

PATRICIA A. MANGUS
12322 Eastern Avenue
Apt. A
Baltimore, MD 21220

And

JOHN C. MANGUS
12322 Eastern Avenue
Apt. A
Baltimore, MD 21220

Plaintiffs

v.

BRIDGET D. ROOTS, M.D.
1556 Laurel Drive
Mountain Top, PA 18707

And.

HELIXCARE MEDICAL GROUP, LLC
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND ASSOCIATES
and/or WOMEN'S CARE OB/GYN
and/or MEDSTAR PHYSICIAN PARTNERS
and/or NICOLA LONDON, M.D.
9600 Pulaski Park Drive, Suite 103
Baltimore, MD 21220

Serve On:

Resident Agent,
Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

MEDSTAR PHYSICIAN PARTNERS
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or WOMEN'S
CARE OB/GYN and/or NICOLA
LONDON, M.D.

*
* IN THE
* CIRCUIT COURT
* FOR
* BALTIMORE COUNTY
* Civil No. C-05-2261

RECEIVED AND FILED

05 FEB 25 1989

CLERK OF DISTRICT COURT
BALTIMORE, MARYLAND

ay.

PS.

1000

ff

9600 Pulaski Park Drive, Suite 103
Baltimore, MD 21220 *

Serve on:

Resident Agent, *

Robert J. Ryan *

5565 Sterrett Place *

5th Floor *

Columbia, MD 21044 *

And *

DRS. LONDON & ROOTS *

d/b/a WOMEN'S CARE OB/GYN *

and/or DR. LONDON AND *

ASSOCIATES and/or MEDSTAR *

PHYSICIAN PARTNERS and/or *

NICOLA LONDON, M.D. *

1576 Merritt Blvd. *

Baltimore, MD 21222 *

Serve on:

Resident Agent, *

Robert J. Ryan *

5565 Sterrett Place *

5th Floor *

Columbia, MD 21044 *

And *

DR. LONDON AND ASSOCIATES *

d/b/a WOMEN'S CARE OB/GYN and/or *

DRS. LONDON & ROOTS and/or *

MEDSTAR PHYSICIAN PARTNERS and/or *

NICOLA LONDON, M.D. *

1576 Merritt Blvd. *

Baltimore, MD 21222 *

Serve on:

Resident Agent, *

Robert J. Ryan *

5565 Sterrett Place *

5th Floor *

Columbia, MD 21044 *

And *

WOMEN'S CARE OB/GYN
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or MEDSTAR
PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.

1576 Merritt Blvd.
Baltimore, MD 21222

Serve on:

Resident Agent,
Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

NICOLA LONDON, M.D.
1576 Merritt Blvd.
Baltimore, MD 21222

Defendants

* * * * *

COMPLAINT AND ELECTION FOR JURY TRIAL

Patricia A. Mangus and John C. Mangus, husband and wife,
Plaintiffs, by their attorneys, hereby sue Bridget D. Roots, M.D.;
Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr.
London and Associates and/or Women's Care Ob/Gyn and/or Medstar
Physician Partners and/or Nicola London, M.D.; Medstar Physician
Partners d/b/a Drs. London & Roots and/or Dr. London and Associates
and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London
& Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates

and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and Nicola London, M.D., Defendants, and state the following as their causes of action:

1. The amount of this claim for damages due to medical malpractice is in excess of Twenty-Five Thousand Dollars (\$25,000.00), and venue is proper in Baltimore County, Maryland.

2. This action was originally filed in the Health Claims Arbitration Office of Maryland on June 24, 2004. The Certificate of a Qualified Expert was filed on December 10, 2004, a copy of which is attached hereto as Exhibit A. On December 30, 2004, the Plaintiffs filed an Election to Waive Arbitration with the Health Claims Arbitration Office, a copy of which is attached hereto as Exhibit B. The Plaintiffs filed a Supplemental Certificate of Qualified Expert on February 8, 2005, a copy of which is attached hereto as Exhibit C.

3. The Plaintiffs, Patricia A. Mangus and John C. Mangus, are husband and wife, and are citizens and residents of Baltimore County, Maryland, residing at 12322 Eastern Avenue, Apt. A,

Baltimore, MD 21220.

4. At all times material hereto, Defendant, Bridget D. Roots, M.D., was a citizen of the State of Maryland, and was a physician licensed to practice medicine in the State of Maryland with offices in Baltimore, Maryland, located at 1576 Merritt Blvd. Dr. Roots is board certified in obstetrics and gynecology.

5. At all times material hereto, Defendant, Helixcare Medical Group, LLC, was and is a corporation of the State of Maryland with its principal place of business in Baltimore County, Maryland. Helixcare Medical Group, LLC, was a Health Care Provider carrying on a regular business as Dr. London & Associates and/or Drs. London & Roots and/or Women's Care Ob/Gyn and/or Medstar Physician Partners, and/or Nicola London, M.D., in Baltimore County, Maryland, located at 1576 Merritt Blvd., Suite 3, Baltimore, Maryland 21222.

6. At all times material hereto, Defendant, Helixcare Medical Group, LLC, was and is a Health Care Provider carrying on a regular business in Baltimore County, Maryland, whose agents, servants, and employees undertook to provide services to the Claimant, Patricia A. Mangus, relative to her care and treatment and is thus subject to the jurisdiction of the Health Claims Arbitration Office and the Courts of this State.

7. At all times material hereto, Defendant, Medstar Physician Partners d/b/a Dr. London and Associates and/or Drs. London & Roots and/or Women's Care Ob/Gyn and/or Nicola London, M.D., was a business entity of unknown form organized under the laws of the State of Maryland with its principal place of business in Baltimore County, Maryland.

8. At all times material hereto, Defendant, Medstar Physician Partners d/b/a Dr. London and Associates and/or Drs. London & Roots and/or Women's Care Ob/Gyn and/or Nicola London, M.D., was a Health Care Provider carrying on a regular business in Baltimore County, Maryland, whose agents, servants, and employees undertook to provide services to the Claimant, Patricia A. Mangus, relative to her care and treatment and is thus subject to the jurisdiction of the Health Claims Arbitration Office and the Courts of this State.

9. At all times material hereto, Defendant, Drs. London & Roots d/b/a Dr. London and Associates and/or Medstar Physician Partners and/or Women's Care Ob/Gyn and/or Nicola London, M.D., was a business entity of unknown form organized under the laws of the State of Maryland with its principal place of business in Baltimore County, Maryland.

10. At all times material hereto, Defendant, Drs. London &

Roots d/b/a Dr. London and Associates and/or Medstar Physician Partners and/or Women's Care Ob/Gyn and/or Nicola London, M.D., was a Health Care Provider carrying on a regular business in Baltimore County, Maryland, whose agents, servants, and employees undertook to provide services to the Claimant, Patricia A. Mangus, relative to her care and treatment and is thus subject to the jurisdiction of the Health Claims Arbitration Office and the Courts of this State.

11. At all times material hereto, Defendant, Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D., was a business entity of unknown form organized under the laws of the State of Maryland with its principal place of business in Baltimore County, Maryland.

12. At all times material hereto, Defendant, Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D., was a Health Care Provider carrying on a regular business in Baltimore County, Maryland, whose agents, servants, and employees undertook to provide services to the Claimant, Patricia A. Mangus, relative to her care and treatment and is thus subject to the jurisdiction of the Health Claims Arbitration Office and the Courts of this

State.

13. At all times material hereto, Defendant, Women's Care Ob/Gyn d/b/a Medstar Physician Partners and/or Dr. London and Associates and/or Drs. London & Roots and/or Nicola London, M.D., was a business entity of unknown form organized under the laws of the State of Maryland with its principal place of business in Baltimore County, Maryland.

14. At all times material hereto, Defendant, Women's Care Ob/Gyn d/b/a Dr. London and Associates and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D., was a Health Care Provider carrying on a regular business in Baltimore County, Maryland, whose agents, servants, and employees undertook to provide services to the Claimant, Patricia A. Mangus, relative to her care and treatment and is thus subject to the jurisdiction of the Health Claims Arbitration Office and the Courts of this State.

15. At all times material hereto, Defendant, Nicola London, M.D., was a citizen of the State of Maryland, and was a physician licensed to practice medicine in the State of Maryland with offices in Baltimore, Maryland, located at 1576 Merritt Blvd.

16. At all times material hereto, Bridget Roots, M.D., was an agent, servant, and/or employee, and was acting within the scope of

her employment with Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician Partners d/b/a Dr. London and Associates and/or Drs. London & Roots and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and/or Nicola London, M.D. Said Health Care Provider is a medical doctor and had actual, expressed, implied, ostensible, and/or apparent authority to act on their behalf as their agent, servant, and/or employee.

17. On October 11, 2000, Plaintiff, Patricia A. Mangus, who was then known as Patricia A. Gudknecht, was admitted to Franklin Square Hospital Center under the care of Health Care Provider, Bridget D. Roots, M.D., by reason of multiparity and undesired fertility. Dr. Roots performed a laparoscopy and tubal electrocautery, for the express purpose of rendering Mrs. Mangus infertile.

18. Upon completion of the surgery, Mrs. Mangus was discharged, and, upon a follow up visit with Dr. Roots, she was told that everything seemed to be in good condition and that her incision was healing well.

19. On or about June 25, 2001, Mrs. Mangus was examined by Nicola London, M.D., at which time an ultrasound was performed which showed that Mrs. Mangus was 21.8 weeks in gestation.

20. Mrs. Mangus gave birth to an infant girl on October 24, 2001.

21. On October 25, 2001, Dr. London performed a bilateral tubal ligation. During said surgery, the right fallopian tube was identified, followed out to the fimbriated end, and was lifted in order that the fimbridectomy could be performed. During this procedure, Dr. London found that although there was some evidence of cauterization it was inadequate in that there was no through scar in the tube and the tube was patent on the right side. Therefore, the laparoscopy and bilateral electrocautery failed to render Mrs. Mangus infertile which resulted in her unplanned pregnancy and birth of an infant on October 24, 2001.

COUNT I

Negligence

(Patricia A. Mangus vs. All Defendants)

Patricia A. Mangus sues Bridget D. Roots, M.D.; Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician Partners d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and Nicola London, M.D., Defendants.

22. The Plaintiff incorporates by reference Paragraphs 1 through 21 of this Complaint, as if the same were set forth in full herein.

23. The Defendants owed a duty to Patricia Mangus to exercise due care in their medical care and treatment of her.

24. The Defendants, through their agents, servants, and employees, were negligent, breached their duty of care, and deviated from the standard of care in the manner in which they provided care and treatment to Patricia Mangus, including, but not

limited to, the following:

- a. failed to properly perform the laparoscopy and bilateral tubal electrocautery procedure upon Mrs. Mangus;
- b. failed to use appropriate procedures to correctly perform Mrs. Mangus's laparoscopy and bilateral tubal electrocautery;
- c. failed to completely close the right fallopian tube whereupon it remained patent, and thus, failed to make Mrs. Mangus infertile;
- d. failed to promptly and timely recognize that they had, in error, failed to occlude the right fallopian tube with cauterization; and, thus, failed to make Mrs. Mangus infertile;
- e. failed to perform a bilateral tubal ligation, or use other procedures or methods to stop Plaintiff's fertility;
- f. failed to fully inform Plaintiff as to the availability and appropriateness of the bilateral tubal ligation, or other available procedures or methods;
- g. failed to fully inform the Plaintiff as to the risks of the laparoscopy and bilateral tubal electrocautery including the risk that this procedure could fail to make her infertile, the benefits of the procedures, the availability of other methods or procedures, and/or the expected and intended results of the

selected procedure, whereupon Dr. Roots did not obtain the necessary informed consent for this procedure; and

h. were otherwise negligent, breached their duty of care, and deviated from the standard of care in their care and treatment of Patricia Mangus.

25. The Health Care Providers' negligence and deviations from the standard of care as described above, proximately caused injury to the Plaintiff, Patricia A. Mangus, in that it denied her the right to decide whether to bear a child, the anguish and emotional and mental suffering of carrying and giving birth to an unplanned child, the anguish and emotional and mental suffering of raising an unplanned child, the financial impact related to caring for and raising an unplanned child and was otherwise injured and damaged.

26. The Plaintiff further alleges that the injuries and damages herein complained of were proximately caused by the negligence and want of care of the Defendants, without any negligence on the Plaintiff's part contributing thereto.

WHEREFORE, the Plaintiff, Patricia A. Mangus, claims compensatory damages against Defendants, Bridget D. Roots, M.D.; Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician

Partners d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and Nicola London, M.D., in excess of Twenty-Five Thousand Dollars (\$25,000.00).

COUNT II

Negligence

(John C. Mangus vs. All Defendants)

John C. Mangus sues Bridget D. Roots, M.D.; Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician Partners d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots

and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and Nicola London, M.D., Defendants.

27. The Plaintiff incorporates by reference Paragraphs 1 through 21, 23, and 24 of this Complaint, as if the same were set forth in full herein.

28. The Health Care Providers' negligence and deviation from the Standard of Care as described above, proximately caused injury to the Plaintiff, John C. Mangus, in that it denied him the right to decide whether to father a child, the anguish and emotional and mental suffering of fathering an unplanned child, the anguish and emotional and mental suffering involved in being the father of an unplanned child, the anguish and mental and emotional suffering in raising and caring for an unplanned child, the financial impact related to caring for and raising an unplanned child and was otherwise injured and damaged.

29. The Plaintiff further alleges that the injuries and damages herein complained of were proximately caused by the negligence and want of care of the Health Care Providers, without any negligence on the Plaintiff's part contributing thereto.

WHEREFORE, the Plaintiff, John C. Mangus, claims compensatory

damages against Defendants, Bridget D. Roots, M.D.; Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician Partners d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and Nicola London, M.D., in excess of Twenty-Five Thousand Dollars (\$25,000.00).

COUNT III

Lack of Informed Consent

(Patricia A. Mangus vs. All Defendants)

Patricia A. Mangus sues Bridget D. Roots, M.D.; Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician Partners d/b/a Drs. London & Roots and/or Dr. London and Associates and/or

Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and Nicola London, M.D., Defendants.

30. The Claimant incorporates by reference Paragraphs 1 through 21 of this Complaint, as if the same were set forth in full herein.

31. The Defendants owed a duty to Patricia A. Mangus to exercise due care in fully informing her all the risks, benefits and alternative procedures available to her to achieve her desired infertility, as well as the expected and intended results of the chosen procedure.

32. Said Defendants were negligent and breached their duty of care they owe to Patricia A. Mangus, including but not limited to the following:

a. failed to fully inform the Plaintiff as to the availability and appropriateness of a bilateral tubal ligation, or other available procedures or methods;

b. failed to fully inform the Plaintiff as to the chances of a successful infertility with a laparoscopy bilateral tubal electrocautery as compared to the prospects of a successful infertility with the performance of a bilateral tubal ligation procedure, or other procedures or methods;

c. failed to fully inform the Plaintiff as to the risks of the laparoscopy and bilateral tubal electrocautery, including the risk that this procedure could fail to make her infertile;

d. failed to fully inform the Plaintiff as to the risks, benefits, alternative methods or procedures, and the expected and intended results of the selected procedure; and

e. and otherwise failed to fully inform the Plaintiff and were otherwise negligent in their failing to fully inform the Plaintiff.

33. The Defendants' negligence as described above, proximately caused injury to the Plaintiff, Patricia A. Mangus in that it denied her the right to decide whether to bear a child, the anguish and emotional and mental suffering of carrying and giving birth to an unplanned child, the anguish and emotional and mental suffering of raising an unplanned child, the financial impact related to caring for and raising an unplanned child and was otherwise injured and damaged.

34. The Plaintiff further alleges that the injuries and damages herein complained of were proximately caused by the negligence and want of care of the Defendants, without any negligence on the Plaintiff's part contributing thereto.

WHEREFORE, the Plaintiff, Patricia A. Mangus, claims compensatory damages against Health Care Providers, Bridget D. Roots, M.D.; Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician Partners d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and Nicola London, M.D., in excess of Twenty-Five Thousand Dollars (\$25,000.00).

COUNT IV

(Informed Consent)

(John C. Mangus vs. All Defendants)

John C. Mangus sues Bridget D. Roots, M.D.; Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician Partners d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; and Nicola London, M.D., Defendants.

35. The Plaintiff incorporates by reference Paragraphs 1 through 21, 31, and 32 of this Complaint, as if the same were set forth in full herein.

36. The Defendants' negligence as described above, proximately caused injury to the Plaintiff, John C. Mangus, in that it denied him the right to decide whether to father a child, the anguish and emotional and mental suffering of fathering an unplanned child, the anguish and emotional and mental suffering involved in being the father of an unplanned child, the anguish and

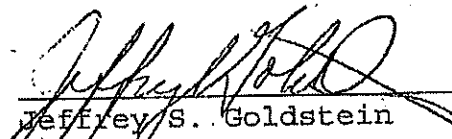
mental and emotional suffering in raising and caring for an unplanned child, the financial impact related to caring for and raising an unplanned child and was otherwise injured and damaged.

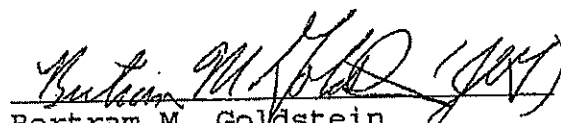
37. The Plaintiff further alleges that the injuries and damages herein complained of were proximately caused by the negligence and want of care of the Defendants, without any negligence on the Plaintiff's part contributing thereto.

WHEREFORE, the Plaintiff, John C. Mangus, claims compensatory damages against Defendants, Bridget D. Roots, M.D.; Helixcare Medical Group, LLC, d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Medstar Physician Partners and/or Nicola London, M.D.; Medstar Physician Partners d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Women's Care Ob/Gyn and/or Nicola London, M.D.; Drs. London & Roots d/b/a Women's Care Ob/Gyn and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London, M.D.; Dr. London and Associates d/b/a Women's Care Ob/Gyn and/or Drs. London & Roots and/or Medstar Physician Partners and/or Nicola London, M.D.; Women's Care Ob/Gyn d/b/a Drs. London & Roots and/or Dr. London and Associates and/or Medstar Physician Partners and/or Nicola London,

M.D.; and Nicola London, M.D., in excess of Twenty-Five Thousand Dollars (\$25,000.00).

Respectfully submitted,


Jeffrey S. Goldstein
JEFFREY S. GOLDSTEIN, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890


Bertram M. Goldstein
BERTRAM M. GOLDSTEIN &
ASSOCIATES, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890

Attorneys for Plaintiffs

Case: 03-C-05-002261
CF-Civil Fil
80.00
Appearance Fee 10.00
MLSC 25.00
TOTAL \$115.00

COMMENT:

Patricia a t John c. manaus vs Drice
a.d. and et al

Receipt #200500003684
Cashier: AFL CCRACUX060
02/28/05 10:08am

BEFORE THE HEALTH CLAIMS ARBITRATION OFFICE OF MARYLAND

PATRICIA A. MANGUS, et al. *

Claimants

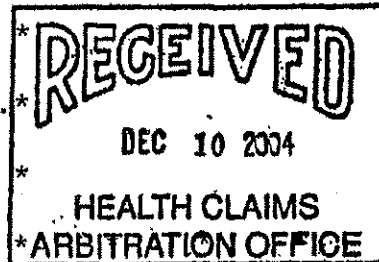
* HCA No.: 2004-0331

v.

BRIDGET D. ROOTS, M.D., et al. *

Health Care Providers

* * * * *



CLAIMANTS' CERTIFICATE OF QUALIFIED EXPERT

I HEREBY CERTIFY that I have reviewed the medical records and/or other documentation pertaining to the history, conditions, and injuries of Patricia A. Mangus (formerly Gudknecht), as such relate to the incidents involved herein.

I HEREBY CERTIFY that there were departures from and/or violations of the standards of medical care rendered to Patricia A. Mangus by Bridget D. Roots, M.D. Such departures and/or violations were the direct and proximate cause of injury and damage to Patricia Mangus, including her subsequent unintended pregnancy and the birth of her child.

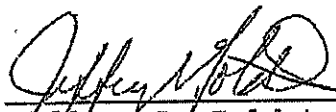
I am a licensed physician specializing in the field of obstetrics and gynecology. Less than twenty percent (20%) of my annual professional activities directly involve

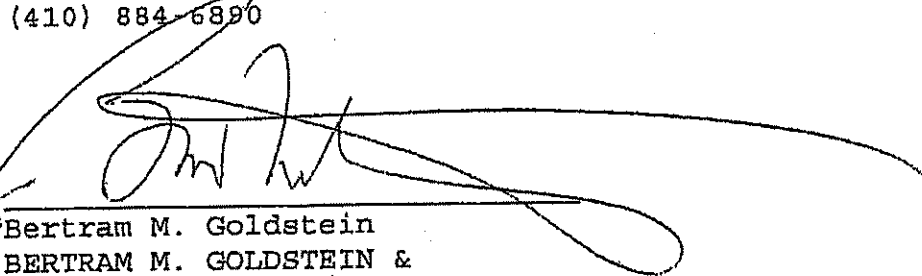
Exhibit A

testimony in either medical malpractice or personal injury claims. My report on Patricia A. Mangus is attached hereto.

12/10/04
Date

David M. Solomon, M.D.
David M. Solomon, M.D.


Jeffrey S. Goldstein
JEFFREY S. GOLDSTEIN, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890


Bertram M. Goldstein
BERTRAM M. GOLDSTEIN &
ASSOCIATES, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890

~~Attorneys for Claimants~~

CERTIFICATE OF SERVICE

I hereby certify that on this 70th day of December, 2004,
a copy of the foregoing Claimants' Certificate of Qualified
Expert was mailed, postage prepaid by first class mail, to
the following:

BRIDGET D. ROOTS, M.D.
11123 Parkview Plaza Drive
Fort Wayne, IN 46845

And

HELIXCARE MEDICAL GROUP, LLC
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND ASSOCIATES
and/or WOMEN'S CARE OB/GYN
and/or MEDSTAR PHYSICIAN PARTNERS
and/or NICOLA LONDON, M.D.
c/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

MEDSTAR PHYSICIAN PARTNERS
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or WOMEN'S
CARE OB/GYN and/or NICOLA
LONDON, M.D.
C/o Robert J. Ryan
~~5565 Sterrett Place~~
5th Floor
Columbia, MD 21044

And

DRS. LONDON & ROOTS
d/b/a WOMEN'S CARE OB/GYN
and/or DR. LONDON AND

ASSOCIATES and/or MEDSTAR
PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

DR. LONDON AND ASSOCIATES
d/b/a WOMEN'S CARE OB/GYN and/or
DRS. LONDON & ROOTS and/or
MEDSTAR PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

WOMEN'S CARE OB/GYN
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or MEDSTAR
PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

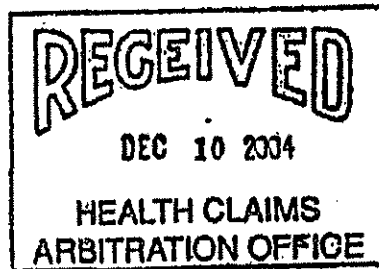
NICOLA LONDON, M.D.
1576 Merritt Blvd.
Baltimore, MD 21222


Jeffrey S. Goldstein

David M. Solomon, M.D.
11 Slade Avenue
Apt. 714
Baltimore, Maryland 21208
(410)484-5226

December 9, 2004

Jeffrey S. Goldstein, Esquire
Jeffrey S. Goldstein, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044



Re: Patricia A. Mangus

Dear Mr. Goldstein:

I have reviewed the medical records and other pertinent materials regarding Patricia Mangus. I have concluded that the care rendered by Bridget D. Roots, M.D., fell below and deviated from the accepted medical standards for health care providers of similar training and experience. Furthermore, it is my opinion that such Health Care Provider's actions or omissions did proximately cause injury and damage to Patricia Mangus, including her subsequent unintended pregnancy and the birth of her child.

Less than twenty (20%) percent of my annual professional activities directly involve testimony in either medical malpractice or personal injury claims.

Very truly yours,

David Solomon, M.D.
David Solomon, M.D.

BEFORE THE HEALTH CLAIMS ARBITRATION OFFICE OF MARYLAND
PATRICIA A. MANGUS, et al. *

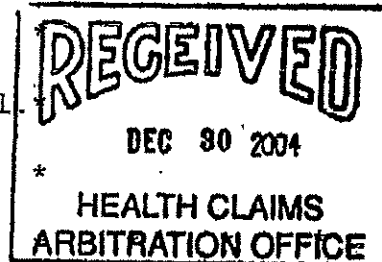
Claimants

* HCA No.: 2004-0331

v.

BRIDGET D. ROOTS, M.D., et al.

Health Care Providers



* * * * *

ELECTION TO WAIVE ARBITRATION

Claimants, by their undersigned attorneys, and pursuant to the Annotated Code of Maryland, Courts and Judicial Proceedings Article, § 3-2A-06B, hereby elect to waive arbitration of this claim and will proceed directly into the Circuit Court for Baltimore County, which has jurisdiction over the Claimants and the Health Care Providers.

Respectfully submitted,


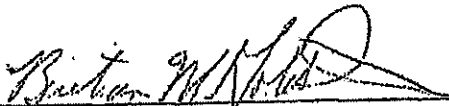
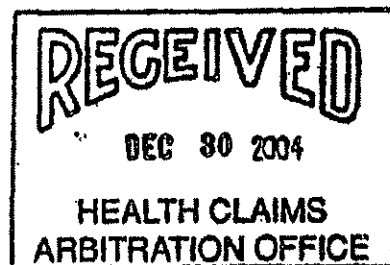

Jeffrey S. Goldstein
JEFFREY S. GOLDSTEIN, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890

Exhibit B


Bertram M. Goldstein
BERTRAM M. GOLDSTEIN &
ASSOCIATES, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890

Attorneys for Claimants



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of December, 2004, a copy of the foregoing Election to Waive Arbitration was mailed, postage prepaid by first-class mail, to the following:

BRIDGET D. ROOTS, M.D.
11123 Parkview Plaza Drive
Fort Wayne, IN 46845

And

HELIXCARE MEDICAL GROUP, LLC
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND ASSOCIATES.
and/or WOMEN'S CARE OB/GYN
and/or MEDSTAR PHYSICIAN PARTNERS
and/or NICOLA LONDON, M.D.
c/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

MEDSTAR PHYSICIAN PARTNERS
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or WOMEN'S
CARE OB/GYN and/or NICOLA
LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

DRS. LONDON & ROOTS
d/b/a WOMEN'S CARE OB/GYN
and/or DR. LONDON AND
ASSOCIATES and/or MEDSTAR

PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

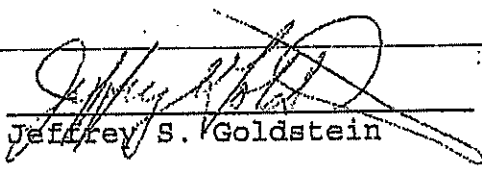
DR. LONDON AND ASSOCIATES
d/b/a WOMEN'S CARE OB/GYN and/or
DRS. LONDON & ROOTS and/or
MEDSTAR PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

WOMEN'S CARE OB/GYN
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or MEDSTAR
PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

NICOLA LONDON, M.D.
1576 Merritt Blvd.
Baltimore, MD 21222


Jeffrey S. Goldstein

BEFORE THE HEALTH CLAIMS ARBITRATION OFFICE OF MARYLAND

PATRICIA A. MANGUS, et al. *

Claimants

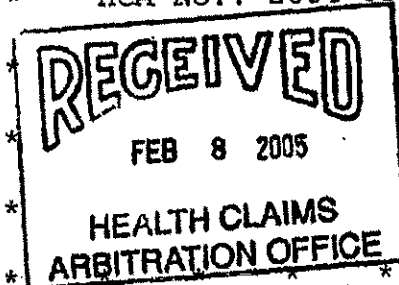
HCA No.: 2004-0331

v.

BRIDGET D. ROOTS, M.D., et al.*

Health Care Providers *

* * * * *



CLAIMANTS' SUPPLEMENTAL CERTIFICATE OF QUALIFIED EXPERT

I HEREBY SUBMIT the following Supplemental
Certification:

I HEREBY CERTIFY that I have reviewed the medical records and/or other documentation pertaining to the history, conditions, and injuries of Patricia A. Mangus (formerly Gudknecht), as such relate to the incidents involved herein.

I HEREBY CERTIFY that there were departures from and/or violations of the standards of medical care rendered to Patricia A. Mangus by Bridget D. Roots, M.D.; and also by Helixcare Medical Group, LLC, Drs. London & Roots, Dr. London and Associates, Women's Care Ob/Gyn, Medstar Physician Partners, and Nicola London, M.D., who I understand were responsible for the actions of Bridget Roots, M.D. Such departures and/or violations were the

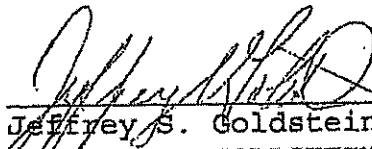
Exhibit C


direct and proximate cause of injury and damage to Patricia Mangus, including her subsequent unintended pregnancy and the birth of her child.

I am a licensed physician specializing in the field of obstetrics and gynecology. Less than twenty percent (20%) of my annual professional activities directly involve testimony in either medical malpractice or personal injury claims. I have previously submitted my report on Patricia A. Mangus.

02/08/05
Date

David Solomon, M.D.
David M. Solomon, M.D.


Jeffrey S. Goldstein
JEFFREY S. GOLDSTEIN, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890


Bertram M. Goldstein
BERTRAM M. GOLDSTEIN & ASSOCIATES, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890

Attorneys for Claimants

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of February, 2005,
a copy of the foregoing Claimants' Supplemental Certificate
of Qualified Expert was mailed, postage prepaid by first
class mail, to the following:

BRIDGET D. ROOTS, M.D.
11123 Parkview Plaza Drive
Fort Wayne, IN 46845

HELIXCARE MEDICAL GROUP, LLC
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND ASSOCIATES
and/or WOMEN'S CARE OB/GYN
and/or MEDSTAR PHYSICIAN PARTNERS
and/or NICOLA LONDON, M.D.
c/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

MEDSTAR PHYSICIAN PARTNERS
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or WOMEN'S
CARE OB/GYN and/or NICOLA
LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

DRS. LONDON & ROOTS
d/b/a WOMEN'S CARE OB/GYN
and/or DR. LONDON AND
ASSOCIATES and/or MEDSTAR
PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.

C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

DR. LONDON AND ASSOCIATES
d/b/a WOMEN'S CARE OB/GYN and/or
DRS. LONDON & ROOTS and/or
MEDSTAR PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

WOMEN'S CARE OB/GYN
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or MEDSTAR
PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
C/o Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

NICOLA LONDON, M.D.
1576 Merritt Blvd.
Baltimore, MD 21222


Jeffrey S. Goldstein

PATRICIA A. MANGUS
12322 Eastern Avenue
Apt. A
Baltimore, MD 21220

And

JOHN C. MANGUS
12322 Eastern Avenue
Apt. A
Baltimore, MD 21220

Plaintiffs

v.

BRIDGET D. ROOTS, M.D.
1556 Laurel Drive
Mountain Top, PA 18707

And

HELIXCARE MEDICAL GROUP, LLC
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND ASSOCIATES
and/or WOMEN'S CARE OB/GYN
and/or MEDSTAR PHYSICIAN PARTNERS
and/or NICOLA LONDON, M.D.
9600 Pulaski Park Drive, Suite 103
Baltimore, MD 21220

Serve On:

Resident Agent,
Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

MEDSTAR PHYSICIAN PARTNERS
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or WOMEN'S
CARE OB/GYN and/or NICOLA
LONDON, M.D.

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

*

IN THE

CIRCUIT COURT

FOR

BALTIMORE COUNTY

Civil No. 03.C.05.226

9600 Pulaski Park Drive, Suite 103
Baltimore, MD 21220

Serve on:

Resident Agent,
Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

DRS. LONDON & ROOTS
d/b/a WOMEN'S CARE OB/GYN
and/or DR. LONDON AND
ASSOCIATES and/or MEDSTAR
PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
1576 Merritt Blvd.
Baltimore, MD 21222

Serve on:

Resident Agent,
Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

DR. LONDON AND ASSOCIATES
d/b/a WOMEN'S CARE OB/GYN and/or
DRS. LONDON & ROOTS and/or
MEDSTAR PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
1576 Merritt Blvd.
Baltimore, MD 21222

Serve on:

Resident Agent,
Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

WOMEN'S CARE OB/GYN
d/b/a DRS. LONDON & ROOTS
and/or DR. LONDON AND
ASSOCIATES and/or MEDSTAR
PHYSICIAN PARTNERS and/or
NICOLA LONDON, M.D.
1576 Merritt Blvd.
Baltimore, MD 21222

Serve on:
Resident Agent,
Robert J. Ryan
5565 Sterrett Place
5th Floor
Columbia, MD 21044

And

NICOLA LONDON, M.D.
1576 Merritt Blvd.
Baltimore, MD 21222

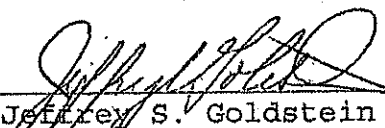
Defendants

* * * * *

ELECTION FOR JURY TRIAL

The Plaintiffs elect to have this case tried before a jury.

Respectfully submitted,



JEFFREY S. GOLDSTEIN, P.A.
10320 Little Patuxent Parkway
Suite 322
Columbia, Maryland 21044
(410) 884-6890



Bertram M. Goldstein

BERTRAM M. GOLDSTEIN &

ASSOCIATES, P.A.

10320 Little Patuxent Parkway

Suite 322

Columbia, Maryland 21044

(410) 884-6890

Attorneys for Plaintiffs