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IN THE COURT OF COMMON PLEAS, HAMILTON COUNTY, OHIO  
CIVIL DIVISION

Jessica Raelynn Lewis, A Minor,  
By and through Her Mother  
and Next Friend,  
Keisha Lewis  
Post Office Box 34  
Winchester, OH 45697

and

Keisha Lewis  
Post Office Box 34  
Winchester, OH 45697

and

Kenny Lewis  
Post Office Box 34  
Winchester, OH 45697

A0004070

Plaintiffs,

vs.

Case No.

David B. Schwartz, M.D.  
10506 Montgomery Road  
Cincinnati, OH 45242

Judge:

and

Gynecologic & Obstetric Consultants  
Of Greater Cincinnati  
10506 Montgomery Road  
Cincinnati, OH 45242

and

ORIG. <del>COMP.</del> PARTIES; SUMMONS		
( ) CERT MAIL	( ) SHERIFF	( ) WAVE
( ) PROCESS SERVER	( ) NONE	
CLERKS FEES		TIC
SECURITY FOR COST	450	
DEPOSITED BY	9388	
FILING CODE	A308	

4. On October 29, 1998 Keisha Lewis presented to Bethesda North Hospital at approximately 6:20 p.m. for induction of labor due to elevated blood pressure. Dr. Schwartz performed an artificial rupture of membranes at 9:05 p.m. and moderate meconium stained fluid was noted. Despite a non-reassuring fetal heart rate pattern, a cesarean on Plaintiff Keisha Lewis was not performed until 4:12 a.m. on October 30, 1998. Her apgar scores were 1 & 4 at 1 & 5 minutes respectively.

5. Plaintiff Keisha Lewis further states that the Defendants were professionally negligent and did fall below the standard of care of ordinarily careful and skillful professionals in the care and treatment given Plaintiffs Keisha Lewis and Jessica Raelynn Lewis under the same or similar circumstances, which was a direct and proximate cause of the irreversible, permanent and devastating brain damage from which Jessica Raelynn Lewis is suffering and from which she will suffer for the remainder of his life.

6. Plaintiffs further state that as a result of the negligence of the Defendants and the resultant injuries to Jessica Raelynn Lewis, Jessica Raelynn Lewis will be denied a normal way of life, has and will suffer pain and that she will incur a permanent impairment of her earning capacity, will suffer future pain and that her injuries are permanent and that she, as an adult, will incur future medical and medically related expenses.

#### CLAIM OF PLAINTIFFS KEISHA LEWIS AND KENNY LEWIS

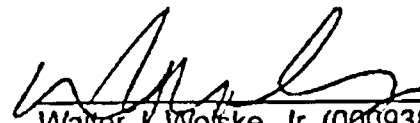
7. Plaintiffs Keisha Lewis and Kenny Lewis state they are the parents of Jessica Raelynn Lewis and hereby incorporate the allegations contained in paragraphs one through six of this Complaint as if fully rewritten herein.

8. Plaintiffs Keisha Lewis and Kenny Lewis further state as a result of the negligence of the Defendants and Jessica Raelynn Lewis's resultant injuries, they have suffered and will suffer in the future a loss of her companionship,

consortium and have sustained medical expenses and will incur future medical and medically related expenses on behalf of Jessica Raelynn Lewis.

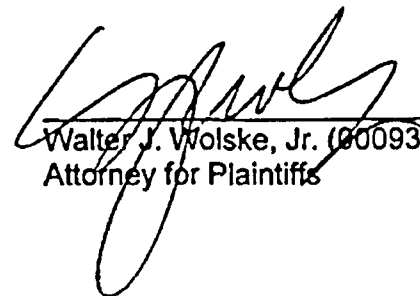
WHEREFORE, Plaintiffs demand judgment against the Defendants, jointly and severally, in an amount greater than twenty five thousand dollars (\$25,000.00), plus interest, costs and all other relief deemed just and equitable by this Court.

Respectfully submitted,

  
Walter J. Wolske, Jr. (0009388)  
**WOLSKE & BARCLAY**  
580 South High Street, Suite 300  
Columbus, Ohio 43215  
614/221-6969 Phone  
614/228-4369 Fax

**JURY DEMAND**

Plaintiffs hereby demand a trial by a jury of eight persons as to all issues contained herein.

  
Walter J. Wolske, Jr. (0009388)  
Attorney for Plaintiffs

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and Next Friend,  
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CIVIL DIVISION

Jessica Raelynn Lewis,  
A Minor, etc., et al.,

Plaintiffs,

Case No. A0004070

v.

David B. Schwartz, M.D., et al.,

Defendants.

INSTRUCTIONS FOR SERVICE

TO THE CLERK OF COURTS:

YOU ARE INSTRUCTED TO MAKE:

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—	PERSONAL SERVICE
—	RESIDENCE SERVICE

UPON:

David B. Schwartz, M.D.  
10506 Montgomery Road  
Cincinnati, OH 45242

And

Gynecologic & Obstetric Consultants  
Of Greater Cincinnati  
10506 Montgomery Road  
Cincinnati, OH 45242

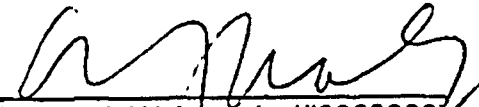
And

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CLERK OF COURTS  
HAMILTON CO. OHIO

Bethesda North Hospital  
10500 Montgomery Road  
Cincinnati, OH 45250

Respectfully submitted,

WOLSKE & BARCLAY

A handwritten signature in dark ink, appearing to read 'W. Wolske, Jr.', written over a horizontal line.

Walter J. Wolske, Jr. (#0009388)  
580 S. High Street, Suite 300  
Columbus, Ohio 43215  
(614) 221-6969

Attorney for Plaintiffs

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# Tracy Winkler

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## Case Summary

**Case Number:** A 0004070  
**Case Caption:** JESSICA RAELYNN LEWIS vs. DAVID B SCHWARTZ  
**Judge:** NORBERT A NADEL  
**Filed Date:** 7/5/2000  
**Case Type:** A306 - PROFESSIONAL TORT AND JURY DEMAND  
**Total Deposits:** \$ 1006.00 Credit  
**Total Costs:** \$ 241.00

## Case Options



## Party/Attorney Info

Name	Party	Attorney	Court ID
<b>Address</b>		<b>Address</b>	
JESSICA RAELYNN LEWIS A MINOR BY HER MOTHER KEISHA LEWIS	P1	WOLSKE JR/WALTER/J	9388
P O BOX 34		SUITE 300 580 SOUTH HIGH STREET	
WINCHESTER OH 45697		COLUMBUS OH 43215	
KEISHA LEWIS	P2		
P O BOX 34			
WINCHESTER OH 45697			
KENNY LEWIS	P3		
P O BOX 34			
WINCHESTER OH 45697			
DAVID B SCHWARTZ	D1	LOCKMEYER/DAVID/S	59188
10506 MONTGOMERY ROAD		6281 TRI RIDGE BOULEVARD SUITE 210	
CINCINNATI OH 45242		LOVELAND OH 45140	
GYNECOLOGIC & OBSTETRIC CONSULTANTS OF GREATER CINCINNATI	D2	LOCKMEYER/DAVID/S	59188
10505 MONTGOMERY ROAD		6281 TRI RIDGE BOULEVARD SUITE 210	
CINCINNATI OH 45242		LOVELAND OH 45140	
BETHESDA NORTH HOSPITAL	D3	HAGGERTY/WALTER/E	5610
10500 MONTGOMERY ROAD		3300 GREAT AMERICAN TOWER 301 EAST FOURTH STREET	
CINCINNATI OH 45250		CINCINNATI OH 45202	

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