

CIVIL ACTION COVER SHEET

Trial Court of Massachusetts
SUPERIOR COURT DEPARTMENT

DOCKET NUMBER
93-0511 *12*

SUFFOLK Division

PLAINTIFF(S)

PATRICIA L. PITTS

DEFENDANT(S)

BRIAN WALSH

ATTORNEY(S) FIRM NAME, ADDRESS AND TEL. (617) 337-2716
Patricia L. Pitts, Pro Se
1021 Front Street
South Weymouth, MA 02190
Board of Bar Overseers # (Required)

ATTORNEY(S) (if known)

ORIGIN CODE AND TRACK DESIGNATION

Place an in one box only:

- 1. F01 Original Complaint
- 2. F02 Removal to Sup. Ct. c231, s. 104 (F)
- 3. F03 Retransfer to Sup. Ct. c231, s. 102C (X)

- 4. F04 District Ct. Appeal c231, s. 97 (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	<u>medical malpractice</u>	(A)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

1. PLEASE GIVE A CONCISE STATEMENT OF THE FACTS: (Required in ALL Types of Actions)
This is a civil action alleging medical malpractice. The plaintiff is a 27 year old woman who sustained 4th degree tear after labor and delivery of a baby on January 30, 1990. As a result of the medical care and treatment, she has a recto-vaginal fistula, loss of sphincter muscle control and atrophy. She has had subsequent repair surgery which was unsuccessful. She has incurred thousands of dollars in medical expenses. Her injuries are permanent.

2. IN A CONTRACT ACTION (CODE A) OR A TORT ACTION (CODE B) STATE, WITH PARTICULARITY, MONEY DAMAGES WHICH WOULD WARRANT A REASONABLE LIKELIHOOD THAT RECOVERY WOULD EXCEED \$25,000:

See attached statement pursuant to Superior Court Rule 29.

SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE
FILED
JAN 27 1993
MICHAEL JOSEPH
CLERK OF COURT

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

None. *Patricia L. Pitts*

SIGNATURE OF ATTORNEY OF RECORD OR PLAINTIFF

DATE
1-27-93

OFFICE USE ONLY - DO NOT WRITE BELOW THIS LINE

DISPOSITION

A. Judgment Entered

- 1. Before jury trial or non-jury hearing
- 2. During jury trial or non-jury hearing
- 3. After jury verdict
- 4. After court finding
- 5. After post trial motion

B. No Judgment Entered

- 6. Transferred to District Court under G.L. c.231, s.102C.
- Disposition Date _____

RECEIVED

BY:
DATE

DISPOSITION ENTERED

BY:
DATE

SUFFOLK

SUPERIOR
CIVIL ACTION

PATRICIA L. PITTS,)
 Plaintiff)
)
 V.)
)
 BRIAN WALSH,)
 Defendant)

SUFFOLK
 CIVIL CLERK
 JAN 27 1993
 MICHAEL JOSEPH
 CLERK OF COURT

STATEMENT UNDER RULE 29

This is an action of tort wherein the Plaintiff, Patricia L. Pitts, seeks to recover for injuries sustained as a result of the negligence of the Defendant, Brian Walsh, on or about January 30, 1990.

As a result of the aforesaid negligence of the Defendant, the Plaintiff, age 27, was caused to sustain serious personal injuries, including but not limited to permanent loss of control of anal sphincter muscle with atrophy, subsequent surgery (unsuccessful), recto-vaginal fistulae, and has incurred medical expense in excess of five thousand (\$5,000.00) dollars, and will incur great expense for medical care and treatment, from which she suffered great pain of body and anguish of mind.

The Plaintiff reserves the right to introduce further evidence at the time of trial not herein specified.

The Plaintiff, respectfully, believes that there is a reasonable likelihood of a recovery in excess of TWENTY FIVE THOUSAND (\$25,000.00) DOLLARS.

The Plaintiff, PRO SE,

Patricia L. Pitts

 Patricia L. Pitts
 1021 Front Street
 South Weymouth, MA 02190
 617-337-2716

DATED: January 27, 1993