



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

CHRISTY T. O'CONNELL, *

Plaintiff *

v. *

Case No: 14-cv-1339

ASSOCIATES IN OB/GYN CARE, LLC, et al. *

Defendants *

* * * * *

MOTION TO CONSOLIDATE WITH CASE NO. 15-CV-3820

Plaintiff, Christy T. O'Connell, by and through her attorneys, Emily C. Malarkey and Salsbury, Clements, Bekman, Marder & Adkins L.L.C., hereby moves to consolidate the above-captioned case with Case No. 15-cv-3820, and for reasons states as follows.

1. In this wrongful birth case, which was initiated with the filing of a Complaint in April of 2014, the Plaintiff Christy O'Connell alleged that the Defendants, Iris Dominy, M.D. and a Frederick, Maryland abortion clinic known as Associates in OB/GYN Care, were negligent in their care and treatment of her, leading to the wrongful birth of Ms. O'Connell's son in 2012. Specifically, Plaintiff alleges that Dr. Dominy and an unknown individual who interpreted an obstetric sonogram were negligent in interpreting that sonogram to show that Ms. O'Connell's medical abortion was successful, when in fact she was still pregnant.

2. In 2015, Plaintiff initiated a second lawsuit against Stephen Brigham, M.D. and Vikram Kaji, M.D., which was docketed as No. 15-cv-2418. That Complaint alleged that Dr. Brigham and Dr. Kaji, the owner and an employee the abortion clinic, respectively, were negligent in instituting a policy whereby untrained "office managers" were permitted to

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
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