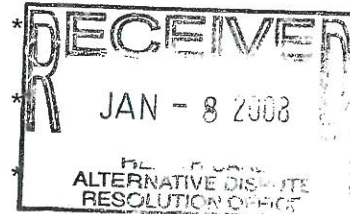


Death of mother during delivery 7

IN THE HEALTH CLAIMS ALTERNATIVE DISPUTE RESOLUTION OFFICE

**SHARON D. KELSEY, ESQUIRE**  
**Personal Representative** of the Estate of  
DE'ANGELA J. KITTRELL, deceased  
9200 Basil Court, Suite 550  
Largo, Maryland 20774



and

**TA'JAENA D. SMITH, a minor, as**  
**Surviving Daughter** of  
DE'ANGELA J. KITTRELL, deceased,  
by and through her Father and  
Next Friend, Carlos Smith  
11744 South Laurel Drive  
Laurel, Maryland 20707

and

**LAVERNE W. KITTRELL,**  
as **Surviving Mother** of  
DE'ANGELA J. KITTRELL, deceased  
11412 Brandywine Road  
Clinton, Maryland 20735

and

**ANTHONY KITTRELL, Individually,**  
as **Surviving Father** of  
DE'ANGELA J. KITTRELL, deceased  
18302 Sumter Road  
Culpeper, Virginia 22701

Claimants,

v.

HCA No.: 2008-007

**HAROLD O. ALEXANDER, M.D.**  
7610 Pennsylvania Avenue Suite # 305  
Forestville, Maryland 20747

**SERVE: HAROLD O. ALEXANDER, M.D.**  
7610 Pennsylvania Avenue  
Suite # 305  
Forestville, Maryland 20747

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& WELLS, LLP

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ATTORNEYS AT LAW  
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(301) 762-5150

and \*

**LAUREN R. RODGERS, M.D.** \*  
6196 Oxon Hill Road, Suite 630 \*  
Oxon Hill, Maryland 20745 \*

**SERVE: LAUREN R. RODGERS, M.D.** \*  
6196 Oxon Hill Road, Suite 630 \*  
Oxon Hill, Maryland 20745 \*

and

**DIMENSIONS HEALTH CARE ASSOCIATES, INC.** \*  
3001 Hospital Drive \*  
Cheverly, Maryland 20875

**SERVE: STEVEN R. SMITH** \*  
Executive Office Suite 400 \*  
3001 Hospital Drive \*  
Cheverly, Maryland 20875

and \*

**DIMENSIONS HEALTH CORPORATION d/b/a** \*  
**PRINCE GEORGE'S HOSPITAL CENTER** \*  
3001 Hospital Drive \*  
Cheverly, Maryland 20875 \*

**SERVE: ERIK BOAS** \*  
Corporate Finance Department \*  
Suite D1000 \*  
7300 Van Dusen Road \*  
Laurel, Maryland 20707 \*

Health Care Providers \*

\*\*\*\*\*

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**STATEMENT OF CLAIM**

COME NOW the Claimants, ShaRon D. Kelsey, Esquire, Personal Representative of the Estate of De'Angela J. Kittrell, deceased; Ta'Jaena D. Smith, a minor, as surviving Daughter of De'Angela J. Kittrell, deceased, by and through her Father and Next Friend, Carlos Smith; LaVerne W. Kittrell, biological mother of Decedent De'Angela J. Kittrell; and Anthony Kittrell, biological father of De'Angela J. Kittrell, by their attorneys, Gregory K. Wells and Shadoan, Michael & Wells, LLP., and bring this action against Health Care Providers Harold O. Alexander, M.D., Lauren D. Rodgers, M.D., Dimensions Health Care Associates, Inc., and Dimensions Health Corporation. In support of their claim, the Claimants allege as follows:

### PARTIES

1. Claimant ShaRon D. Kelsey is the Personal Representative of the Estate of De'Angela J. Kittrell, who died on June 11, 2007, having been appointed as such by Register of Wills of Prince George's County, Maryland on July 17, 2007.

2. Claimant Ta'Jaena D. Smith, is the minor daughter of decedent De'Angela J. Kittrell and Carlos Smith, born to decedent and Carlos Smith on June 4, 2007. Claimant Ta'Jaena D. Smith brings this action through her father and next friend, Carlos Smith, with whom she resides at 11744 South Laurel Drive, Laurel, Prince George's County, Maryland.

3. Claimant LaVerne W. Kittrell is, and at all times relevant herein was, an adult resident of the State of Maryland, currently residing at 11412 Brandywine Road, Clinton, Prince George's County, Maryland. Claimant LaVerne W. Kittrell is the biological mother of Decedent De'Angela J. Kittrell.

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4. Claimant Anthony Kittrell is, and at all times relevant herein was, an adult resident of the State of Virginia, residing at 18302 Sumter Road, Culpeper, Virginia. Claimant Anthony Kittrell is the biological father of Decedent De'Angela J. Kittrell.

5. At all times relevant hereto, Health Care Provider Dimensions Health Corporation d/b/a Prince George's Hospital Center, conducted business as a health care facility located in Prince George's County, Maryland, duly licensed and accredited, providing health care and hospital services, including, but not limited to, obstetrical, critical care and intensive care services, to those persons in need thereof. At all times relevant to this claim, Health Care Provider Dimensions Health Corporation d/b/a Prince George's Hospital Center owed a duty to Claimants' decedent to provide medical care and treatment consistent with the applicable prevailing standards of care. Health Care Provider Dimensions Health Corporation d/b/a Prince George's Hospital Center, held out to the general public, and to Claimants' decedent in particular, that the health care providers attending to Claimants' decedent at Prince George's Hospital Center were agents, servants and/or employees of Dimensions Health Corporation d/b/a Prince George's Hospital Center. Claimants' decedent believed such representation and relied on the same for purposes of receiving her medical care while at Prince George's Hospital Center.

6. At all times relevant hereto, Health Care Provider Dimensions Health Care Associates, Inc., provided health care services including, but not limited to, obstetrical, critical care and intensive care services, to those persons in need thereof at Prince George's Hospital Center in Prince George's County, Maryland, through duly licensed health care professionals. At all times relevant to this claim, Health Care Provider

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9. The amount in controversy exceeds the limit of the concurrent jurisdiction of the District Court of Maryland.

10. Venue in this matter is appropriate in Prince George's County, Maryland pursuant to §6-201(a) and (b), and 6-202 (8) of the Courts and Judicial Proceedings Article, Maryland Annotated Code.

#### **FACTS COMMON TO ALL COUNTS**

11. On or about June 4, 2007, De'Angela J. Kittrell, then 20 years old, was admitted to Prince George's Hospital Center for induction/augmentation of labor for a term pregnancy. De'Angela Kittrell was admitted to Prince George's Hospital Center by Health Care Provider Harold O. Alexander, M.D., under his service and care. Dr. Alexander also provided prenatal care to De'Angela Kittrell.

12. De'Angela Kittrell delivered her daughter, Ta'Jaena D. Smith, at approximately 9:29 p.m. on June 4, 2007.

13. Shortly after delivery, after transfer from the labor and delivery unit, De'Angela Kittrell began exhibiting signs and symptoms of acute blood loss and severe anemia. The Health Care Providers Harold O. Alexander, M.D., and Lauren R. Rodgers, M.D., and other health care providers who were agents, servants and/or employees of Health Care Providers Dimensions Health Corporation and Dimensions Health Care Associates, Inc., were called to diagnose and treat De'Angela Kittrell during this time period.

14. De'Angela Kittrell's condition worsened. The signs and symptoms of acute blood loss and severe anemia continued and De'Angela Kittrell's condition deteriorated, ultimately leading to her death.



15. De'Angela J. Kittrell was pronounced dead on June 11, 2007, at 4:30 p.m. An autopsy was conducted by the State of Maryland Medical Examiner's Office, which concluded that the cause of death was "Complications of Blood Loss Due to Subinvolution of the Placental Implantation Site." Microscopic examination of the brain showed early signs of brain damage due to insufficient flow of blood/oxygen to the brain.

### COUNT I

#### (Medical Negligence-Survival Action v. Harold O. Alexander, M.D.)

Claimants incorporate herein by reference each and every allegation set forth in paragraphs 1 through 15 above and further state as follows:

16. Claimant ShaRon D. Kelsey, in her capacity as Personal Representative of the Estate of De'Angela J. Kittrell, deceased, files this claim against Health Care Provider Harold O. Alexander, M.D., as a survival action pursuant to Section 7-401(x) of the Estates and Trusts Article.

17. The Health Care Provider Harold O. Alexander, M.D., owed to decedent De'Angela J. Kittrell the duty to exercise the degree of care, skill and judgment expected of reasonably competent health care providers acting in the same or similar circumstances.

18. The Health Care Provider Harold O. Alexander, M.D., failed to exercise the degree of care, skill and judgment expected of reasonably competent health care providers acting in the same or similar circumstances and was negligent in the management, care and treatment of Decedent De'Angela J. Kittrell, including, but not limited to the following particulars:

- a. failed to timely recognize signs and symptoms of acute blood loss/anemia;

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