="checkbox"/> Writ-Mandamus |
| <input type="checkbox"/> Court Costs/Fees | <input type="checkbox"/> Judgment-Consent | <input type="checkbox"/> Production of Records | <input type="checkbox"/> Writ-Possession |
| <input type="checkbox"/> Damages-Compensatory | <input type="checkbox"/> Judgment-Declaratory | <input type="checkbox"/> Quarantine/Isolation Order | |
| <input type="checkbox"/> Damages-Punitive | <input type="checkbox"/> Judgment-Default | <input type="checkbox"/> Reinstatement of Employment | |

If you indicated *Liability* above, mark one of the following. 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.

MONETARY DAMAGES (Do not include Attorney's Fees, Interest, or Court Costs)

- Under \$10,000 \$10,000 - \$30,000 \$30,000 - \$100,000 Over \$100,000

- Medical Bills \$ _____ Wage Loss \$ _____ Property Damages \$ _____

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 | <input type="checkbox"/> Yes <input type="checkbox"/> No | C. Settlement Conference | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| B. Arbitration | <input type="checkbox"/> Yes <input type="checkbox"/> No | D. Neutral Evaluation | <input type="checkbox"/> Yes <input type="checkbox"/> No |

SPECIAL REQUIREMENTS

- If a Spoken Language Interpreter is needed, check here and attach form CC-DC-041
- If you require an accommodation for a disability under the Americans with Disabilities Act, check here and attach form CC-DC-049

ESTIMATED LENGTH OF TRIAL

With the exception of Baltimore County and Baltimore City, please fill in the estimated LENGTH OF TRIAL.
(Case will be tracked accordingly)

- | | |
|---|--|
| <input type="checkbox"/> 1/2 day of trial or less | <input type="checkbox"/> 3 days of trial time |
| <input type="checkbox"/> 1 day of trial time | <input checked="" type="checkbox"/> More than 3 days of trial time |
| <input type="checkbox"/> 2 days of trial time | |

BUSINESS AND TECHNOLOGY CASE MANAGEMENT PROGRAM

For all jurisdictions, if Business and Technology track designation under Md. Rule 16-308 is requested, attach a duplicate copy of complaint and check one of the tracks below.

- | | |
|---|--|
| <input type="checkbox"/> Expedited- Trial within 7 months of Defendant's response | <input type="checkbox"/> Standard - Trial within 18 months of Defendant's response |
|---|--|

EMERGENCY RELIEF REQUESTED

**COMPLEX SCIENCE AND/OR TECHNOLOGICAL CASE
MANAGEMENT PROGRAM (ASTAR)**

FOR PURPOSES OF POSSIBLE SPECIAL ASSIGNMENT TO ASTAR RESOURCES JUDGES under Md. Rule 16-302, attach a duplicate copy of complaint and check whether assignment to an ASTAR is requested.

- Expedited - Trial within 7 months of Defendant's response Standard - Trial within 18 months of Defendant's response

IF YOU ARE FILING YOUR COMPLAINT IN BALTIMORE CITY, OR BALTIMORE COUNTY, PLEASE FILL OUT THE APPROPRIATE BOX BELOW.

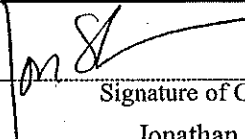
CIRCUIT COURT FOR BALTIMORE CITY (CHECK ONLY ONE)

- Expedited Trial 60 to 120 days from notice. Non-jury matters.
- Civil-Short Trial 210 days from first answer.
- Civil-Standard Trial 360 days from first answer.
- Custom Scheduling order entered by individual judge.
- Asbestos Special scheduling order.
- Lead Paint Fill in: Birth Date of youngest plaintiff _____.
- Tax Sale Foreclosures Special scheduling order.
- Mortgage Foreclosures No scheduling order.

CIRCUIT COURT FOR BALTIMORE COUNTY

- Expedited (Trial Date-90 days) Attachment Before Judgment, Declaratory Judgment (Simple), Administrative Appeals, District Court Appeals and Jury Trial Prayers, Guardianship, Injunction, Mandamus.
- 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.
- 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.
- Complex (Trial Date-450 days) Class Actions, Designated Toxic Tort, Major Construction Contracts, Major Product Liabilities, Other Complex Cases.

6/23/17
Date
1211 Saint Paul Street
Address
Baltimore MD 21202
City State Zip Code


Signature of Counsel / Party
Jonathan Schochor
Printed Name