

HEALTH CARE ALTERNATIVE DISPUTE RESOLUTION OFFICE

6 St. Paul Street, Suite 1501
Baltimore, Maryland 21202-1608
(410) 767-8200

2019 620

CLAIM FORM

HCA NO.: _____

CLAIMANT(S)

HEALTH CARE PROVIDER(S)

Brady Triplett
Name
4 Furnace Court
Street Address
Thurmont, Maryland 21788
City, State, Zip Code

Frederick Memorial Hospital
Name
400 W 7th Street
Street Address
Frederick, Maryland 21701
City, State, Zip Code

Name

Street Address

City, State, Zip Code

Stuart Goodman, M.D.
Name
400 W 7th Street
Street Address
Frederick, Maryland 21701
City, State, Zip Code

Name

Street Address

City, State, Zip Code

Name

Street Address

City, State, Zip Code

(1) This claim is filed pursuant to Title 3, Subtitle 2A of the Courts Article. The damages claimed are in excess of \$30,000.00, and the appropriate venue is: Frederick County.

(2) The basis of the claim is described on the page(s) attached hereto.

(3) The resolution of the claim will involve particular expertise in this area of specialty 008, 019.
(PLEASE SEE REVERSE SIDE FOR AREAS OF CONCENTRATION)

WARNING: Each Claimant has been advised that he/she may be held civilly liable for part or all the Costs resulting from the filing of this claim, whether it is won or lost; this would be an individual and personal responsibility.

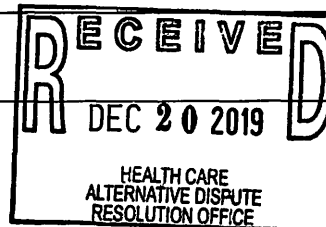
ATTORNEY FOR CLAIMANT(S)

CLAIMANT(S)

Jason B. Pennington
Signature
1301 York Road, Suite 600
Street Address

Paul K. [Signature]
Signature for each Claimant

Lutherville, Maryland 21093
City, State, Zip Code
(410) 769-5400
Telephone Number



2. Damages sustained by Claimant exceed the required jurisdictional amount under MD. CODE, CTS. & JUD. PROC. § 3-2A-02.

3. Venue as to all claims is invoked in Frederick County pursuant to MD. CODE ANN., CTS. & JUD. PROC. § 6-201, *et seq.*, inasmuch as: (a) all Health Care Providers reside, carry on a regular business, are employed and/or habitually engage in a vocation in Frederick; and/or (b) the cause of action arose in Frederick County, in that the injuries proximately caused by the alleged negligence of the Health Care Providers occurred in Montgomery County.

THE PARTIES

4. Claimant Brady Triplett is a young, 26 year old male who resides at 4 Furnace Court, Thurmont, Maryland 21788. At all times relevant, Claimant was a patient of the Health Care Providers.

5. At all times pertinent hereto, Health Care Provider Frederick Memorial Hospital, a professional services corporation organized under the laws of the State of Maryland, with its principal place of business in Frederick County, Maryland, held itself out to the public as competent to provide medical, surgical and nursing services, and indeed did provide such care and services to Brady Triplett, directly and by and through its principals, and/or actual and/or apparent agents, servants and/or employees, including but not limited to Stuart Goodman, M.D. and Eric Hansen, M.D., who at all times acted within the scope of their authority in providing care to Claimant.

6. At all times pertinent hereto, Health Care Provider Stuart Goodman, M.D., (hereinafter, "Dr. Goodman"), was licensed to practice medicine in the state of Maryland, and held himself out to the public as a competent practitioner of neurology. At all times

relevant in rendering care to Claimant, Dr. Goodman was employed in, and habitually carried on a vocation in Frederick, Maryland.

7. At all times pertinent hereto, Dr. Goodman acted individually, and as the actual and/or apparent agent, servant and/or employee of Frederick Memorial Hospital, and did so within the scope of his employment and authority.

8. At all times relevant hereto, each of the Health Care Providers, including their principals, and/or actual and/or apparent agents, servants and/or employees acted as the actual and/or apparent agents, servants and/or employees of each other.

9. At all times pertinent hereto, Claimant was a patient of the above Health Care Providers (hereinafter referred to collectively as: The Health Care Providers) for the purpose of receiving health care and treatment.

DUTIES OF THE HEALTH CARE PROVIDERS

10. At all times during Claimant's hospitalization, Frederick Memorial Hospital operated a two hundred thirty three (233) bed hospital within the meaning of COMAR 10.09.92 offering diagnostic and treatment services for 2 or more unrelated individuals, under the supervision of medical staff at 400 W 7th Street, Frederick, Maryland 21701, which Frederick Memorial Hospital, was licensed by the State of Maryland to operate.

11. As a condition of licensure, Frederick Memorial Hospital, and its managerial employees and agents had the duty, at all times material to this Statement of Claim, to operate the hospital in compliance with the regulations governing licensed hospitals in effect during Claimant's hospitalization.

12. At all times material to this Statement of Claim, Frederick Memorial Hospital, operated a hospital participating in the Medicare program and as a hospital participating in the Medicaid program.

13. At all times material to this Statement of Claim, as a condition of participation in the Medicare and Medicaid programs, Frederick Memorial Hospital, and its managerial employees and agents had the duty, and state regulations required them, to operate the hospital, in compliance with the regulations governing hospitals participating in the Medicare program and hospitals participating in the Medicaid program, codified at 42 USC Ch. 4, Part 482.

14. At all times material to this Statement of Claim, Frederick Memorial Hospital was a “hospital” as defined by MD Health-Gen. § 19-301 (2018) and a “health care provider” as defined in MD Cts. & Jud. Pro. § 3-2A-01 (2018). As a hospital and health care provider, Frederick Memorial Hospital owed Claimant, while he was a patient at Frederick Memorial Hospital, the duty, when providing him with health care to:

- a. Use reasonable care and diligence in the application of their knowledge and skill to his care;
- b. Use their best judgment in his treatment and care;
- c. Provide him with treatment and care in accordance with the standards of practice among members of the medical and nursing profession and other medical support professions with similar training and experience;
- d. Employ medical record-keeping practices which were in keeping with the standards of practice among hospitals; and

- e. Otherwise failed to meet all of its non-delegable fiduciary duties to Claimant including but not limited to the duties set forth in the ensuing paragraphs of this Statement of Claim.

Frederick Memorial Hospital was at all relevant times, legally responsible for the actions of its managerial employees and agents, apparent agents, and/or those employees it supervised, while acting within the course and scope of their employment and/or agency.

15. Frederick Memorial Hospital, and its managerial employees, agents and apparent agents, including but not limited to Stuart Goodman, M.D. and Eric Hansen, M.D., owed certain non-delegable, fiduciary duties to Claimant, including the administrative duties to exercise reasonable care to:

- a. Monitor and oversee the treatment which is prescribed and administered by nurses and other health care professionals practicing at the facility;
- b. Monitor and oversee the qualifications, competency, and compliance with their policies and the applicable standards of care of the physicians, nurses and technicians and other health care professionals practicing at the facility;
- c. Monitor and oversee the selection and retention of nurses and other health care professionals practicing at the facility;
- d. Monitor and oversee the compliance of all employees, agent and apparent agents with safety standards the facility health care provider voluntarily agreed to abide by, including 42 USC Ch. 4, Part 482, MD Health-Gen. § 19-301 (2018), and COMAR 10.09.92;

- e. Adopt and implement policies which did not interfere with the best judgment of physicians, nurses or other health care professionals practicing at the facility; and
- f. Adopt and implement policies which did not require physicians, nurses, or other health care professionals practicing at the facility to exceed their scope of practice or their duties to patients.

The health care providers also had non-delegable fiduciary duties to Claimant including but not limited to the duties set forth in the ensuing paragraphs of this Complaint.

16. Frederick Memorial Hospital, Inc. and its managerial employees, agents and apparent agents, including but not limited to Stuart Goodman, M.D. and Eric Hansen, M.D., had the non-delegable fiduciary duty to Claimant to exercise direct management control of the facility on a full-time basis, to develop and implement policies for the management and operation of the facility, to train employees concerning those policies and their job duties, and specifically to ensure that the following duties owed to Claimant were met by its employees:

- a. That patient services were provided in accordance with all applicable local, state and federal regulations and codes, and
- b. That patient services were provided in accordance with acceptable standards of practice applicable to professionals providing patients services in the facility, and specifically that services provided or arranged by the health care providers for Claimant met professional standards of quality and were provided by qualified persons.

- c. That facility staff (both professional and non-professional including employees, agents, apparent agents, and/or independent contractors) were properly hired in sufficient numbers, screened, trained, and supervised; and that all staff was competent and fit to provide custodial and nursing care for the health, safety, and proper care of hospital patients;
- d. That a comprehensive assessment of the patient's needs was promptly conducted and conducted again after a significant change in his physical or mental condition, which assessment was used to develop, review, and revise his comprehensive plan of care;
- e. That Claimant received, and that the health care providers provided, the necessary care and services to attain or maintain the patient's highest practicable physical, mental and psychosocial well-being.

17. Frederick Memorial Hospital held itself out to the Maryland Department of Health and/or the public at large and/or Claimant and Claimant's family specifically, as being:

- a. Skilled in the performance of nursing, surgical, rehabilitative and other medical support services;
- b. Properly staffed, supervised and equipped to meet the total needs of its patients; able to specifically meet the nursing, medical, pharmacological, and monitoring of Brady Triplett and other patients like Brady Triplett; and
- c. Licensed by the Maryland Department of Health as complying on a continual basis with all rules, regulations and standards established for hospitals in Maryland.

18. Frederick Memorial Hospital, held itself out to the Centers for Medicare Services and/or to the public at large and/or to Claimant and Claimant's family specifically, as being a hospital that meets the requirements of 42 USC Ch. 4, Part 482, MD Health-Gen. § 19-301 (2018), and COMAR 10.09.92 and other federal and state statutes and regulations.

19. An appropriate Certificate of Merit and Report signed by an expert in the health care providers' medical specialties in support of Claimant's claims will be filed.

20. At all times relevant hereto Health Care Providers agreed to provide to Claimant appropriate care and treatment. Accordingly, Health Care Providers owed a duty to Claimant to exercise the degree of skill and care expected of reasonably competent health care providers in the monitoring, evaluation, assessment, and treatment in the same or similar circumstances.

FACTS COMMON TO ALL COUNTS

21. This claim arises from corporate and medical negligence committed by Frederick Memorial Hospital. That negligence resulted in Brady Triplett suffering a devastating stroke resulting in permanent brain damage, to include the loss of motor control.

22. Brady Triplett was transported by the Frederick County Division of Fire and Rescue to Frederick Memorial Hospital on December 26, 2016.

23. EMS providers noted their impression of Claimants' symptoms as "Stroke/CVA." Mr. Triplett arrived, via ambulance, at Frederick Memorial Hospital at 8:35 p.m.

24. Upon arrival at Frederick Memorial Hospital it is noted that while at home:

"...he was getting up from the couch and lost his balance and fell to the floor, hitting his head on the wooden table... He

says he was unable to get up from the ground so the ambulance was called to bring him to the hospital.”

25. The triage assessment performed at the hospital noted the following:

Per ems- pt. watching tv at 1900, attempted to stand and fell to floor and began to shake but remained alert. Per ems pt has left facial droop and left arm and leg paralysis. Pt. alert and oriented with slightly slurred speech.

26. On December 26, 2016 at or around 20:27, Anna M. Houck assessed Mr. Triplett’s pain score as being “0”.

27. On December 26, 2016 at or around 21:16, health care provider “SAR” noted that Mr. Triplett was having: “abnormal thought processes, speech abnormal, motor response/posturing, abnormal reflexes/signs” and that the patient “states that he is unable to move left arm, left leg and is having difficulty ambulating. Dorsiplantar flexion equal. Pt. states that he is unable to grip with his left hand. Pt states that he began having a severe headache around 2000 and then lost ability to move his extremities on his left side. Denies any ETOH or Drug use this evening.”

28. In the emergency department, he was seen by physician Eric Scott Hansen.

29. He was sent for an urgent CT after a routine physical exam and neurology was contacted to discuss possible tPA usage.

30. It was noted that Mr. Triplett reported numbness in his left upper extremity and left lower extremity “subjective, weakness.” He denied headache, tingling, tremors.

31. Later, it was noted “patient will not move “[Left Upper Extremity] and [Left Lower Extremity] to command. It is documented that “with painful stimuli, patient will move LUE and LLE, but will not painful stimuli at times when asked –inconsistent exam.”

32. Later, at 20:58, Mr. Triplett was reexamined. The health care providers noted “patient updated on negative CT findings. Re-examined LUE and LLE w/ painful stimuli. Patient retracts limbs minimally w/ painful stimuli.”

33. Upon further examination, however, it was noted that Mr. Triplett was “able to answer...all the questions appropriately. He says he is unable to move his left upper and lower extremities. He says his symptoms have gotten worse since he came in.

34. A test of his central nervous system revealed that he has 0/5 in his left upper extremity and 0/5 in his left lower extremity.

35. On December 26, 2016, Dr. Goodman and Dr. Hansen consulted in regards to Claimant and decided that “since patient was of inconsistent neuro exam and moving extremities with painful stimuli, he is not a tPA candidate.”

36. On December 27, 2016, Dr. Goodman completed a neurological examination of the Claimant. Dr. Goodman suggested that Claimant was “suffering from a right hemispheric ischemic cerebral infarction” rather than a “thrombotic episode.” Further plans and management options were suggested and provided.

37. Following Claimant’s neurological consult with Dr. Goodman, Claimant underwent a cardiology consult and psychiatry consult.

38. On December 27, 2016, Dr. Eduardo Espiridion, a psychiatrist, was consulted. The reason for the exam was noted to be “conversion reaction¹ suspected.” Brady Triplett was not experiencing a conversion reaction.

39. On December 27, 2016 at 12:15 a brain MRI was performed. The impression was:

¹ Conversion reaction is a mental condition in which a person has blindness, paralysis or other neurologic symptoms that cannot be explained by medical evaluation.

Large region of diffusion restriction consistent with non-hemorrhagic stroke for the right basal ganglia, right insular and right inferior temporal lobe cortex. Findings are in the vascular distribution of the right posterior cerebellar artery. No flow abnormalities are noted within the basilar artery nor within the visualized proximal right or left posterior cerebellar arteries. Consider MRA if clinically warranted.

40. An MRA was clinically warranted and, at or around December 27, 2016 at 15:26, it was noted that:

Almost complete occlusion of the right MCA, with barely perceptible threadlike perfusion of the proximal most aspect of the MCA. This corresponds to the right MCA territory infarct identified on the 12/26/2016 MRI of the brain study.

41. The MRI and MRA of Brady Triplet's brain confirmed that he was not suffering from a "conversion reaction" rather he suffered an ischemic stroke—a condition that should have been diagnosed and treated in a timely fashion by Health Care Providers.

42. As a result of the Health Care Provider's failures, Brady Triplett was not provided with IV Anti-Thrombotic (t-PA) medication.

COUNT I
(ORDINARY CORPORATE NEGLIGENCE – FREDERICK MEMORIAL HOSPITAL)

43. Claimant repeats, re-alleges, adopts, and incorporates by reference the above paragraphs of this Statement of Claim as if fully set forth herein.

44. Health Care Provider Frederick Memorial Hospital breached its administrative duties to Brady Triplett by:

a. Failing to exercise ordinary care in monitoring and overseeing the treatment which was prescribed for and administered to the patient by physicians, nurses and other healthcare professionals practicing at the facility;

b. Failing to exercise ordinary care in monitoring and overseeing the

qualifications competency, and compliance with its policies and the applicable standards of care of the physicians, nurses, and other healthcare professionals practicing at and rendering care to the patient at the hospital;

c. Failing to exercise ordinary care in monitoring and overseeing the selection and retention of physicians, nurses and other health care professionals practicing at the facility;

d. Failing to exercise ordinary care in monitoring and overseeing the compliance of all their agents with the safety standards that it voluntarily agreed to abide by, including but not limited to 42 USC Ch. 4, Part 482, MD Health-Gen. § 19-301 (2018), and COMAR 10.09.92;

e. Failing to exercise ordinary care by adopting and implementing policies which interfered with the best judgment of physicians, nurses and other health care professionals practicing at the facility and rendering care to the resident;

f. Adopting and implementing policies which had the effect of requiring physicians, nurses, and other healthcare professionals practicing at the facility to exceed their scope of practice and/or their duties to patients; and

g. Other acts and omissions, which will be shown at the trial of this matter.

45. As a direct and proximate result of the Health Care Providers' negligence, including Dr. Goodman, and multiple violations of the applicable standards of care, Brady Triplett suffered and will suffer the following injuries, among others:

a. Neurological disabilities;

b. Physical impairment;

- c. Significant conscious pain and suffering;
- d. Emotional distress;
- e. He is and will be permanently dependent upon others for his care;
- f. He has and will continue to undergo serious and painful medical procedures;
- g. He has in the past and will in the future incur significant medical and other expenses;
- h. His earning capacity has been severely diminished; and
- i. Other injuries and damages.

46. But for the Health Care Providers' negligence, neglect, and multiple violations of the applicable standards of care, Brady Triplett would not have suffered the injuries, damages, and consequences as described above culminating in his untimely and otherwise preventable injury.

WHEREFORE, Claimant brings this action against the Defendant Health Care Providers and seeks damages that will adequately and fairly compensate him, plus costs and such other and further relief as may be deemed appropriate.

COUNT II
(NEGLIGENCE—MEDICAL MALPRACTICE —FREDERICK MEMORIAL HOSPITAL)

47. Claimant repeats, re-alleges, adopts, and incorporates by reference the above paragraphs of this Statement of Claim as if fully set forth herein.

48. In its care and treatment of Brady Triplett, the Defendant Health Care Provider owed Brady Triplett a duty to exercise that degree of care and skill that a

reasonably competent hospital and/or similar healthcare provider would have exercised under similar circumstances.

49. The Defendant Health Care Provider Frederick Memorial Hospital directly and through its actual and/or apparent agents, servants and/or employees, including but not limited to, Dr. Goodman who at all relevant times were acting within the scope of their authority and/or employment, failed to act as reasonably competent health care providers would have acted under the same or similar circumstances, breached the aforesaid duty of care to Brady Triplett and was negligent in the following respects, amongst others:

- a. Failing to utilize the proper medical techniques during the care and treatment of Brady Triplett;
- b. Failing to recognize and appropriately react to his stroke;
- c. Failing to use the appropriate medications to treat his stroke;
- d. Failing to properly train and supervise the health care providers in caring for patients suffering from a stroke;
- e. Failing to have and follow safe practices and maneuvers to treat patients with a stroke;
- f. Failing to establish and/or follow appropriate policies, procedures, protocols, and practices to address properly the needs of patients such as Brady Triplett;
- g. Failing to properly supervise and provide adequate training to its agents, servants, and/or employees;
- h. Failing to initiate new policies and update existing policies consistent with advances in medical knowledge and practice;

- i. Failing to train and educate medical and nursing staff on the significance and risks of a stroke;
- j. Failing to communicate adequately among Health Care Providers;
and
- k. Other negligent acts or omissions that may become apparent throughout the course of discovery.

50. The Defendant Health Care Provider breached the aforesaid duty of care to Brady Triplett and was negligent in the following respects, amongst others:

- a. Failing to adequately instruct, train, and/or supervise its agents, servants and employees;
- b. Failing to provide appropriately trained and skilled personnel to care for Brady Triplett;
- c. Failing to establish and/or follow and/or enforce appropriate policies, procedures and/or protocols for management of a stroke;
- d. Failing to establish and/or follow and/or enforce appropriate policies, procedures and practices to properly manage patients such Brady Triplett;
- e. Failing to properly credential, supervise and/or provide adequate training to agents, servants and/or employees, including those who cared for Brady Triplett; and
- f. Failing to have the appropriate staff, personnel and facilities to provide timely diagnosis and treatment of a surgical emergency.

51. As a direct and proximate result of the Health Care Providers' negligence, including Dr. Goodman, and multiple violations of the applicable standards of care Brady Triplett suffered and will suffer the following injuries, among others:

- a. Neurological disabilities;
- b. Physical impairment;
- c. Significant conscious pain and suffering;
- e. Emotional distress;
- f. He is and will be permanently dependent upon others for her care;
- g. He has and will continue to undergo serious and painful medical procedures;
- i. His earning capacity has been severely diminished; and
- j. Other injuries and damages.

52. But for the Health Care Providers' negligence, neglect, and multiple violations of the applicable standards of care, Brady Triplett would not have suffered the injuries, damages, and consequences as described above culminating in his untimely and otherwise preventable injury.

WHEREFORE, Claimant brings this action against the Defendant Health Care Providers and seeks damages that will adequately and fairly compensate her, plus costs and such other and further relief as may be deemed appropriate. .

COUNT III
(NEGLIGENCE—MEDICAL MALPRACTICE —STUART GOODMAN, MD)

53. Claimant repeats, re-alleges, adopts, and incorporates by reference the above paragraphs of this Statement of Claim as if fully set forth herein.

54. In his care and treatment of Brady Triplett, the Defendant Health Care Provider owed Brady Triplett a duty to exercise that degree of care and skill that a reasonably competent physician and/or similar healthcare provider would have exercised under similar circumstances.

55. The Defendant Health Care Provider Stuart Goodman, M.D. breached the aforesaid duty of care to Brady Triplett and was negligent in the following respects, amongst others:

- a. Failing to utilize the proper medical techniques during the care and treatment of Brady Triplett;
- b. Failing to recognize and appropriately react to his stroke;
- c. Failing to use the appropriate medications to treat his stroke;
- d. Failing to properly train and supervise the health care providers in caring for patients suffering from a stroke;
- e. Failing to have and follow safe practices and maneuvers to treat patients with a stroke;
- f. Failing to establish and/or follow appropriate policies, procedures, protocols, and practices to address properly the needs of patients such as Brady Triplett;
- g. Failing to properly supervise and provide adequate training to its agents, servants, and/or employees;
- h. Failing to initiate new policies and update existing policies consistent with advances in medical knowledge and practice;

- i. Failing to train and educate medical and nursing staff on the significance and risks of a stroke;
- j. Failing to communicate adequately among Health Care Providers;
and
- k. Other negligent acts or omissions that may become apparent throughout the course of discovery.

56. As a direct and proximate result of the Health Care Providers' negligence, including Dr. Goodman, and multiple violations of the applicable standards of care, Brady Triplett suffered and will suffer the following injuries, among others:

- a. Neurological disabilities;
- b. Physical impairment;
- c. Significant conscious pain and suffering;
- d. Emotional distress;
- e. He is and will be permanently dependent upon others for his care;
- f. He has and will continue to undergo serious and painful medical procedures;
- g. He has in the past and will in the future incur significant medical and other expenses;
- h. His earning capacity has been severely diminished; and
- i. Other injuries and damages.

57. But for the Health Care Providers' negligence and multiple violations of the applicable standards of care, Brady Triplett would not have suffered the injuries, damages,

and consequences as described above culminating in her untimely and otherwise preventable death.

WHEREFORE, Claimant brings this action against the Defendant Health Care Providers and seeks damages that will adequately and fairly compensate her, plus costs and such other and further relief as may be deemed appropriate.

COUNT III
(NEGLIGENCE—MEDICAL MALPRACTICE —ERIC SCOTT HANSEN, MD)

58. Claimant repeats, re-alleges, adopts, and incorporates by reference the above paragraphs of this Statement of Claim as if fully set forth herein.

59. In his care and treatment of Brady Triplett, the Defendant Health Care Provider owed Brady Triplett a duty to exercise that degree of care and skill that a reasonably competent physician and/or similar healthcare provider would have exercised under similar circumstances.

60. The Defendant Health Care Provider Eric Scott Hansen, M.D. breached the aforesaid duty of care to Brady Triplett and was negligent in the following respects, amongst others:

- a. Failing to utilize the proper medical techniques during the care and treatment of Brady Triplett;
- b. Failing to recognize and appropriately react to his stroke;
- c. Failing to use the appropriate medications to treat his stroke;
- d. Failing to properly train and supervise the health care providers in caring for patients suffering from a stroke;
- e. Failing to have and follow safe practices and maneuvers to treat patients with a stroke;

- f. Failing to establish and/or follow appropriate policies, procedures, protocols, and practices to address properly the needs of patients such as Brady Triplett;
- g. Failing to properly supervise and provide adequate training to its agents, servants, and/or employees;
- h. Failing to initiate new policies and update existing policies consistent with advances in medical knowledge and practice;
- i. Failing to train and educate medical and nursing staff on the significance and risks of a stroke;
- j. Failing to communicate adequately among Health Care Providers;
and
- k. Other negligent acts or omissions that may become apparent throughout the course of discovery.

61. As a direct and proximate result of the Health Care Providers' negligence, including Dr. Hansen, and multiple violations of the applicable standards of care, Brady Triplett suffered and will suffer the following injuries, among others:

- a. Neurological disabilities;
- b. Physical impairment;
- c. Significant conscious pain and suffering;
- d. Emotional distress;
- e. He is and will be permanently dependent upon others for his care;
- f. He has and will continue to undergo serious and painful medical procedures;

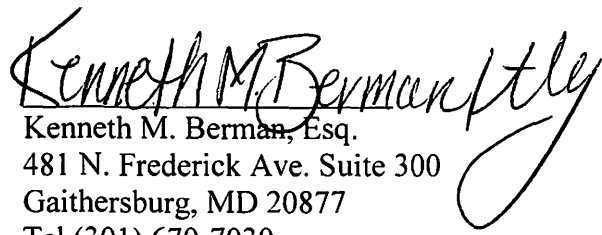
- g. He has in the past and will in the future incur significant medical and other expenses;
- h. His earning capacity has been severely diminished; and
- i. Other injuries and damages.

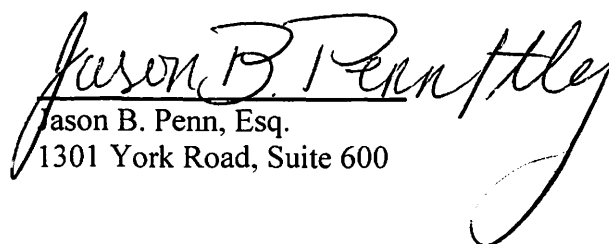
62. But for the Health Care Providers' negligence and multiple violations of the applicable standards of care, Brady Triplett would not have suffered the injuries, damages, and consequences as described above culminating in her untimely and otherwise preventable death.

WHEREFORE, Claimant brings this action against the Defendant Health Care Providers and seeks damages that will adequately and fairly compensate her, plus costs and such other and further relief as may be deemed appropriate.

Respectfully submitted,

**BERMAN, SOBIN, GROSS,
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