

SHANNON HALL
906 Corey Court
Mitchellville, Maryland 20721

Plaintiff

v.

HAROLD O. ALEXANDER, M.D.
7610 Pennsylvania Avenue
Forestville, Maryland 20747

and

INTEGRATED OB/GYN
7610 Pennsylvania Avenue, Suite 306
District Heights, Maryland 20747

Serve On:

Harold Alexander, M.D.
7610 Pennsylvania Avenue, #306
District Heights, Maryland 20747

Defendants

IN THE

CIRCUIT COURT

FOR

PRINCE GEORGE'S COUNTY

Case No.:

CAU1-26731

Clerk of the
Circuit Court
OCT 14 AM 10:50
2009 OCT 14 PM 03:00

COMPLAINT

COUNT I

COMES NOW the Plaintiff, Shannon Hall, by her attorneys, Jonathan Schochor, Jonathan E. Goldberg, and Schochor, Federico and Staton, P.A. and sues, Harold O. Alexander, M.D., and Integrated OB/GYN, Defendants:

1. At all times of which the Plaintiff complains, the Defendant Alexander represented to the Plaintiff and the public that he possessed the degree of skill, knowledge and ability possessed by reasonably competent medical practitioners, practicing under the same or similar circumstances as those involving the Plaintiff.

2. The Plaintiff alleges that the Defendant Alexander herein, including duly authorized agents and/or employees of the Defendant Integrated OB/GYN, owed to the Plaintiff the duty to exercise the degree of care, skill and judgment expected of a competent medical practitioner acting in the same or similar circumstances, which duty included the performance of adequate and proper diagnostic tests and procedures to determine the nature and severity of the Plaintiff's condition, careful diagnosis of such condition, employment of appropriate procedures, surgery and/or treatment to correct such conditions without injury upon the Plaintiff, continuous evaluation of the Plaintiff's condition and the effects of such treatment, and adjustment of the course of treatment in response to such ongoing surveillance and evaluation -- all of which the Defendant failed to do.

3. The Defendant Alexander was negligent in that he failed to employ appropriate treatment, surgery, tests and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff's condition, failed to properly and appropriately diagnose the Plaintiff's condition, failed to thoroughly evaluate the effects and results of any tests and/or procedures performed, failed to properly evaluate the effects of chosen treatment, failed to adjust the Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Plaintiff's condition, and was otherwise negligent.

4. The Plaintiff alleges that the Defendant Integrated OB/GYN, through its agents, servants and employees, owed to the Plaintiff a duty to exercise a degree of care, skill and

judgment expected of a competent medical corporation acting in the same or similar circumstances, which duty included the performance of adequate and proper diagnostic tests and procedures to determine the nature and severity of the Plaintiff's condition, careful diagnosis of such condition, employment of appropriate procedures, tests, surgery and/or treatment to correct such conditions without inflicting injury upon the Plaintiff, continuous evaluation of the Plaintiff's condition and effects of such treatment, and the adjustment of the course of treatment in response to ongoing surveillance and evaluation -- all of which the Defendant failed to do.

5. The Defendant Integrated OB/GYN, through its agents, servants and/or employees, was negligent in that it failed to employ appropriate treatment, surgery and/or procedures, failed to carefully and thoroughly evaluate the Plaintiff's condition, failed to thoroughly evaluate the effects and results of any tests, treatment and/or procedures performed, failed to adjust the Plaintiff's treatment in response to appropriate evaluation of the effects of treatment, failed to properly monitor the course of the Plaintiff's condition and treatment, failed to employ adequate and proper diagnostic procedures and/or tests to determine the nature and extent of the Plaintiff's condition, failed to diagnose the Plaintiff's condition and was otherwise negligent. At all times referred to herein, the named Defendant Alexander acted for himself and as a duly authorized agent and/or employee of the Defendant Integrated OB/GYN, acting within the scope of his authority.

6. On July 14, 2008, the Plaintiff, Shannon Hall, a 21-year-old female college student, presented to the Defendant Alexander at his office for an obstetrical consultation. At all times referred to herein, the Defendant Alexander held himself out to be an expert in obstetrics and gynecology. The diagnosis at the time of presentation was a 10-12 week pregnancy, which the Plaintiff requested to terminate. Blood was drawn that day and the Plaintiff was requested to

return the following day, July 15, 2008. As advised, the Plaintiff re-presented on July 15, 2008 and was told that she was, indeed, pregnant. Bloodwork harvested the prior day confirmed an elevated Human Chorionic Gonadotropin (hCG) level. Accordingly, on July 14, 2008, the Defendant performed a Dilation and Curettage (D&C) procedure which was to terminate the pregnancy.

7. Subsequently, the Plaintiff had additional blood draws on July 15, 23, and 28, 2008. All of the blood draws were positive for pregnancy and indicated climbing levels. It is alleged that had the D&C been successful, the hCG's would have demonstrated falling levels -- confirming a terminated pregnancy.

8. Additionally, it is alleged that the D&C pathology report revealed the presence of a molar pregnancy. It is alleged that a molar pregnancy represents a serious condition which can result in cancer and the necessity for timely intervention and treatment. The standards of care required the Defendant Alexander to refer the Plaintiff to a gynecological oncologist for specialized diagnosis, care and intervention. Tragically, the Defendant did nothing.

9. When the Plaintiff completed her last blood draw on July 28, 2008, she understood from the Defendant that the D&C had terminated her pregnancy and she was to go on with her normal activities. In fact, on July 28, 2008, the Defendant wrote a note confirming the fact that the Plaintiff had a molar pregnancy. However, it is alleged that he never advised the Plaintiff that she suffered any abnormal pregnancy or required any specialized care and treatment. Further, the Defendant indicated in his note that the Plaintiff's hCG levels were falling (as would be expected with a normal termination of pregnancy), which was likewise not the case. In fact, it is alleged that the Plaintiff's hCG values were climbing -- indicative of the fact that the molar pregnancy was not effectively removed and that therefore, the pregnancy

could very well progress to a malignancy and the requirement for emergency, life saving procedures.

10. Due to the Defendant's ongoing negligence, the Plaintiff began to hemorrhage upon returning home after attending classes on October 10, 2008. She also began to suffer severe abdominal pain. She was taken to a local hospital's emergency department where it was determined that her beta-hCG level was 200,000 -- and a diagnosis of an invasive gestational trophoblastic malignancy was made. She was immediately transferred to another referral hospital and seen by a gynecologic oncologist. She was taken to an operating room where all attempts to save her uterus were unsuccessful due to the size and invasive nature of the malignancy. It is asserted that due to the Defendant's ongoing negligence, the molar pregnancy was not effectively terminated and was left to grow, extend and ultimately metastasize. Accordingly, the oncologic surgeon had no choice but to perform a total abdominal hysterectomy on the Plaintiff -- a 21-year-old college student who had no children. Further, it is alleged that as a result of the Defendant's negligence, the Plaintiff suffered with cancer which additionally involved her lungs. Accordingly, she required chemotherapeutic agents on a continuing basis in an effort to arrest the disease process.

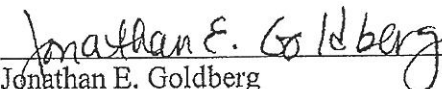
11. It is alleged that had the Defendant conformed with the applicable standards of care, the molar pregnancy would have been diagnosed in a timely fashion. The pregnancy would have been effectively removed and the Plaintiff provided with any additional intervention necessary for the ability to bear children normally in the future. However, as the direct and proximate result of the ongoing negligence of the Defendant, the Plaintiff has been left with a total hysterectomy as well as a diagnosis of cancer for the remainder of her life.

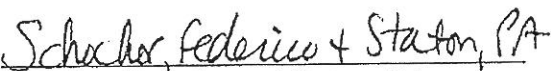
12. It is alleged that the Plaintiff has in the past, is presently and will in the future continue to suffer excruciating physical pain, emotional anguish as well as fear and anxiety over her condition. Additionally, she has in the past, is presently, and will in the future continue to incur hospital, surgical, pharmacological and other losses and expenses for which claim is made.

13. The Plaintiff has lost her former state of physical and emotional well-being, has lost her ability to bear children, and faces the prospect of battling cancer for the rest of her life. The Plaintiff refers to the negligence of these Defendants and each of them as the sole and proximate cause of all of the injuries, damages and disability with which she suffers, with the Plaintiff being in no way contributorily negligent.

14. The negligence complained of occurred in Prince George's County. Venue is claimed in Prince George's County. The amount in controversy exceeds Thirty Thousand Dollars (\$30,000.00).


Jonathan Schochor


Jonathan E. Goldberg


Schochor, Federico and Staton, P.A.
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1211 St. Paul Street
Baltimore, Maryland 21202
(410) 234-1000

Attorneys for the Plaintiff

SHANNON HALL

Plaintiff

v.

HAROLD O. ALEXANDER, M.D., et al

Defendants

IN THE

CIRCUIT COURT

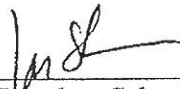
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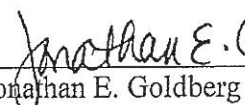
PRINCE GEORGE'S COUNTY

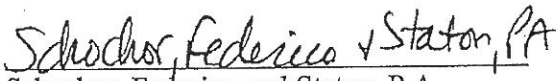
Case No.:

ELECTION FOR JURY TRIAL

The Plaintiff in this case elects to try her case before a Jury.


Jonathan Schochor


Jonathan E. Goldberg


Schochor, Federico and Staton, P.A.
The Paulton
1211 St. Paul Street
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(410) 234-1000

Attorneys for the Plaintiff



Shannon Madden Marshall

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Baltimore, Maryland 21202

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November 9, 2012

PERSONAL & CONFIDENTIAL

Harold Alexander, M.D.

1708 Kings Manor Drive

Mitchellville, MD 20721

Re: Hall v. Alexander

Dear Dr. Alexander:

Pursuant to our numerous recent discussions, due to the exhaustion of your retainer and your current inability to pay for our continued legal services, we must with regret move to withdraw our appearance on your behalf. At this point, you have the option of retaining alternate counsel or notifying the court clerk's office (Circuit Court for Prince George's County, Court House, 14735 Main Street, Upper Marlboro, MD 20772) of your intention to proceed in proper person (i.e. without counsel).

It has truly been a pleasure to work on your behalf, and I am happy as always to discuss this with you at your next convenience.

With very best regards,

A handwritten signature in cursive script that reads 'Shannon Madden Marshall'.

Shannon Madden Marshall

SMM/tsc



GOODELL, DEVRIEUX, LEECH & DANN, LLP

ATTORNEYS AT LAW
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SHANNON MADDEN MARSHALL
SMM@GDLDLAW.COM
WRITER'S DIRECT NUMBER
410-783-4058

October 16, 2012

ADMITTED IN MARYLAND
AND THE
DISTRICT OF COLUMBIA

PERSONAL & CONFIDENTIAL

Harold Alexander, M.D.
1708 Kings Manor Drive
Mitchellville, MD 20721

Re: Hall v. Alexander

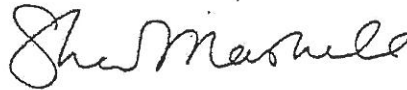
Dear Dr. Alexander:

It has been a pleasure working with you in your defense in the above-referenced matter.

As you may know, the original retainer for our services has been exhausted. At present, Plaintiff is pressing forward with her suit and with discovery depositions, as is her right. The next step in discovery are the depositions of Ms. Gooden and Ms. Harris, as well as those of Plaintiff's expert witnesses. These depositions and associated discovery will require significant time and resources. In order to cover our fees and costs associated with your defense, I would request that you submit a second retainer in the sum of \$10,000. You should be aware that in the event that you elect to have us continue as your counsel through trial, the litigation costs could run an additional \$40,000 to \$50,000.

As always, I would be glad to speak with you at your next convenience about this or any other matter in this litigation. In the meantime, as always, my best regards.

Truly yours,



Shannon Madden Marshall

SMM/tsc

JAN 11 2013

JUDGE PEARSON'S CHAMBERS

SHANNON HALL

Plaintiff

v.

HAROLD O. ALEXANDER, M.D.

and

INTEGRATED OB/GYN

Defendants

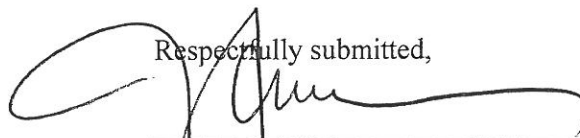
* IN THE
* CIRCUIT COURT
* FOR
* PRINCE GEORGE'S COUNTY
* Case No. CAL 11-26731
*

* * * * *

REQUEST FOR POSTPONEMENT OF TRIAL

1. I, Defendant, Harold O. Alexander, M.D. and Integrated OB/GYN Services, Private Company Trust, am hereby requesting a postponement of twelve months for the trial scheduled for January 28, 2013.
2. In support of this request the following are noted:
 - a. The burden of having to proceed in proper person in a case of this financial magnitude places the Defendant and his trust in an unacceptably, precarious position
 - b. I have been temporarily out of practice since 8/23/12 and anticipate returning to work in late March 2013 and as such have had no income.
 - c. The timing of the withdrawal of prior representation by Craig B. Merkle, Shannon Madden-Marshall and Goodell, DeVries, Leech and Dann, LLP places the Defendant at a severe disadvantage in this case.
 - d. The Defendants trust, Integrated OB/GYN Services, may also be severely disadvantaged by the Defendants inability to be represented by Counsel.
 - e. Additional time will allow the Defendant to attempt to research additional resources to afford representation.
 - f. Specifically monies may be able to be obtained via mortgages on the Defendant's mothers' home or other sources currently being investigated.
 - g. The undersigned Defendant has notified Plaintiffs counsel via copy of this request via certified mail on January 11, 2013.

Respectfully submitted,



Harold O. Alexander, M.D., General Manager
Integrated OB/GYN Services
lobgyn1@verizon.net
1708 Kings Manor Drive
Mitchellville, MD 20721
240-460-5792 (cell)
301-669.1873 (fax)

1/11/13

Date Signed

FILED

11-26731

SHANNON HALL

JAN 15 2013

IN THE

Plaintiff

CLERK OF THE CIRCUIT COURT
FOR PRINCE GEORGES COUNTY, MD.

CIRCUIT COURT

v.

:

FOR

HAROLD O. ALEXANDER, M.D., et al

:

PRINCE GEORGE'S COUNTY

Defendants

:

Case No.: CAL 11-26731

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PLAINTIFF'S MOTION IN LIMINE

COMES NOW the Plaintiff, Shannon Hall, by and through her attorneys, Jonathan Schochor, Jonathan E. Goldberg and Schochor, Federico and Staton, P.A., and moves in Limine and says:

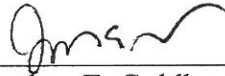
1. This is a medical malpractice case in wherein the Plaintiff alleges the Defendant was negligent and caused her injuries;
2. The Defendant does not have malpractice liability insurance and does not have an attorney representing him in this case;
3. Plaintiff moves that the Defendant be prohibited from telling the jury that he does not have insurance or any other information regarding his financial status. Defendant should also be prohibited from disclosing the fact that he does not have legal counsel and is representing himself due to financial limitations. Any such information would be unfairly prejudicial to the Plaintiff and would serve no purpose other than to try to elicit the jury's sympathy for the Defendant;

WHEREFORE, Plaintiff requests that an Order be entered, in Limine, preventing the Defendant from telling the jury that he does not have malpractice insurance; that he does not

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have legal counsel because of financial considerations; and that he be prohibited from disclosing to the jury any information regarding his financial status.

Respectfully submitted,



Jonathan E. Goldberg
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(410) 234-1000
Attorneys for the Plaintiff