

WOMEN'S HEALTH ASSOCIATES :
d/b/a ST. JOSEPH MEDICAL CENTER :
7300 York Road, Suite 201 :
Towson, Maryland 21204 :
Serve on Resident Agent: :
The Corporation Trust Incorporated :
300 East Lombard Street :
Baltimore, Maryland 21202 :

C-09-9248

and

KRISTIN L. NEER, R.N. :
6701 North Charles Street :
Towson, Maryland 21204 :

and

GREATER BALTIMORE MEDICAL :
CENTER, INC. :
6701 North Charles Street :
Towson, Maryland 21204 :
Serve on Resident Agent: :
Robert P. Kowal :
6701 North Charles Street :
Towson, Maryland 21204 :

Defendants :

: : : : : : : : : :

COMPLAINT

COUNT I

COME NOW the Plaintiffs, Teresa Hamilton and Terry Cole, Parents and Next Friends of Tiamya Cole, Infant, by their attorneys, Jonathan Schochor, Philip C. Federico, and Schochor, Federico and Staton, P.A. and sue, Harvey H. Kasner, M.D., OB/GYN Specialists of Maryland, LLC, Jeanne Vuich, C.N.M., Women's Health Associates d/b/a St. Joseph Medical Center, Kristin L. Neer, R.N., and Greater Baltimore Medical Center, Inc., Defendants:

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BALTIMORE
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CIVIL DIVISION

aj

1. At all times of which the Plaintiffs complain, the Defendants Kasner, Vuich and Neer represented to the Plaintiff, Infant Plaintiff and the public that they 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 Plaintiffs allege that the Defendants Kasner, Vuich and Neer herein, including duly authorized agents and/or employees of the Defendant Hospital and/or medical corporations, owed to the Plaintiff and Infant 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 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 Plaintiff and Infant Plaintiff, continuous evaluation of the Plaintiff 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 Defendants failed to do.

3. The Defendants Kasner, Vuich and Neer were negligent in that they failed to employ appropriate treatment, surgery, tests and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff and Infant Plaintiff's condition, failed to properly and appropriately diagnose the Plaintiff 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 and Infant Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff 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 and Infant Plaintiff's condition, and were otherwise negligent.

4. The Plaintiffs allege that the Defendants OB/GYN Specialists of Maryland, LLC, and Women's Health Associates d/b/a St. Joseph Medical Center, 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 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 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 OB/GYN Specialists of Maryland, LLC, and Women's Health Associates d/b/a St. Joseph Medical Center, 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 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 and Infant Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff 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 and Infant Plaintiff's condition, failed to diagnose the Plaintiff and Infant Plaintiff's condition and were otherwise negligent.

6. The Plaintiffs allege that the Defendant Greater Baltimore 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 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 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 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 and Infant Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff 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 and Infant Plaintiff's condition, failed to diagnose the Plaintiff and Infant Plaintiff's condition and was otherwise negligent. At all times referred to herein, the Defendant Harvey H. Kasner, M.D. acted for himself and as a duly authorized agent and/or employee of the Defendant OB/GYN Specialists of Maryland, LLC and/or the Defendant Hospital, acting within the scope of his authority. At all times referred to

herein, the Defendant Jeanne Vuich, C.N.M. acted for herself and as a duly authorized agent and/or employee of the Defendant OB/GYN Specialists of Maryland, LLC and/or the Defendant Women's Health Associates d/b/a St. Joseph Medical Center and/or the Defendant Hospital, acting within the scope of her authority. At all times referred to herein, the Defendant Kristin L. Neer, R.N. acted for herself and as a duly authorized agent and/or employee of the Defendant Hospital, acting within the scope of her authority.

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

9. On May 9, 2008, the Plaintiff, Teresa Hamilton, presented to the Defendant Hospital reporting a spontaneous rupture of her membranes and the onset of contractions which had increased in intensity. At all times referred to herein, the Defendant Kasner acted as the Plaintiff's obstetrician. After triage examination, the Plaintiff was found to be one centimeter dilated, 80% effaced, with her baby at the -2 station. The baby's heart tracing was reactive, and normal at 120 beats per minute.

10. The Defendant Kasner was consulted via telephone at approximately 10:20 p.m. and the Plaintiff was instructed to walk for a matter of hours after which a repeat pelvic examination would be completed. The Plaintiff did as instructed and at approximately 1:00 a.m. on May 10, 2008, was re-examined. At approximately 1:30 a.m., the Plaintiff's cervix was two centimeters dilated, 90% effaced, with the baby positioned at the -2 station. The Defendant Kasner ordered admission for the Plaintiff and the administration of Pitocin and epidural anesthesia. It is alleged that Pitocin is a drug designed to augment the intensity of labor contractions and expedite a vaginal delivery.

11. At 1:50 a.m., the Plaintiff was transferred to the Labor and Delivery Department of the Defendant Hospital, and at 2:30 a.m., anesthesia placed the epidural. Pitocin was initiated at 2:43 a.m. At 5:40 a.m., positive scalp stimulation following vaginal examination was documented -- indicating the ongoing well-being of the baby. The Defendant Kasner had previously been telephoned and was en route to the Defendant Hospital at that time.

12. At 6:04 a.m., a true emergency occurred. The baby's heart rate suddenly dropped down to the level of 60 beats per minute -- indicating a sudden drop in oxygenation to the baby and the need for an emergent delivery. Given the emergency as documented, the standards of care required Defendant Neer and/or other nursing staff at the Defendant Hospital to contact a medical practitioner capable of completing an emergent, operative delivery if necessary. The Defendant Neer called a Certified Nurse Midwife, the Defendant Vuich, to the bedside.

13. Further, it is alleged that when the Defendant Vuich arrived at the bedside, she took no effective action to complete a delivery. If she was trained in the use of a vacuum extractor, it should have been utilized on an emergency (or STAT) basis. It was not. Further, the Defendant Vuich delayed placing a scalp electrode to more accurately monitor the baby's heart rate. Although the Defendant Vuich arrived at the bedside at 6:08 a.m., a scalp electrode was not placed until 6:15 a.m.

14. At 6:16 a.m., while this emergency continued unabated, the Defendant Vuich was still having difficulty obtaining a fetal heart rate and called for a bedside sonogram. Again, all this accomplished was wasting precious time while the unborn baby lost necessary oxygen to her vital organs and particularly, her brain. When the sonogram was finally performed, it only confirmed the heart rate at the level of 60 beats per minute as documented at 6:04 a.m.

15. Finally at 6:16 a.m., the covering physicians, present at the Defendant Hospital to

handle such emergencies were contacted. Immediately thereafter, the Defendant Kasner arrived to find that the baby's fetal heart rate remained at the level of 60 beats per minute. He performed a central episiotomy at 6:21 a.m., applied a vacuum extractor, and successfully delivered the baby, Infant Plaintiff Tiamya Cole, at 6:23 a.m.

16. Predictably, the Infant Plaintiff's APGAR scores were 1 at one minute, 3 at five minutes, and 3 at ten minutes -- documenting an acute anoxic event which resulted in overwhelming oxygen deprivation and brain injury as a result. At the time of delivery, the baby was limp, pale, and apneic. She was suctioned as well as stimulated and provided blow-by oxygen prior to intubation. She was subsequently admitted to the Neonatal Intensive Care Unit (NICU). Predictably, due to the severe brain injury sustained, the Infant Plaintiff suffered seizures, requiring the utilization of Phenobarbitol. Later that morning, the Infant Plaintiff required transport to a special tertiary hospital for continued care. The Infant Plaintiff remained at that institution until July 3, 2008, at which time she was discharged to a long-term pediatric hospital for extended residential care. Her discharge diagnosis included perinatal depression with hypoxic ischemic encephalopathy due to the deprivation of oxygen suffered as the result of these Defendants' failure to accomplish a STAT or emergency delivery.

17. After an extended stay at the residential hospital, the Infant Plaintiff was finally discharged to her home with a tracheostomy as well as gastronomy tube. It is alleged that the Infant Plaintiff has suffered overwhelming and irreversible brain injury as a result of the negligence of these Defendants. She will not enjoy a normal childhood, will not grow into a normal adult, will not attend normal schools, will not enjoy activities each of us take for granted in our daily lives, will not marry, will not be a productive citizen, will not have children, and will require assistance on a 24-hour 7-day-a-week basis for her entire lifespan -- all as the result of

the negligence of these Defendants.

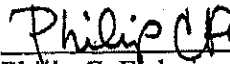
18. Had these Defendants and each of them acted in accordance with the standards of care, it is alleged that an emergent (STAT) delivery would have been accomplished immediately after the documented fall in the baby's heart rate to a level of 60 beats per minute -- with all of the injuries, damages and disability being avoided.

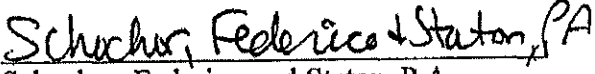
19. It is alleged that the Infant Plaintiff has in the past, is presently and will in the future continue to suffer unending physical pain, emotional anguish as well as fear and anxiety over her condition. Additionally, she has in the past, is presently and will in the future continue to incur hospital, surgical, pharmaceutical, physiotherapeutic, nursing, custodial and other losses and expenses for which claim is made.

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

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


Jonathan Schochor


Philip C. Federico


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

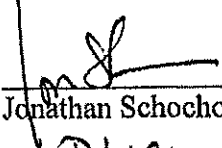
COUNT II

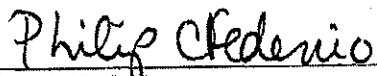
COMES NOW the Plaintiff, Teresa Hamilton, by her attorneys, Jonathan Schochor, Philip C. Federico, and Schochor, Federico and Staton, P.A. and sues, Harvey H. Kasner, M.D., OB/GYN Specialists of Maryland, LLC, Jeanne Vuich, C.N.M., Women's Health Associates d/b/a St. Joseph Medical Center, Kristin L. Neer, R.N., and Greater Baltimore Medical Center, Inc., Defendants:

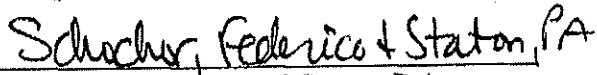
1. The Plaintiff incorporates in this Count those facts set forth in Count I hereinabove by reference thereto intending that each and every allegation hereinabove be deemed part hereof as if the same were repeated herein.

2. As the direct and proximate result of the negligence of these Defendants, 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 County. Venue is claimed in Baltimore County. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).


Jonathan Schochor


Philip C. Federico


Schochor, Federico and Staton, P.A.

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

Attorneys for the Plaintiffs

COUNT III

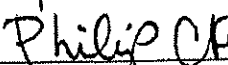
COMES NOW the Plaintiff, Terry Cole, by his attorneys, Jonathan Schochor, Philip C. Federico, and Schochor, Federico and Staton, P.A. and sues, Harvey H. Kasner, M.D., OB/GYN Specialists of Maryland, LLC, Jeanne Vuich, C.N.M., Women's Health Associates d/b/a St. Joseph Medical Center, Kristin L. Neer, R.N., and Greater Baltimore Medical Center, Inc.,
Defendants:


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

2. As the direct and proximate result of the negligence of these Defendants, 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 County. Venue is claimed in Baltimore County. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).


Jonathan Schochor


Philip C. Federico


Schochor, Federico and Staton, P.A.

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

Attorneys for the Plaintiffs

TERESA HAMILTON and
TERRY COLE, Parents and
Next Friends of
TIAMYA COLE, Infant, et al

Plaintiffs

v.

HARVEY H. KASNER, M.D., et al

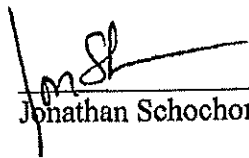
Defendants

: IN THE
:
: CIRCUIT COURT
:
: FOR
:
: BALTIMORE COUNTY
:
: Case No.:


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

ELECTION FOR JURY TRIAL

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


Jonathan Schochor


Philip C. Federico


Schochor, Federico and Staton, P.A.
The Paulton
1211 St. Paul Street
Baltimore, Maryland 21202
(410) 234-1000

Attorneys for the Plaintiffs

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COURT OF THE CIRCUIT COURT
BALTIMORE COUNTY

TERESA HAMILTON and
TERRY COLE, Parents and
Next Friends of
TIAMYA COLE, Infant, et al

Claimants

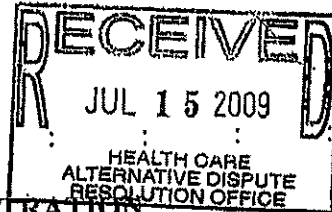
v.

HARVEY H. KASNER, M.D., et al

Defendants

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


: HCA No.:

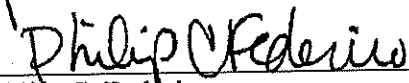


ELECTION FOR WAIVER OF ARBITRATION

COME NOW the Claimants, Teresa Hamilton and Terry Cole, Individually and as Parents and Next Friends of Tiamya Cole, Infant, by their attorneys, Jonathan Schochor, Philip C. Federico 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:

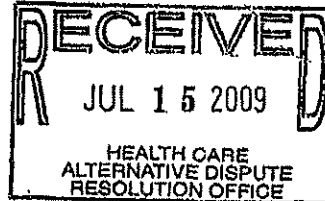
1. The Claimants have elected to waive arbitration in the above-captioned case to save time and expense associated herewith.
2. That after filing, this election shall be binding on all parties.


Jonathan Schochor


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

Mark B. Landon, M.D.
2050 Kenny Road
Columbus, OH 43221

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



Re: Tiamya Cole, Infant

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 Harvey H. Kasner, M.D., OB/GYN Specialists of Maryland, LLC, Jeanne Vuich, C.N.M., Women's Health Associates d/b/a St. Joseph's Medical Center, Kristin L. Neer, R.N., and Greater Baltimore Medical Center, Inc. which have directly and proximately resulted in damages and injuries to the Infant Claimant.

At 9:45 p.m. on May 9, 2008, Claimant Hamilton presented to Defendant Greater Baltimore Medical Center reporting a spontaneous rupture of membranes at 5:00 a.m., and the onset of contractions at 5:00 p.m. – which had increased in intensity and were occurring every 2-3 minutes. At this time, she was at thirty-nine weeks and two days gestation. Upon triage examination, Claimant Hamilton was 1 cm dilated, 80% effaced, with the baby at the -2 station. The fetal heart tracing was reactive, and the baby's heart rate was documented as 120 beats per minute.

Defendant Kasner was consulted via telephone at 10:20 p.m., and Claimant Hamilton was given instructions to walk around with a pad for two hours prior to repeat speculum examination. At 1:30 a.m., a speculum examination was positive for nitrazim, fern, and pooling. Claimant Hamilton's cervix was 2 cm dilated, 90% effaced, and the baby was located at the -2 station. Defendant Kasner ordered her admission, and the initiation of epidural anesthesia and pitocin.

At 1:50 a.m., Claimant Hamilton was transferred to labor and delivery. At 2:10 a.m., she received 2 g of intravenous ampicillin for Group B streptococcus prophylaxis, and at 2:30 a.m. anesthesia placed an epidural. Pitocin was initiated at 2:43 a.m. At 3:02

a.m., a vaginal examination documented 2 cm dilatation, 80% effacement, and the baby at the -1 station. At 5:35 a.m., Claimant Hamilton reported increased pain and rectal pressure, and a bulging bag of waters was documented on vaginal examination. Defendant Kasner was called, and was en route to the hospital. At 5:40 a.m., positive scalp stimulation following vaginal examination was documented. At 6:04 a.m., the fetal heart rate dropped down to 60 beats per minute, and Defendant Neer called Defendant Vuich to the bedside. Fluid observed at time of membrane rupture was clear, and no cord was palpated. At 6:15 a.m., Defendant Vuich placed a scalp electrode to assist with monitoring the baby's heart rate. At 6:16 a.m., Defendant Vuich continued to have difficulty obtaining a fetal heart rate, and she called out for a bedside sonogram. Another nurse midwife performed a sonogram that documented a heart rate in the 60s. At this time, Defendant Neer called Drs. Elberfeld and Nguyen to the bedside. Supplemental oxygen was provided by facemask. At 6:20 a.m., Defendant Kasner arrived to find the fetal heart rate in the 60s. Upon examination, he documented the baby at the +3 station. He performed a central episiotomy, and, at 6:21 a.m. applied the kiwi vacuum. The vacuum popped off, but was reapplied, and at 6:23 a.m., Defendant Kasner successfully delivered the Infant Claimant with the assistance of one single gentle traction.

At delivery, the Infant Claimant's APGAR scores were 1 at one minute, 3 at five minutes, and 3 at ten minutes. She was delivered limp, pale, and apneic. She was suctioned, stimulated, and given blow by oxygen prior to intubation. Copious secretions and meconium staining were observed. Following intubation by pediatrics, her color and heart rate improved, but no improvement in respiratory function, movement, or grimace was documented. The Infant Claimant was admitted to the neonatal intensive care unit with diagnoses of severe perinatal depression and suspected sepsis. Within hours of delivery, the Infant Claimant suffered seizures, and phenobarbital was administered. At 8:35 a.m., the Infant Claimant was transported to Johns Hopkins Hospital for continued neonatal intensive care.

It is my opinion that the Defendants breached the applicable standards of care in the following ways: (1) at 6:04 a.m., following the precipitous drop in the fetal heart rate, Defendant Neer failed to immediately page appropriate personnel capable of performing an emergent delivery; (2) after being paged at 6:04 a.m., Defendant Vuich failed to arrive at the bedside until 6:08 a.m.; (3) after arriving at the bedside, Defendant Vuich failed to place the fetal scalp electrode in a timely manner; and (4) Defendants Neer and Vuich failed to perform an emergent delivery via vacuum extractor at 6:08 a.m. and/or failed to page an obstetrician to execute same at 6:08 a.m. These breaches in the applicable standards of care resulted in a period of prolonged fetal bradycardia, and severe and permanent neurological damage to the Infant Claimant. Additionally, I incorporate the Complaint filed in this case by reference.

I certify that I am a board-certified expert in obstetrics and gynecology with a sub-specialty in maternal-fetal medicine. 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 Claimant Hamilton and the Infant

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 that reads "Mark B. Landon MD". The signature is written in a cursive, flowing style.

Mark B. Landon

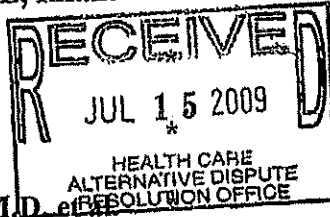
TERESA HAMILTON AND,
TERRY COLE, Parents and Next
Friends of TIAMYA COLE, Infant

Plaintiffs

v.

HARVEY H. KASNER, M.D., et al.

Defendants



BEFORE THE HEALTH
CLAIMS ALTERNATIVE
DISPUTE RESOLUTION
OFFICE OF MARYLAND

HCA 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.

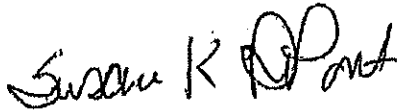
I hereby certify and acknowledge that there have been violations of the standards of care by Harvey H. Kasner, M.D., OB/GYN Specialists of Maryland, LLC, Jeanne Vuich, C.N.M., Women's Health Associates d/b/a St. Joseph's Medical Center, Kristin L. Neer, R.N., and Greater Baltimore Medical Center, Inc. which have directly and proximately resulted in damages and injuries to the Infant Claimant.

I certify that I am a board-certified expert in obstetrics and gynecology with a subspecialty in maternal-fetal medicine. 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 Claimants' Decedent, 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.



Mark B. Landon, M.D.





SUSAN K. DUPONT
Notary Public, State of Ohio
My Commission Expires 02-03-2013

IN THE HEALTH CARE ALTERNATIVE DISPUTE RESOLUTION OFFICE

*

TERESA HAMILTON, et al.

*

Claimants

HCA No.: 2009-354

Vs.

*

HARVEY H. KASNER, MD, et al.

*

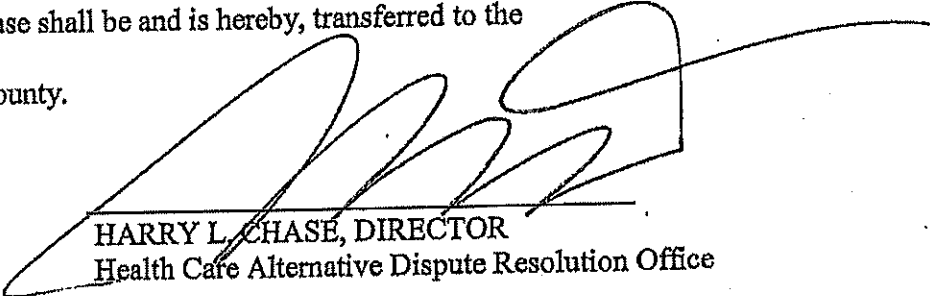
Health Care Providers

* * * * *

ORDER OF TRANSFER

The Claimants, having elected a Waiver of Arbitration under the provisions of the Annotated Code of Maryland, Courts and Judicial Proceedings Article, Section 3-2A-06B it is this 27th Day of July, 2009, by the Health Care Alternative Dispute Resolution Office,

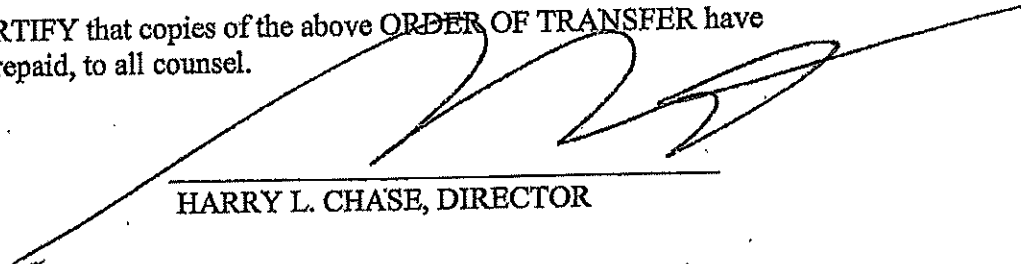
ORDERED that this case shall be and is hereby, transferred to the Circuit Court for Baltimore County.



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