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Joseph M. Gorrell
Direct Dial: 973-403-3112
Direct Fax: 973-618-5512
E-mail: jgorrell@bracheichler.com

September 23, 2010

CERTIFIED MAIL RETURN RECEIPT REQUESTED
VIA FACSIMILE (609) 826-7117

William V. Roeder
Executive Director
New Jersey State Board of Medical Examiners
P.O. Box 183
140 East Front Street, 2nd Floor
Trenton, New Jersey 08625-0183

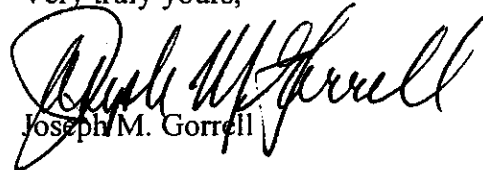
Re: I/M/O Steven C. Brigham, M.D.
Our File No.: AME444-260333

Dear Mr. Roeder:

This office represents Respondent, Steven C. Brigham, M.D. in the above stated matter. Enclosed for filing are an original and one copy of the Answer to the Amended Verified Complaint. Please return one copy stamped "Filed" to our office in the enclosed, self addressed stamped envelope.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me.

Very truly yours,


Joseph M. Gorrell

JMG/bjm
Enclosures

cc: Jeri L. Warhaftig, D.A.G. (w/encl.)
Steven C. Brigham, M.D. (w/encl.)

BRACH EICHLER L.L.C.
101 Eisenhower Parkway
Roseland, New Jersey 07068-1067
(973) 228-5700
Attorneys for Steven C. Brigham, M.D.

IN THE MATTER OF THE
SUSPENSION OR REVOCATION OF
THE LICENSE OF

STEVEN C. BRIGHAM, M.D.,

TO PRACTICE MEDICINE AND
SURGERY IN THE STATE OF
NEW JERSEY

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
STATE BOARD OF MEDICAL EXAMINERS

Administrative Action

**ANSWER TO FIRST AMENDED
VERIFIED COMPLAINT**

Respondent, Steven C. Brigham, M.D., by and through its attorneys, Brach Eichler L.L.C., by way of Answer to Complainant's First Amended Verified Complaint, says:

GENERAL ALLEGATIONS

1. Respondent admits the allegations contained in Paragraph 1 of the General Allegations of the First Amended Verified Complaint ("Complaint").
2. Respondent admits the allegations contained in Paragraph 2 of the General Allegations of the Complaint.
3. Respondent admits the allegations contained in Paragraph 3 of the General Allegations of the Complaint.

4. Respondent denies the allegations set forth in the first sentence of Paragraph 4 of the General Allegations of the Complaint. The business located at 1, Alpha Avenue, Suite 20, Voorhees, New Jersey 08043 is a medical office. Furthermore Respondent denies that 1 Alpha Avenue, Suite 27, Voorhees, New Jersey 08043 is his principal office. Respondent admits the second and third sentence contained in such Paragraph.

5. Respondent denies the allegations set forth in Paragraph 5 of the General Allegations of the Complaint.

6. Respondent admits the allegations set forth in the first sentence of Paragraph 6 of the General Allegations of the Complaint. Respondent denies the remaining allegations set forth in such paragraph.

7. Respondent admits the allegations set forth in Paragraph 7 of the General Allegation of the Complaint.

COUNT I

8. Respondent repeats its response to the General Allegations of the Complaint as if fully set forth herein and incorporated by reference.

9. Respondent admits the allegations set forth in Paragraph 9 of Count I of the Complaint.

10. Respondent denies the allegations set forth in Paragraph 10 of Count I of the Complaint.

11. Respondent admits the allegations set forth in Paragraph 11 of Count I of the Complaint.

12. Respondent admits the allegation set forth in Paragraph 12 of Count I of the Complaint. However, Respondent denies that Cytotec is an abortive agent.

13. Respondent denies the allegations set forth in Paragraph 13 of Count I of the Complaint.

14. Respondent denies the allegations set forth in the first sentence of Paragraph 14 of Count I of the Complaint. Respondent denies allegations set forth in the second sentence of such Paragraph, except that Respondent admits that patient S.D. had an abortion performed prior to patient D.B.

15. Respondent denies the allegations set forth in Paragraph 15 of Count I of the Complaint.

16. Respondent admits the allegations set forth in Paragraph 16 of Count I of the Complaint.

17. Respondent denies the allegations set forth in Paragraph 17 of Count I of the Complaint.

18. Respondent denies the allegations set forth in Paragraph 18 of Count I of the Complaint.

19. As to the allegations set forth in Paragraph 19 of Count I of the Complaint, Respondent denies that prior to completion of the D&E segment of the abortion procedure, a complication was encountered. However, Respondent admits the D.B. was transported to Union Hospital by car, driven and/or accompanied by Respondent and Dr. Riley.

20. Respondent does not have sufficient information to respond to the allegations set forth in Paragraph 20 of Count I of the Complaint and leaves Complainant to her proofs.

21. Respondent denies the allegations set forth in Paragraph 21 of Count I of the Complaint.

22. Respondent denies the allegations set forth in Paragraph 22 of Count I of the Complaint.

COUNT II

23. Respondent repeats his responses to the allegations set forth in the General Allegations and Count I as if fully set forth herein and incorporated by reference.

24. Respondent denies the allegations set forth in Paragraph 24 of Count II of the Complaint.

25. Respondent denies the allegations set forth in Paragraph 25 of Count II of the Complaint.

26. Respondent denies the allegations set forth in Paragraph 26 of Count II of the Complaint.

27. Respondent denies the allegations set forth in Paragraph 27 of Count II of the Complaint.

28. Respondent denies the allegations set forth in Paragraph 28 of Count II of the Complaint.

29. Respondent admits the allegations set forth in Paragraph 29 of Count II of the Complaint.

30. Respondent admits the allegations set forth in Paragraph 30 of Count II of the Complaint.

31. As to the allegations set forth in Paragraph 31 of Count II of the Complaint, Respondent admits only that an Order was issued on August 25, 2010 stating that Dr. Brigham "shall immediately cease and desist practicing medicine without a license" in the State of Maryland. Respondent denies the remaining allegations set forth in such paragraph.

32. Respondent denies the allegations set forth in Paragraph 32 of Count II of the Complaint.

33. Respondent denies the allegations set forth in Paragraph 33 of Count II of the Complaint.

COUNT III

34. Respondent repeats his responses to the allegations set forth in the General Allegations, Count I and Count II of the Complaint as if fully set forth herein and incorporated by reference.

35. Respondent admits the allegations set forth in Paragraph 35 of Count III of the Complaint.

36. Respondent admits the allegations set forth in Paragraph 36 of Count III of the Complaint.

37. Respondent has insufficient information to respond to the allegations set forth in Paragraph 37 of Count III of the Complaint and leaves Complainant to her proofs.

38. Respondent admits the allegations set forth in Paragraph 38 of Count III of the Complaint.

39. Respondent admits the allegations set forth in Paragraph 39 of Count III of the Complaint.

40. Respondent admits the allegations set forth in Paragraph 40 of Count III of the Complaint.

41. Respondent admits the allegations set forth in Paragraph 41 of Count III of the Complaint.

42. Respondent admits the allegations set forth in the first, second and fourth sentences of Paragraph 42 of Count III of the Complaint. Respondent denies the allegations set forth in the third sentence of such Paragraph.

43. Respondent admits the allegations set forth in Paragraph 43 of Count III of the Complaint.

44. As to Paragraph 44 of Count III of the Complaint, Respondent admits the allegations set forth in the first sentence of such Paragraph. Respondent denies the remaining allegations set forth in such paragraph.

45. Respondent admits the allegations set forth in Paragraph 45 of Count III of the Complaint.

46. Respondent denies the allegations set forth in Paragraph 46 of Count III of the Complaint.

47. Respondent denies the allegations set forth in Paragraph 47 of Count III of the Complaint.

48. Respondent denies the allegations set forth in Paragraph 48 of Count III of the Complaint.

49. Respondent denies the allegations set forth in Paragraph 49 of Count III of the Complaint.

50. Respondent denies the allegations set forth in Paragraph 50 of Count III of the Complaint.

51. Respondent denies the allegations set forth in Paragraph 51 of Count III of the Complaint.

COUNT IV

52. Respondent repeats his responses to the allegations set forth in the General Allegations, Count I, Count II and Count III of the Complaint as if fully set forth herein and incorporated by reference.

53. Respondent denies the allegations set forth in Paragraph 53 of Count IV of the Complaint as he did not receive a Demand for Statement in Writing Under Oath from the New Jersey State Board of Medical Examiners. Respondent received the Demand for Statement in Writing Under Oath from the Attorney General of New Jersey.

54. Respondent admits the allegations set forth in Paragraph 54 of Count IV of the Complaint. However, the extension of time to submit a response to the Board's demand was requested by the Attorney General's Office, not Respondent.

55. Respondent admits the allegations set forth in Paragraph 55 of Count IV of the Complaint.

56. Respondent denies the allegations set forth in Paragraph 56 of Count IV of the Complaint.

57. Respondent admits the allegations set forth in Paragraph 57 of Count IV of the Complaint.

58. Respondent denies the allegations set forth in Paragraph 58 of Count IV of the Complaint.

59. Respondent denies the allegations set forth in Paragraph 59 of Count IV of the Complaint.

60. Respondent denies the allegations set forth in Paragraph 60 of Count IV of the Complaint.

COUNT V

61. Respondent repeats his responses to the allegations set forth in the General Allegations, Count I, Count II, Count III and Count IV of the Complaint as if fully set forth herein and incorporated by reference.

~~62. Respondent admits the allegations set forth in Paragraph 62 of Count V of the~~
Complaint.

63. Respondent admit the allegations set forth in Paragraph 63 of Count V of the Complaint except that Respondent did not treat patient S.B. at Virtua West New Jersey Hospital.

64. Respondent denies the allegations set forth in Paragraph 64 of Count V of the Complaint.

65. Respondent denies the allegations set forth in Paragraph 65 of Count V of the Complaint.

66. Respondent denies the allegations set forth in Paragraph 66 of Count V of the Complaint.

67. Respondent denies the allegations set forth in Paragraph 67 of Count V of the Complaint.

COUNT VI

~~68. Respondent repeats his responses to the allegations set forth in the General~~
Allegations, Count I, Count II, Count III, Count IV and Count V of the Complaint as if fully set forth herein and incorporated by reference.

69. Respondent admits the allegations set forth in the first sentence of Paragraph 69 of Count VI of the Complaint except that Respondent was not the only physician responsible for

the care of patient M.L. Respondent admits the remaining allegations set forth in such Paragraph.

70. Respondent admits the allegations set forth in Paragraph 70 of Count VI of the Complaint.

~~71. Respondent denies the allegations set forth in Paragraph 71 of Count VI of the~~
Complaint.

72. Respondent denies the allegations set forth in Paragraph 72 of Count VI of the Complaint.

73. Respondent denies the allegations set forth in Paragraph 73 of Count VI of the Complaint.

SEPARATE DEFENSES

1. The Complaint is barred by the doctrines of collateral estoppel and res judicata.
2. The New Jersey State Board of Medical Examiners has no jurisdiction over the ~~conduct of Respondent outside the State of New Jersey.~~
3. No disciplinary or criminal action was taken by the State of Maryland against Respondent.
4. The Cease and Desist Order issued by the State of Maryland on or about August 25, 2010 was issued without affording Respondent due process of law.
5. The entrance of a temporary suspension of Respondent's license would be contrary to the previous orders and actions of the New Jersey State Board of Medical Examiners.
6. The medical care provided by Respondent was consistent with applicable standards of medical care.

WHEREFORE, Respondent demands the Complaint be dismissed and that he be reimbursed for the costs and attorney's fee incurred by him for the defense of this matter.

BRACH EICHLER, L.L.C.
Attorneys for Respondent
Steven C. Brigham, M.D.

By: _____


JOSEPH M. GORRELL, ESQ.

DATED: September 21, 2010