RONNETTA CRAIG
8308 Tinsley Rd.
Baltimore, MD 21244,

Plaintiff

v.

SINAI HOSPITAL
2401 W. Belvedere Ave.
Baltimore, MD 21215,

KAREN ENGSTROM, M.D.
Sinai Hospital
2401 W. Belvedere Ave.
Baltimore, MD 21215,

THOMAS GENUIT, M.D.
Sinai Hospital
2401 W. Belvedere Avenue
Baltimore, MD 21215,

KIMBERLY WALKER, M.D.
Sinai Hospital
2401 W. Belvedere Avenue
Baltimore, MD 21215,

TOLA OMOTOSHO, M.D.
Sinai Hospital
2401 W. Belvedere Avenue
Baltimore, MD 21215,

ELENA DOLSKAYA, M.D.
Sinai Hospital
2401 W. Belvedere Avenue
Baltimore, MD 21215

SUSAN WYATT, M.D.
Sinai Hospital
2401 W. Belvedere Avenue
Baltimore, MD 21215,

Defendants

* IN THE CIRCUIT COURT

* FOR BALTIMORE COUNTY

* Case No. C-10-11958

* * * * * * * * * * * * * *

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2010 OCT 18 PM 2:52
CLERK OF THE CIRCUIT COURT
BALTIMORE COUNTY

COMPLAINT FOR DAMAGESAND DEMAND FOR JURY TRIAL

Ronnetta Craig ("Craig"), Plaintiff, by and through her attorney, David F. Albright, Esq. sues Sinai Hospital, Karen A. Engstrom, M.D., Thomas Genuit, M.D., Kimberly Walker, M.D., Tola Omotosho, M.D., Elena Dolskaya, M.D., and Susan Wyatt, M.D., ("Health Care Providers"), Defendants, and states the following:

1. Plaintiff Craig is a resident of Baltimore County, Maryland.

2. Defendants are Health Care Providers with their principal places of business in Baltimore City, Maryland.

3. Plaintiff Craig filed a claim with the Health Care Alternative Dispute Resolution Office on October 18, 2007, with allegations of lack of informed consent.

4. Defendants waived arbitration on June 24, 2008.

5. The case was transferred to Baltimore County on June 30, 2008.

FACTUAL BACKGROUND

6. Plaintiff Craig was admitted to Sinai Hospital in Baltimore, MD with severe abdominal pain on October 16, 2004. After several days of tests, the doctors told her that she needed exploratory surgery to find out the source of the pain.

7. Although the medical providers asked her to sign a limited consent form, which she did, the medical providers represented to her that they would not remove any organs unless there was something wrong with the organ; she did not give her informed consent.

8. The surgery was performed on October 19, 2004. After a four and one half hour surgery, not including time in the recovery room, the Defendants, among other things, did a full hysterectomy and also removed her appendix.

9. Ms. Craig has been told by her gynecologist that there was nothing wrong with her uterus, or appendix and that what the medical providers could have done was remove her right ovary only, because there was a cyst on that ovary. This statement is consistent with the medical reports.

10. As a result of the operation, Ms. Craig has medical problems including problems with her bladder and incontinence. She has experienced emotional problems because she is unable to have more children, and she is going through early menopause.

11. When she consented to the operation, Ms. Craig relied on the promises of the Defendants that they would not remove her organs unless they had no other choice. The Defendants ignored their promises and removed Ms. Craig's reproductive organs despite their promises.

12. By failing to properly warn Ms. Craig under what conditions they would remove her reproductive organs, the Defendants did not acquire Ms. Craig's informed consent.

COUNT I
(Lack of Informed Consent)

13. The allegations of paragraphs 1 through 12 of this Complaint are incorporated herein by reference.

14. The consent that Ms. Craig gave to the Defendants was not informed consent. The Defendants did not explain the procedure adequately to Ms. Craig and warn her of material risks and dangers of the surgery. They did not warn Ms. Craig under what conditions they would remove her reproductive organs. Because of this lack of

information, Ms. Craig could not make an intelligent and informed choice about whether or not to have surgery.

15. The Defendants had the duty to give Ms. Craig all of the information to make an intelligent and informed choice about the surgery. The lack of Defendants to inform Ms. Craig has harmed her. Ms. Craig no longer has her uterus and ovaries, is unable to conceive more children, has problems with incontinence and suffers emotionally as a result.

WHEREFORE, Ms. Craig demands judgment against the Defendants for compensatory damages of $100,000.00.

David F. Albright, Esq.
The Law Offices of David F. Albright
1122 Kenilworth Drive
Suite 500
Baltimore, Maryland 21204
(410) 823-5455
Attorney for Plaintiff

DEMAND FOR JURY TRIAL

Plaintiff Craig demands a trial by jury of any and all issues so triable in this case.

David F. Albright, Esq.
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1122 Kenilworth Drive
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(410) 823-5455
Attorney for Plaintiff

Case: 03-C-10-011958
CF-Civil Fili
$50.00
Appearance Fee
$10.00
MLSC
$55.00
TOTAL $145.00

COMMENT:
Craig Vs. Sinai Hospital, et al

Receipt #
Cashier: CPN
10/08/10 4:15pm

The Law Offices of

DAVID F. ALBRIGHT

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October 8, 2010

VIA HAND DELIVERY
Clerk of the Circuit Court
County Courts Bldg.
401 Bosley Avenue
Towson, MD 21204-0754

RE: Ronnetta Craig v. Sinai Hospital, et al.

Dear Clerk:

Please accept for filing in the above matter, the enclosed Complaint and a check for the filing fee. Please date stamp and return the copy with the messenger.

Thank you.

Sincerely,

David F. Albright, Esq.

Enclosures