

CIVIL ACTION COVER SHEET

DOCKET NO.(S)

01-2986

Trial Court of Massachusetts Superior Court Department



County: Middlesex

PLAINTIFF(S)

Jeanne M. Scalese, Mother and Next Friend of a Minor, Julie M. Scalese

DEFENDANT(S)

The Brigham and Women's Hospital, Inc., Daniel W. Cramer, M.D., and Jane Doe, R.N.

ATTORNEY, FIRM NAME, ADDRESS AND TELEPHONE

Paul Thomas Kearns, Esq. 43 Thorndike St., Cambridge, MA 02141 Board of Bar Overseers number: 554921 (617) 494-8700

ATTORNEY (if known)

Origin code and track designation

Place an x in one box only:

- 1. F01 Original Complaint (X)
2. F02 Removal to Sup.Ct. C.231,s.104 (Before trial) (F)
3. F03 Retransfer to Sup.Ct. C.231,s.102C (X)
4. F04 District Court Appeal c.231, s. 97 &104 (After trial) (X)
5. F05 Reactivated after rescript; relief from judgment/Order (Mass.R.Civ.P. 60) (X)
6. E10 Summary Process Appeal (X)

TYPE OF ACTION AND TRACK DESIGNATION (See reverse side)

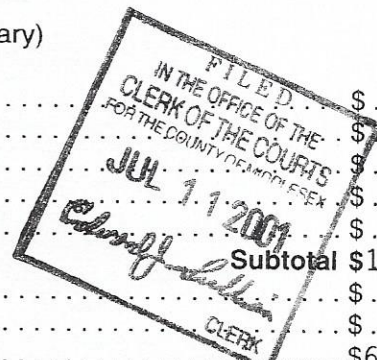
CODE NO. TYPE OF ACTION (specify) TRACK IS THIS A JURY CASE?
B06 Malpractice - Medical (A) (XX) Yes () No

The following is a full, itemized and detailed statement of the facts on which plaintiff relies to determine money damages. For this form, disregard double or treble damage claims; indicate single damages only.

TORT CLAIMS

(Attach additional sheets as necessary)

- A. Documented medical expenses to date:
1. Total hospital expenses \$80,000.00
2. Total Doctor expenses \$730,000.00
3. Total chiropractic expenses
4. Total physical therapy expenses
5. Total other expenses (describe) Visiting Nurse Association \$15,000.00
Subtotal \$125,000.00
B. Documented lost wages and compensation to date
C. Documented property damages to date
D. Reasonably anticipated future medical and hospital expenses \$6,000,000.00
E. Reasonably anticipated lost wages
F. Other documented items of damages (describe)
G. Brief description of plaintiff's injury, including nature and extent of injury (describe)
Plaintiff Julie M. Scalese contracted Citrobacter Meningitis following her birth at The Brigham and Women's Hospital, Inc., on July 12, 1994, with a resulting complicated neurologic course requiring numerous neurosurgical procedures.
TOTAL \$6,125,000.00



CONTRACT CLAIMS

(Attach additional sheets as necessary)

Provide a detailed description of claim(s):

TOTAL \$.

PLEASE IDENTIFY, BY CASE NUMBER, NAME AND COUNTY, ANY RELATED ACTION PENDING IN THE SUPERIOR COURT DEPARTMENT

"I hereby certify that I have complied with the requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods."

Signature of Attorney of Record

Paul Thomas Kearns

DATE: 07/10/2001

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO:

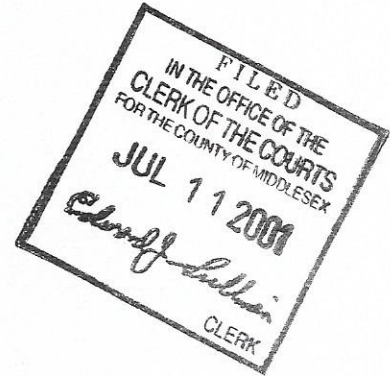
01-2986

JEANNE M. SCALESE, MOTHER AND NEXT
FRIEND OF A MINOR, JULIE M. SCALESE
PLAINTIFF

VS.

THE BRIGHAM AND WOMEN'S HOSPITAL, INC.,
DANIEL W. CRAMER, M.D., and
JANE DOE, R.N.

DEFENDANTS



PLAINTIFF'S COMPLAINT WITH JURY CLAIM

1. The Plaintiff, Jeanne M. Scalse, Mother and Next Friend of a Minor, Julie M. Scalse, resides in Framingham, County of Middlesex, Massachusetts.
2. The Defendant, The Brigham and Women's Hospital, is a hospital/health care facility corporation duly organized and existing under the laws of the Commonwealth of Massachusetts and maintains a principal place of business at 75 Francis Street, Boston, County of Suffolk, Massachusetts.
3. The Defendant, Daniel W. Cramer, M.D., is a licensed medical physician practicing his profession at 850 Boylston Street, Brookline, County of Norfolk, Massachusetts.
4. The Defendant, Jane Doe, R.N., is a licensed nurse, address presently unknown, who was employed by The Brigham and Women's Hospital, Inc., 75 Francis Street, Boston, County of Suffolk, Massachusetts, during July, 1994, and was practicing his/her profession at The Brigham and Women's Hospital, Inc., 75 Francis Street, Boston, County of Suffolk, Massachusetts, during July, 1994.
5. On July 12, 1994, Plaintiff Julie M. Scalse and her twin brother James J. Scalse, were born at The Brigham and Women's Hospital, Inc. via a Caesarean Section Operation performed by Defendant Daniel W. Cramer, M.D.

07/12/01 09:05#0000 9685 CLERK E
 CIVIL 175.00
 SURCHARGE 10.00
 STAMPS 3.00
 012986 #
 SUBTTL 188.00
 TOTAL 188.00
 CHECK 188.00