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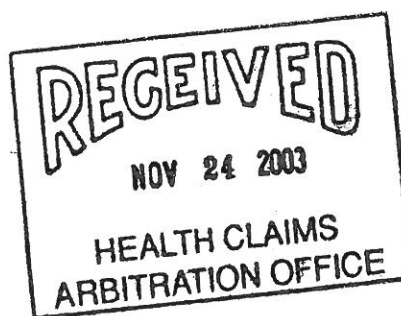
Health Claims Arbitration Office
State of Maryland
6 St. Paul Street, Suite 1501
Baltimore, MD 21202-1608

CLAIM FORM

HCA NO.: _____

CLAIMANTS:

Shayn Dion Berry by his Parents and
Next Friend, Kenric Berry and Trayce
Brown-Berry
322 Ridgley Street
Kettering, Maryland 20774



Kenric Berry
322 Ridgley Street
Kettering, Maryland 20774

Trayce Brown-Berry
322 Ridgley Street
Kettering, Maryland 20774

HEALTH CARE PROVIDERS:

Dimensions Health Corporation
9200 Basil Court Suite 500
Largo, Maryland 20774

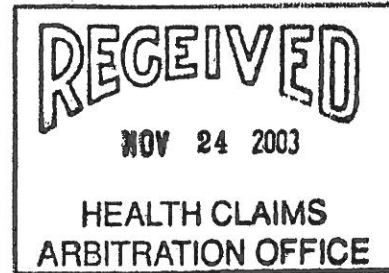
Health Care Provider,

Serve On:
Erik Boas
Corporate Finance Department
Suite D1000
7300 VanDusen Road
Laurel, Maryland 20707

And

Prince George's Hospital Center
3001 Hospital Drive
Cheverly, Maryland 20785

Health Care Provider,
Serve On:
Bridgette Kenrick, Risk Manager
3001 Hospital Drive
Cheverly, Maryland 20785



And

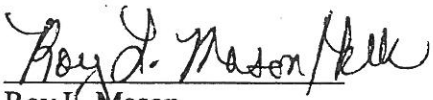
Harold O. Alexander, M.D.
7306 Central Avenue, Suite 1
Capitol Heights, Maryland 20743

- (1) This claim is filed pursuant to Title 3, Subtitle 2A of the Courts Article. The damages are in excess of \$25,000.00 and the appropriate venue is Prince George's County.
- (2) The basis of the claim is described on the page(s) attached hereto.
- (3) The resolution of this claim will involve particular expertise in the area of specialty: emergency medicine; radiology
(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 of the Costs resulting from the filing of this claim, whether it is won or lost; this would be an individual and personal responsibility.

ATTORNEYS FOR CLAIMANTS

CLAIMANTS


Roy L. Mason
Mason, Ketterman & Cawood, P.A.
69 Franklin Street
Annapolis, MD 21401
410-269-6620

Kenric Berry and Tracye
Brown-Berry, Individually
And as Parents and Next
Friends of Shayn Berry, Minor
322 Ridgely Street
Kettering, MD 20785

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HEALTH CLAIMS
ARBITRATION OFFICE

IN THE

MARYLAND

HEALTH CLAIMS

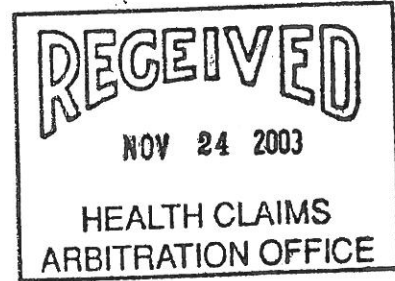
ARBITRATION OFFICE

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Health Care Provider,

Serve On:
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Cheverly, Maryland 20785



And

Harold O. Alexander, M.D.
7306 Central Avenue, Suite 1
Capitol Heights, Maryland 20743

Health Care Provider.

* * * * *

STATEMENT OF CLAIM

The Claimant, Shayn Berry, a minor, by his Parents and Next Friends, Kenric and Trayce Brown-Berry, (herein after collectively referred to as "the Claimants"), by their attorneys, Roy M. Mason, and Mason, Kettermann and Cawood, P.A. hereby sues Health Care Providers, Prince George's Hospital Center, Prince George's Hospital Center (hereinafter "Hospital") and Herbert Alexander, M.D., and for their causes of action state as follows:

PARTIES AND JURISDICTION

1. At all times relevant hereto, Kenric Berry and Trayce Brown-Berry (hereinafter "Mr. and Mrs. Berry") have been married to each other.
2. The Claimants, Mr. and Mrs. Berry are the parents of the minor child Shayn Berry.
3. At all times relevant hereto, the Claimants have been citizens and residents of the State of Maryland.

4. At all times relevant hereto, the Health Care Provider, Harold O. Alexander, M.D., (hereinafter "Dr. Alexander"), has been a physician licensed to practice medicine in Maryland, specializing in Obstetrics and Gynecology in Prince George's County, Maryland, acting individually and through actual and/or apparent agents, servants and/or employees.

5. At all times relevant hereto, the Health Care Provider, Prince George's Hospital Center has been a Corporation, organized in the State of Maryland involved in the operation of a hospital, providing services of labor and delivery as well as newborn nursery services, among other health care services.

6. This claim is for the recovery of damages in excess of twenty-five thousand dollars (\$25,000).

7. Venue is proper in Prince George's County, Maryland.

FACTS COMMON TO ALL COUNTS

8. On or about the morning of November 13, 2000, Mrs. Tracye Brown-Berry, a 35-year-old woman pregnant with twins of 33 weeks gestation presented to Prince George's Hospital Center for antenatal testing.

9. Upon arrival a fetal monitor was placed to monitor the well being of the twins. The monitor indicated that "baby B" was in distress.

10. Many unsuccessful attempts to locate Dr. Alexander were made throughout the morning and afternoon while the fetal monitoring system continued to indicate that "baby B" was in distress.

11. Subsequently, Dr. Alexander arrived at or about 1430 and performed an evaluation of Mrs. Brown-Berry and the fetuses. Mrs. Brown-Berry was taken immediately to the delivery room where a caesarean section was performed. Shayn ("twin B") was born at approximately 1705 on November 13, 2000.

COUNT I
(Medical Malpractice)

The Claimants, hereby sue the Health Care Providers Dimensions Health Corporation, Prince George's Hospital Center (hereinafter collectively "the Hospital") and Harold O. Alexander, M.D. ("Dr. Alexander") and states as follows:

12. The Claimants hereby incorporate by reference and re-allege each of the allegations contained in the previously numbered paragraphs and further state:

13. The Hospital and Dr. Alexander, individually and through their actual and/or apparent agents, servants and/or employees, owed Shayn a duty to exercise reasonable skill and care in his diagnosis, care and treatment.

14. The Hospital and Dr. Alexander, individually and through his actual and/or apparent agents, servants and employees, breached the above described duty of care, thereby deviating from the applicable standards of care and were otherwise negligent, careless, reckless in that they, among other things:

- A. failed to appropriately react to signs, symptoms and findings that illustrated that Shayn was in fetal distress;
- B. failed to provide non-invasive measures known to provide support to a fetus in distress; and
- C. failed to perform a caesarean section in a timely manner.

15. As a direct and proximate result of the Hospital's and Dr. Alexander's negligent diagnosis, care and treatment, Shayn suffered severe and permanent brain damage. Due to the severe nature of his brain damage, Shayn suffers and will continue to suffer:

- A. severe learning disabilities;
- B. severe behavioral abnormalities;
- C. the inability to perform many of his activities of daily living without assistance;
- D. complete loss of earning abilities;
- E. substantial expenses for medical care and treatment; and
- F. substantial expenses for rehabilitative care and therapies.

16. As a direct and proximate result of the Hospital's and Dr. Alexander's negligent diagnosis, care and treatment, Mr. and Mrs. Berry suffer, and will continue to suffer, substantial expenses for medical care and treatment as well as substantial expenses for rehabilitative care and therapies for Shayn until he reaches the age of majority.

17. As a direct and proximate result of the Hospital's and Dr. Alexander's negligent diagnosis, care and treatment, Mr. and Mrs. Berry suffer, and will continue to suffer, the severe emotional pain that accompanies the everyday challenges and obstacles that come with raising a developmentally disabled child.

18. The injuries and damages complained of were directly and proximately caused by the negligence and lack of care of the Hospital and Dr. Alexander. The Claimants, in no way, contributed to the negligence, but however, relied upon the expertise of Dr. Alexander and the Hospital for Shayn's care and treatment.

WHEREFORE, the Claimants, bring this action and seeks damages in excess of Twenty Five Thousand Dollars (\$25,000.00), plus costs.

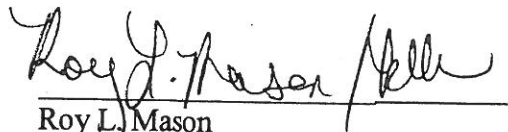
COUNT II
(Loss of Consortium)

The Plaintiffs, Mr. and Mrs. Berry, hereby sue the Hospital and Dr. Alexander and for their causes of action state:

19. The Claimants hereby incorporate by reference and re-allege each of the allegations contained in the previously numbered paragraphs and further state:

20. As a further direct and proximate result of the negligence of the Health Care Providers, Mr. and Mrs. Berry were caused to sustain and suffer loss of consortium to the detriment of their marital relationship and their parental relationship with Shayn.

21. The sole and proximate cause of the injuries sustained to the marital and parental relationship of Mr. and Mrs. Berry is the aforesaid negligence of the Health Care Providers, without any negligence on the part of Mr. and Mrs. Berry contributing in anyway thereto.



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