

11-26731

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Clerk of the  
Circuit Court

SHANNON HALL : IN THE  
Plaintiff : 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 PRETRIAL STATEMENT**

**I. Statement of Facts**

This is a claim of medical negligence arising out of care and treatment rendered to the Plaintiff, Shannon Hall, by the Defendants, Harold O. Alexander, M.D. and Integrated OB/GYN. 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. A sonogram was performed which revealed the presence of a molar pregnancy. This is an abnormal pregnancy wherein the tissue that normally becomes a fetus becomes an abnormal growth. A molar pregnancy can be either benign or malignant (invasive). A patient's human chorionic gonadotropin (hCG) level is monitored for patients with a molar pregnancy. If the hCG level decreases to normal levels after the molar pregnancy is removed then it is benign. If the hCG increases, then it is suggestive of an invasive molar pregnancy and requires a referral to a GYN oncologist for treatment. An invasive molar pregnancy that is untreated can become a cancer that can spread to other organs.

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Dr. Alexander terminated the Plaintiff's pregnancy on July 14, 2008 and submitted the pathology for analysis. It was positive for a molar pregnancy. Dr. Alexander gave Ms. Hall lab slips for blood tests to monitor her hCG.

As instructed, the Plaintiff had blood draws on July 15, 23, and 28, 2008. All of the blood draws revealed that the Plaintiff's hCG was decreasing.

The Plaintiff was last examined by Defendant on July 28, 2008. He told her that she only had to have one more blood test and then she would be finished. Plaintiff underwent the blood test on July 31, 2008. It revealed that her hCG had increased. This was a significant finding and required the Defendant to contact the Plaintiff and refer her immediately to a GYN oncologist for treatment of invasive molar disease. Defendant, however, did not notify the Plaintiff of this finding. Plaintiff went without treatment. On October 8, 2008, Plaintiff presented to Prince George's Hospital Center with vaginal bleeding and shock. Her hCG was in excess of 200,000 which is significantly elevated and indicated that she had invasive molar disease. She underwent a D&C, but given the severe nature of her condition she was transferred to Mercy Hospital. She underwent a total abdominal hysterectomy due to the invasive molar disease. She also noted to have vascular invasion and extensive involvement of the left parametrical tissue. She also underwent chemotherapy and required extensive medical treatment.

Had defendant conformed to the standard of care, he would have notified Plaintiff of the increase in her hCG level and referred her to a gynecology oncologist. Had that been done, Plaintiff would not have required a hysterectomy, hospitalizations and much of the treatment that she ultimately received.

**II. Counter Claims, Cross Claims, Third Party Claims**

None.

**III. Amendments to the Pleadings**

None required at this time.

**IV. Simplification or Limitation of Issues**

None at this time.

**V. Stipulations of Fact**

The Plaintiff is willing to stipulate as to the authenticity of the medical records and bills associated with care and treatment rendered to Shannon Hall, without the need to call a custodian.

**VI. Damages**

The Plaintiff is seeking both economic and non-economic damages. Ms. Hall has in the past, is presently and will in the future continue to suffer physical pain, emotional anguish as well as fear and anxiety over the inability to bear children. Additionally, she has in the past, and will in the future incur hospital, surgical, pharmacological and other losses and expenses for which claim is made. Ms. Hall 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.

**VII. Special Damages**

Past medical expenses	\$69,936.27 (to be supplemented)
Non-economic damages	\$650,000.00
Lost tuition:	\$700.00

**VIII. Plaintiffs' Exhibits**

Records and bills from St. Paul Place Specialists

Records and bills from Mercy Medical Center

Records and bills from Neil Rosenshein, M.D.

Records and bills from Prince George's Hospital Center

Records and bills from Leela Krishnamurthy, M.D.

Records, bills and radiology studies from Washington Hospital Center

Records and bills from Harold Alexander, M.D.

Records and bills from Providence Hospital

Records and bills from LabCorp

Curricula Vitae of Plaintiff's expert witnesses, listed below

Photographs of the Plaintiff

Anatomical module and/or illustrations

Enlargements of medical records and/or deposition testimony

**IX. Expert Witnesses**

1. Andrew Bokor, M.D.  
6100 Main Street  
Suite 112  
Columbus, OH 43213  
Specialty: Gynecology
2. Neil Rosenshein, M.D.  
345 St. Paul Place  
Baltimore, Maryland 21202  
Specialty: Gynecologic Oncology
3. Donald P. Goldstein, M.D.  
195 Westerly Road  
Weston, MA 02493  
Specialty: Gynecologic Oncology

**Non-Expert Witnesses**

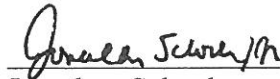
4. Charles John Nosa Akoda, M.D.  
14909 Downy Court  
Bowie, Maryland 20721  
Specialty: Obstetrics & Gynecology

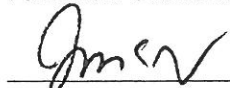
5. Gloria Gooden  
6229 64<sup>th</sup> Avenue  
Riverdale, MD 20737  
Medical Assistant/Fact Witness
6. Teresa Harris  
13 Parkway Road, Apartment 203  
Greenbelt, Maryland 20770  
Medical Assistant/Fact Witness
7. Kevin Hill
8. Doris Hall  
906 Corey Court  
Bowie, MD 20721
9. Andre Hall  
906 Corey Court  
Bowie, MD 20721
10. Sylvia Hall  
2304 14<sup>th</sup> Street, NE  
Washington, DC 20011

The Plaintiffs reserve the right to call as fact or expert witnesses the Defendants and/or any duly authorized actual and/or apparent agents, servants and employees of the Defendants to testify as fact witnesses or as expert medical witnesses.

**X. Other Matters**

Plaintiff has a pending Motion to Strike the Defendants' designation of James Barter, M.D. as an expert witness.

  
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Jonathan Schochor

  
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Jonathan E. Goldberg  
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