Person Info Name:STEVEN JOSEPH RALSTON Address Info

Street Address:

Phone PINE EAST
Fax
City Philadelphia
State PA
Zipcode 19107
Country 82
County Philadelphia



County Philadelphia	*
Are you submitting a name change with this renewal?	N
Have you completed your current CE requirements?	Y
Do you hold, or have you ever held, a license, certificate, permit, registration or other authorization to practice any health-related profession in any state or jurisdiction?	Y
If you answered yes to the above question, please provide the profession and state or jurisdiction.	MD Massachusetts
Since your initial application or last renewal, whichever is later, have you had disciplinary action taken against a professional or occupational license, certificate, permit, registration or other authorization to practice a profession or occupation issued to you in any state or jurisdiction of have you agreed to voluntary surrender in lieu of discipline?	NT.
Do you currently have any disciplinary charges pending against your professional or occupational license, certificate, permit or registration in any state or jurisdiction?	N
Since your initial application or last renewal, whichever is later, have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?	N
Since your initial application or last renewal, whichever is later, have you been convicted (found guilty, pled guilty or pled nolo contendere), received probation without verdict or accelerated rehabilitative disposition (ARD), as to any criminal charges, felony or misdemeanor, including any drug law violations? Note: You are not required to disclose any ARD or other criminal matter that has been expunged by order of a court.	N
Do you currently have any criminal charges pending and unresolved in any state or jurisdiction	? N
Since your initial application or last renewal, whichever is later, have you had your DEA registration denied, revoked or restricted?	N
Since your initial application or your last renewal, whichever is later, have you had provider privileges denied, revoked, suspended or restricted by a Medical Assistance agency, Medicare, third party payor or another authority?	N
Since your initial application or your last renewal, whichever is later, have you ever had practice privileges denied, revoked, suspended, or restricted by a hospital or any health care facility?	N
Since your initial application or your last renewal, whichever is later, have you been charged by a hospital, university, or research facility with violating research protocols, falsifying research, or engaging in other research misconduct?	N
Since your initial application or last renewal, whichever is later, have you engaged in the intemperate or habitual use or abuse of alcohol or narcotics, hallucinogenics or other drugs or substances that may impair judgment or coordination?	
Since your initial application or your last renewal, whichever is later, have you been the subject of a civil malpractice lawsuit?	N
if yes, please submit a copy of the entire Civil Complaint, which must include the filing date and the date you were served. PLEASE NOTE: If you previously reported the complaint to the Board you will only need to provide the docket number here:	
lave you completed 2 hours of Board-approved continuing education in child abuse ecognition and reporting?	Y
Do you maintain current medical professional liability insurance in the Commonwealth of Pennsylvania?	Y
f you answer "No", please provide an explanation or reason for an exemption request.	
Please provide the zip code of your primary employer/practice location. This data is being collected for the purpose of identifying healthcare professionals during state emergencies and may be provided to the Pennsylvania Emergency Management Agency for official use only.	19107
Wednesday, November 09, 2016	
ducation Info	
No education records	

	NAME OF THE OWNER.	ATE BOARD OF MEDIC	ALL STATE OF THE S	
RE	ACTIVATIO	n of Status Change Iysician and Surged	APPLICATION 13.16	
	Full Name	RAISTON	STEVEN	Middle 386
SEND TO: STATE BOARD OF MEDICINE P.O. BOX 2649	Address			
	Address			
HARRISBURG, PA 17105-2649 www.dos.pa.gov/med	Address	BOSTON	State MA	- B211
STATE BOARD OF MEDICINE 2601 North Third Street	Email:	191	mail.com	
Harrisburg, PA 17110	License No.	M0051583L 1	elephone No.	
		Name Change		

LICENSES EXPIRE EVERY EVEN NUMBERED YEAR REGARDLESS OF REINSTATEMENT DATE

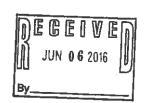
1	APPLICANTS MUST COMPLETE THE FOELOWING:
Ø	Enclose a check or money order, in the amount of \$360.00, made payable to the "Commonwealth of Pennsylvania." If you have been practicing in Pennsylvania beyond the expiration date, include a late fee of \$5 per month or part of a month.
1.	FEES ARE NOT REFUNDABLE. Check or money order must be in "US funds." Note: A processing fee of \$20.00 will be charged for any check or money order returned unpaid by your bank, regardless of the reason for non-payment. Your cancelled check is your receipt of payment.
1.	Complete the legal questionnaire.
3.	If documents will be submitted to the Board under a name different from your present name, submit a copy of the legal document evidencing the name change (i.e., marriage license, divorce decree, etc.).
4	Complete the Verification of Practice / Non-Practice form.
16.	AS APPLICABLE: Attach a current Curriculum Vitae listing all periods of employment or unemployment (i.e., child rearing, research, etc.) for at least the past 10 years. If your initial license in Pennsylvania was issued within the past 10 years, please provide activities from date of initial licensure to the present. The list must be in chronological order, including the month and year, and indicate the state/territory in which the employment occurred.
8	- AS APPLICABLE: Provide an official notification of information (Self Query) from the National Practitioner Data Bank. Please refer to the NPDB website for additional information. When you receive the "Response to your Self Query," forward the entire report directly to the Board Office. You should make a copy for your records.
X.	AS APPLICABLE: Submit copies of your continuing medical education certificates/documentation. Continuing medical education requirements can be found at www.dos.pa.gov/med .
8.	ALL HEALTH-RELATED LICENSEES: Act 31 of 2014 requires that licensees complete at least 2 hours of Board-approved continuing education in child abuse recognition and reporting requirements. Details can be found at www.dos.pa.gov For a list of Board-approved providers, choose the "Act 31 Mandated Child Abuse Reporter Training" link. Verification of completion must be sent electronically directly from the course provider. Please note that it may take 7-10 days for the provider to submit the records to the Board office.
	YOU MUST COMPLETE AND RETURN THIS PAGE OF THE APPLICATION JUN 0 6 2016

PLEASE NOTE: If this application is not completed within aix months, updates of cartain sections and/or supporting documents will be required.

You are hereby reminded that in order to practice in Pennsylvania, you must comply with the professional liability insurance requirements of your profession as required by law and/or regulation.

A reactivation/status change application for a Pennsylvania license/certification which has been inactive/expired/active-retired for four years or more will require a review by the full Board. Please note that the Board has the authority to place conditions on your return to practice in order to protect the health, safety and welfare of the public.

The Board may require applicants who have not actively practiced for four or more years and are requesting reactivation of an expired/inactive/active-retired license/certification to successfully complete a clinical skills evaluation and/or retraining program. This may delay the reactivation of your license until an approved skills evaluation and/or retraining program has been successfully



ACTIVE STATUS - REQUESTING ACTIVE-RETIRED STATUS

- I am retired from practice but desire to keep my license active to treat Immediate family members only. I understand that I am exempt from the medical professional liability insurance and continuing education requirements.
 - Complete Sections A and B.

 - Complete Sections A and 6.

 Return your "Active" wall and wallet licenses.

 Submit a \$5 check or money order made payable to the "Commonwealth of Pennsylvania."

ACTIVE/RETIRED STATUS - REQUESTING ACTIVE STATUS

- ☐ I wish to reinstate my license to an active status. I have completed the continuing education requirements and will hold medical professional liability insurance while practicing in Pennsylvania.
 - Complete Sections A. B and C.
 - Attach a current Curriculum Vitae listing all periods of employment or unemployment (i.e., child rearing, research, etc.) for at least the past 10 years. If your initial license in Pennsylvania was issued within the past 10 years, please provide activities from date of initial licensure to the present. The list must be in chronological order, including the month and year, and indicate the state/territory in which
 - Ilconsure to the present. The treatment of the Market Provide an official notification of information (Self Query) from the National Practitioner Data Bank. Please refer to the NPOB website for additional information. When you receive the "Response to your Self Query," forward the entire report directly to the Board Office. You should make a copy for your records.

 - Submit copies of your continuing education certificates/documentation.
 - Submit a \$5 check or money order made payable to the "Commonwealth of Pennsylvania."

ACTIVE STATUS - REQUESTING INACTIVE STATUS

- I do not wish to practice as a physician and surgeon in the Commonwealth of Pennsylvania and wish to place my license on an inactive status. <u>Junderstand that to reactivate my license. I will need to meet the continuing education requirements, obtain professional liability insurance, and meet any re-entry, clinical skills assessment as required by the Board.</u>
 - Complete Sections A and B.
 - Return your "Active" wall and wallet licenses. No fee is required.

EXPIREDINACTIVE STATUS - REQUESTING ACTIVE STATUS

I wish to reinstate my license to an active status. I have completed the continuing education requirements and will hold professional liability insurance.

Complete Sections A, B and C.

Complete Sections A, B and C.

Attach a current Curriculum Vitae listing <u>all</u> periods of employment or unemployment (i.e., child rearing, research, etc.) for at least the past 10 years. If your initial ficense in Pennsylvania was Issued within the past 10 years, please provide activities from date of initial licensure to the present. The list must be in chronological order, including the month and year, and indicate the state/ferritory in which

The employment examination of information (Self Query) from the National Practitioner Data Bank. Please refer to the NPDB website for additional information. When you receive the "Response to your Self Query," forward the entire report directly to

we account of account internation.

The Board Office. You should make a copy for your receive the transpose ac your centificate focus of the Board Office. You should make a copy for your receive.

Submit copies of your continuing education certificates/focumentation.

Act 31 of 2014 requires all licensees to complete 2 hours of Department of State approved continuing education in child abuse recognition and reporting requirements to reactivate a license.

Submit a \$380 check or money order made psyable to the "Commonwealth of Pennsylvania."

If practicing in Pennsylvania after the license expired, in addition to \$360, submit \$5 per month, or part of a month, since the license

EXPIRED/INACTIVE STATUS - REQUESTING ACTIVE RETIRED STATUS

- □ I wish to reinstate my license to an active-retired status to treat immediate family members only. I understand that I am exempt from the medical professional liability insurance and continuing education requirements.
 - Complete Sections A. B and C.
 - Compare Sections A, D and C.

 Attach a current Curriculum Vitae listing <u>all</u> periods of employment or unemployment (i.e., child rearing, research, etc.) for at least the past 10 years. If your initial license in Pennsylvania was issued within the past 10 years, please provide activities from date of initial licensure to the present. The list must be in chronological order, including the month and year, and indicate the state/ferritory in which
 - the employment occurred.

 Act 31 of 2014 requires all licensees to complete 2 hours of Department of State approved continuing education in child abuse recognition and reporting requirements to reactivate a license.

 - Submit a \$380 check or money order made payable to the "Commonwealth of Pennsylvania."

 If practicing in Pennsylvania after the license expired, in addition to \$380, submit \$5 per month, or part of a

YOU MUST COMPLETE AND RETURN THIS PAGE OF THE APPLICATION

JUN 06 2016

TH	E FOLLOWING		VATION QUESTIO	NS MUST BE AN	IONS: SWERED. If you answer "YES" to	#2 throug	#12,
prov	ide complete detaile	uli a acparate street as	Maries Calumad Copies of	resevant documents.	Sign and date below.	Yes	Ñ
1.	occupation in ar	nave you ever held a lice ny state or jurisdiction?	ense, certificate, permit, i	registration or other auti	norization to practice a profession or and state or jurisdiction.	×	
2.	application deni	ed or refused, or for di	r a professional or occ sciplinary reasons agree in any state or jurisdiction	ed not to apply or reapp	icate, permit or registration, had an ply for a professional or occupational		×
3.	Have you had do authorization to surrender in lieu	practice a profession or	against a professional or occupation issued to yo	r occupational license, c ou in any state or jurisdi	ertificate, permit, registration or other otion or have you agreed to voluntary		X
4.	Do you currently or registration in	have any disciplinary o any state or jurisdiction	charges pending against	your professional or co	cupational license, certificate, permit		X
5.	rehabilitative dis	position (ARD), as to ar	pled guilty or pled noto c ny criminal charges, fetor D or other criminal matte	ny or misdemeanor, incl	obation without verdict or accelerated uding any drug law violations? Note: ad by order of a court.		X
6.	Do you currently	have any criminal charg	pes pending and unresol	ved in any state or juriso	liction?		X
7.	Have you ever h	ad practice privileges de	enied, revoked, suspend	ed, or restricted by a ho	spital or any health care facility?		
8.	Have you had yo	ur DEA registration den	ied, revoked or restricted	1?			X
9.	Have you had pu	Have you had provider privileges denied, revoked, suspended or restricted by a Medical Assistance agency, Medicare, third party payor or another authority?					4
10.	Have you been o	Have you been charged by a hospital, university, or research facility with violating research protocols, falsitying research, or engaging in other research misconduct?					X
11.	Have you engag	Have you engaged in the intemperate or habitual use or abuse of alcohol or narcotics, hallucinogenics or other drugs of substances that may impair judgment or coordination?					
12.	Have you been the subject of a civil majoractice lawsuit? If yes, please submit a copy of the entire Civil Complaint.					×	
		SECTI	ON B≟ VERIFIC	ATION OF INF	ORMATION - ALEE-		
am an applic of 18	ware of the criminal ation are true and co	penalties for tempering prect to the best of my l	with public records or tr crowledge, information a	nformation under 18 Pa and belief. understand	as not been aftered or otherwise mod . C.S. Section 4911. I verify that the that false statements are made subjected, revocation, or denial of my f	atatement act to the p	s in this enaities
Full N	All Name Last PAUSTON First STEVEN Middle (105EP				ОН		
	at Security # Date of Birth		A 1 1				
Name	e of ersity or	Columbia	College of		Year of Graduation	n 190	10
Signa					Date	<u> </u>	

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YOU MUST COMPLETE AND RETURN THIS PAGE OF THE APPLICATION $^{4}\,$



	SECTION C - VERIFICA	TION OF PRACTICE/NON-F	RACTICE
	VERIFICATION OF	PRACTICE / NON-PRA	CTICE
	Your reactivation cannot be	processed unless this page is	completed ***
Full Name	Ralston	Steven Steven	Middle Joseph
License No.	MD Ø51583L		
4 Have you	at you are familiar with the definition lains to the ficense you are reactivable engaged in or practiced in your profession it on inactive status?	ng: I HEN, answer the following	questions. No.
2. Have you Pennsylvan	been employed by the federal governmental license lapsed or since you placed it on it	ent in the practice of your professi nactive status?	
application are true	dication is in the original format as supplied by the rithral penalties for tempering with public records and correct to the best of my knowledge, infor C.S. § 4904 (relating to unaworn falsification to a registration.	or Hill Handli Blidge To Fat. C.S. Section 4	1911. I verify that the statements in this
Printed Name of Lice	KALSTON C	STEVEN J	DSEPH
Signature of License	e ·		LL (b



SLOANE AND WALSH

A PROFESSIONAL LIMITED LIABILITY PARTMERSHIP
ATTORNEYS AT LAW

WELLIAM J. DAYLEY, JR.
JONN P. RYAN * (RI)
ROBERT H. GAYNOR
EDWARD T. HINCHEY
LAWRENCE J. RENNEY, JR.
ANTHONY J. ANTONELLS * (NH)
WILLIAM J. DAILEY III
ANTLENY J. ANTONELLS * (NH)
WILLIAM J. DAILEY III
JOHN A. DONOVAN III
JOHN A. DONOVAN III
LAURA MEYER GRECORY
MICHAEL J. KERRIGAN
ROSS A. KIMBALL
JOHN MCCORMACK
TANYA K. OLDENHOIF
BRIAM H. SULLIVAN

THREE CENTER PLAZA BOSTON, MASSACHUSETTS 02108 TELEPHONEL (617) 523-6010 FAX: (617) 227-0927 FAX: (617) 523-2181

RHODE ISLAND OFFICE: 127 DORRANCE STREET PROVIDENCE, R.I. 02903 TELEPHONE: (401) 490-9987

WWW.SLOANEWALSH.COM
WRITER'S DIRECT E-MAIL ADDRESS: WDAILEY)@SLOANEWALSH.COM

LISA A. BOMBARDIERI
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ERN L. CLANCY
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RYAN B. MACDONALD
ROBERT T. HORTON * (RI, NH)
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CHASTSOPHER M. REILLY * (RI)
CHARLES F. ROURKE II
TYSON C. ROY * (RI)
MATTHEW D. RUSH
GAIL M. RYAN * (RI)
TIMOTHY B. SVIEETLAND
NICOLE J. TODESCO * (RI, CT)

*Also admitted

December 19, 2011

Civil Clerk's Office SUFFOLK SUPERIOR COURT Three Pemberton Square, 12th Floor Boston, MA 02108

RE:

Mirlande Joseph, et al. v. Erika L. Peterson, M.D., et al. Suffolk Superior Court Civil Action No.: SUCV2010-01925-H

S&W File No.: NE-362-4133

Dear Sir/Madam:

Enclosed for filing please find an executed Stipulation Of Dismissal With Prejudice And Without Cost (Defendants, Steven J. Ralston, M.D. And Geoffrey P. Wong, M.D., Only).

Thank you for your attention to this matter.

Very truly yours,

. / .41

Enc.

WJDIII:cb

cc:

Donald R. Grady, Jr., Esq. Joseph N Magner, Esq. Paul Donovan

DECEIVED

JUN 0 6 2016

By



COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT Civil Action No.: SUCV2010-01925-H

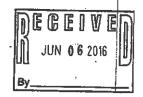
MIRLANDE JOSEPH and
WALTAS JOSEPH, As Parents and Next
Friends of MITJI JOSEPH,
MIRLANDE JOSEPH Individually, and
WALTAS JOSEPH, Individually,
Plaintiffs

٧.

ERIKA L. PETERSON, M.D.,
GEOFFREY P. WONG, M.D.,
CHRISTINA T. THOMAS, M.D.,
STEVEN J. RALSTON, M.D.,
FAYE JUSTICIA-LINDE, M.D. and
TUFTS-NEW ENGLAND MEDICAL CENTER,
Defendants

STIPULATION OF DISMISSAL WITH PREJUDICE <u>AND WITHOUT COST</u> (Defendants, Steven J. Ralston, M.D. and Geoffrey P. Wong, M.D., Only)

The parties to the above action, pursuant to the provisions of Mass. R. Civ. P. 41(a)(1)(ii), hereby stipulate that said action, including all claims and cross-claims, be dismissed with prejudice and without costs to either plaintiffs or defendants, Steven J. Ralston, M.D. and Geoffrey P. Wong, M.D., only.





Respectfully Submitted,
MIRLANDE JOSEPH and WALTAS JOSEPH,
As Parents and Next Friends of
MITJI JOSEPH, MIRLANDE JOSEPH
Individually and WALTAS JOSEPH,
Individually,
The Plaintiffs, By Their Attorneys,

Respectfully Submitted, STEVEN J. RALSTON, M.D. and GEOFFREY P. WONG, M.D., The Defendants, By Their Attorney,

Dofald R Grady, Jr., BBO#544841 Joseph N. Magner, BBO#678599 SHEFF LAW OFFICES, P.C. 10 Tremont Street

Boston, MA 02108

Date: 12-19-1

William J. Dailey, III, BBO#558837 SLOANE AND WALSH, LLP Three Center Plaza

Boston, MA 02108

@sloanewalsh.com

Date: 12 16 11

CERTIFICATE OF SERVICE

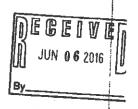
I, William J. Dailey, III, Esq., hereby certify that on December 16, 2011, I served a true copy of the foregoing document, upon the following parties of record, by first class mail, postage prepaid, to:

Donald R. Grady, Esq. Joseph N. Magner, Esq. SHEFF LAW OFFICES, P.C. 10 Tremont Street Daniel Webster Suite Boston, MA 02108

> William J. Dailey, II, BBG#558837/ SLOANE AND WALSH, LLP

Three Center Plaza
Boston MA 02108

<u>usioanewalsh.com</u>



Commonwealth of Massachusetts

SUFFOLK, ss.

SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT CIVIL ACTION

No. 2010-	No. 2010-01925-H		
Mirlande Joseph, et als.	, Plaintiff(s)		
v .			
Erika L. Peterson, M.D., et als.	, Defendant(s)		

1 a		Mirlande Joseph, et als.	, Plaintiff(s)
さま させ			
aim to h d also fi		ν.	
f you cla		Erika E. Peterson, M.D., et als.	, Defendant(s)
complaint. but i		SUMMONS	
wer the 20 day	To the above-named l	Defendant: Steven J. Ralston, M.D.	
to ansv er within		mmoned and required to serve upon Donal f_Law Offices, P.C.	d R. Gredy, Jr.
Dourt	plaintiff's attorney, wh	ose address is 10 Tremont St., 7th Fl.	, Boston, MA , an answer to
NOTICE TO DEFENDANT — You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attomey must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's Office.	the complaint which is exclusive of the day of relief demanded in the	er service of this summons upon you, ault will be taken against you for the answer to the complaint in the office iff's attorney or within a reasonable	
You need not amey must serve	you may have against	provided by Rule 13(a), your answer must stat the plaintiff which arises out of the transacti claim or you will thereafter be barred from ma	on or occurrence that is the subject
ANT I	Witness, Bar July	bara J. Rouse, Esquire, at Boston, the, in the year of our Lord two thousar	26thday ofday of
VOTICE TO DEFENDANT feferse, either you or your niginal in the Clerk's Office		Michael Jose	gh Donovan
OTICE TO fense, effi iginal in th	A true copy Attest:	Edward J. John	Clerk/Magistrate
žőb	NOTES. 1. This summons is issued pursu	thy Sheeff Soffer Octurity into Rule 4 of the Massachusetts Rules of Civil Procedure.	DECENTED.
	When more than one defendant each should be addressed to the	is involved, the names of all defendants should appear in the capit e particular defendant.	m. If a separate superiors is used for each defendant.
		TY: PLEASE CIRCLE TYPE OF ACTION INVOLVED NICLE TORT — (3) CONTRACT — (4) EQUITABLE RELI	INT -

FORM CTV.P. 1 3rd Rev. 10M - 10/08

Commonwealth of Massachusetts County of Suffolk The Superior Court

the wiger fore



CIVIL DOCKET # SUCV2010-01925-H Courtroom CtRm 1015, 3 Pemberton Square, Boston

RE: Joseph et al v Peterson, MD et al

TO: Donald R. Grady, Jr., Esquire Sheff Law Offices 10 Tremont Street 7th Floor Boston, MA 02108

SCHEDULING ORDER FOR A TRACK

You are hereby notified that this case is on the track referenced above as per Superior Court Standing Order 1-88. The order requires that the various stages of litigation described below must be completed not later than the deadlines indicated, and case shall be resolved and judgment shall issue by 04/27/2013

STAGES OF LITIGATION	DEA	DLINES	
	SERVED BY	FILED BY	HEARD BY
Service of process made and return filed with the Court	08/11/2010	08/11/2010	
Response to the complaint filed (also see MRCP 12)		09/10/2010	
All motions under MRCP 12, 19, and 20	09/10/2010	10/10/2010	11/09/2010
All motions under MRCP 15	07/07/2011	08/06/2011	08/06/2011
All discovery requests and depositions served and non-expert depositions completed	05/02/2012		
All motions under MRCP 58	06/01/2012	07/01/2012	
Final pre-trial conference held and/or firm trial date set			10/29/2012
Case shall be resoived and judgment shall issue by 04/27/2013			04/27/2013

- The final pre-trial deadline is not the scheduled date of the conference.
- You will be notified of that date at a later time.
- Counsel for plaintiff must serve this tracking order on defendant before the deadline for filing return of service.

Dated: 05/17/2010

Michael Joseph Donovan Clerk of the Court

Telephone: 617-788-8147

DEGETOR

JUN 0 6 2016

By

Disabled individuals who need handicap accommodations should contact the Administrative Office of the Superior Court at (617) 788-8130 —Check website as to status of case: http://ma.trialcourts.com/feie/status-parket-contact the Administrative Office of the Superior Court at (617)

	CIVIL ACTION C	OVER SHEET	SUPERIOR CO	OF MASSACHUSCTIS URT DEPARTMENT FOLLS	DOCKET NO.	
	PLAINTIFF(S)	Urland Joseph a	and Waltas tji Joseph	TVPE	Brika L. Pet Geoffrey P. Christina T. Steven J. Ra	erson, M.D., Wong, M.D., Thomas, M.D., Tu. Iston, M.D., Tu. Indical Center a Mress, ChyState/Zip.
	Type Plaintiff's / Pl	Attorney name, Addr hone Number and Bl	ess, City/State/Zip 30#	Type Defendant's	new England I Altomey Name, A Phone Number (If	Maran and
- 1	Donald R. Gra Sheff Law Off The Daniel We Boston, MA O	ady, Jr.,Esq.(B Fices, 10 Tremo Boster Suite 12108	BO# 544841B) nt Street			known) lin
cc	DDE NO. TI	TYPE OF A	CTION AND TRACK	DESIGNATION (Se	,	
		actice - Medica			<u> </u>	THIS A JURY CASE?
Th	e following is a fo ney damages. Fo	uil, itemized and de or this form, disreg	etailed statement of gard double or tre	of the facts on whi ble damage claims	ch plaintiff relies i indicate single	to determine damages only.
B.C.D.R.F.	3. Total oction 4. Total phys 5. Total othe Documented pr Reasonably ant Other documen Brief description geyere and pe	ital expenses or expenses or expenses or expenses spractic expenses sical therapy expenses expenses (describ st wages and comproperty damages to licipated lost wages fed items of damag en of plaintiff's injue ermanent injuri eral Palsy, brac ous system dysf	ensation to date date dical expenses and compensation es (describe)	re and extent of ir	ljury (describe)	\$12,269.24 & co \$63,442.26 & co \$75,711.504
ı	edema seconde	ral Palsy, brac ous system dysf ary to hypoxic- halo-hematoma	ischamic annou	halasat.	Total S	fuse cerebral
Provi	ide a detailed des	(Attention of claim(s	CONTRACT (ach additional she):	els as necessary)	DEGET JUN 0 6 Z	
PLEAS	SE IDENTIFY, BY T DEPARTMENT	CASE NUMBER, NAI	ME AND COUNTY,	NY RELATED ACT	PENDING IN	THE SUPERIOR
ndvanja Nigantai	y certify that I have co all requiring that I pro- ger and disadvantages to of Attorney of Recon 3.3-2007		ments of Rule 5 of the Sirmation about relicies about relicies about relicies addy, Jr., Esq.	rpreme Judicial Court l nucreed dispute resoluti Dat	on services and discuss	with them the

gla 🤏

COMMONWEALTH OF MASSACHUSETTS

\$	SUFFOLK, ss.	SUPERIOR COURT CIVIL ACTION NO.:
	· 在京市中央市场中的市场中央市场中央市场市场市场市场市场市场市场市场市场市场市场市场市场市场市场市场	
o: In	MIRLANDE JOSEPH and WALTAS) OSEPH, as Parents and Next Friends) of MITJI JOSEPH, MIRLANDE JOSEPH) odividually, and WALTAS JOSPEH,) idividually,)	
	Plaintiffs)	
	, reduting	
V.	<u> </u>	
CH ST FA	RIKA L. PETERSON, M.D. EOFFREY P. WONG, M.D. IRISTINA T. THOMAS, M.D. EVEN J. RALSTON, M.D. YE JUSTICIA-LINDE, M.D. and FTS-NEW ENGLAND MEDICAL CENTER,	
电电影	Defendants) COMPLAINT AND JURY DEN	IAND
1.		
	The Plaintiffs Minande Joseph and Waltas Joseph	are residents of the
	Commonwealth of Massachusetts, and reside at	Modelan
	Massachusetts, and are married and the parents of	f the Infant-
2.	The Infant-Plaintiff Mitii Jacob	DESEIVED
	The Infant-Plaintiff Mitji Joseph is a resident of the	Commonwealth of
	Massachusetts, and resides at	alden, Massacousetts.
3.	The Defendant Erika L. Peterson, M.D. is a resident Massachusetts; is a physician duly licensed to practice Commonwealth of Massachusetts; limits her practice	of the Commonwealth of

Maternal and Fetal Medicine; and conducts her practice at Tufts-New England Medical Center, 800 East Washington Street, Boston, Massachusetts, 02118.

- 4. The Defendant Geoffrey P. Wong, M.D. is a resident of the Commonwealth of Massachusetts; is a physician duly licensed to practice medicine within the Commonwealth of Massachusetts; limits his practice of medicine to the field of Obstetrics and Gynecology, and conducts his practice at Tufts-New England Medical Center, 750 Washington Street, Boston, Massachusetts, 02111.
- 5. The Defendant Christina Thomas, M.D. is a resident of the Commonwealth of Massachusetts; is a physician duly licensed to practice medicine within the Commonwealth of Massachusetts; limits her practice of medicine to the field of Obstetrics and Gynecology, and conducts her practice at Tufts-New England Medical Center, 750 Washington Street, Boston, Massachusetts, 02111.
- 6. The Defendant Steven J. Ralston, M.D. is a resident of the Commonwealth of Massachusetts; is a physician duly licensed to practice medicine within the Commonwealth of Massachusetts; limits his practice of medicine to the field of Obstetrics and Gynecology, and conducts his practice at Tuffs-New England Medical Center, 800 Washington Street, Boston, Massachusetts, 02111.
- 7. The Defendant Faye Justicia-linde, M.D. is a resident of the Commonwealth of Massachusetts; is a physician duly licensed to practice medicine within the Commonwealth of Massachusetts; limits her practice of medicine to the field of Obstetrics and Gynecology, and conducts her practice at Tufts-New England Medical Center, 750 Washington Street, Boston, Massachusetts, 02111.
- The Defendant Tufts-New England Medical Center is a Massachusetts
 corporation, operating as an accredited hospital duly organized and existing
 under the laws of the Commonwealth of Massachusetts, specifically at 750
 Washington Street, Boston, Massachusetts, 02111, County of Suffolk, and

provided medical care and treatment to the Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph at various and diverse occasions, including but not limited those occasions upon which the instant action is predicated.

COUNTI

Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitti Joseph v, Erika L. Peterson, M.D. (Professional Negligence)

- 9. The Defendant Erika L. Peterson, M.D., ("Dr. Peterson") is and has been a practicing physician, holding herself out to members of the general public as a specialist in Maternal and Fetal Medicine, and further held herself out to members of the general public and more specifically, the Plaintiffs, Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitji Joseph, as a physician who was qualified and competent to advise, to treat, to diagnose, to examine, to provide obstetrical services and maternal services and to administer to her patients concerning their medical, obstetric and maternal medical needs with all necessary care, treatment, and precautions.
- 10. Dr. Peterson held herself out to possess a superior knowledge in the field of Maternal and Fetal Medicine in her relationship with her patients, more specifically, the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph who maintain an inferior position in that regard.
- 11. Dr. Peterson maintained a professional relationship with the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, and treated and advised the Plaintiffs with regard to their maternal, obstetrical and fetal medicine needs, care, diagnosis, and treatment.
- 12. On or about May 19, 2007 and prior thereto, the Plaintiff Mirlande Joseph sought medical and maternal care, services, treatment, attention from Dr. Peterson related to her pregnancy, labor and delivery of the Infant-Plaintiff Mitti Joseph.

- 13. Prior to and including May 19, 2007, Dr. Peterson continuously provided and rendered medical services, advice, care, and treatment to the Plaintiff Mirlande Joseph, during the course of her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 14. During the course of medical care and treatment, the Plaintiff Mirlande Joseph, was examined, followed, treated, attended, and/or cared for by Dr. Peterson on a regular and continuous basis.
- 15. The Plaintiff Mirlande Joseph and Plaintiff Waltas Joseph agreed to pay, and did, in fact, through all available sources, pay reasonable sums for medical care, treatment, and services rendered by all Defendants, including Dr. Peterson.
- During all relevant times hereto, Dr. Peterson was advised, informed of, and did have and possess knowledge of the Plaintiff Mirlande Joseph's medical history and the maternal care and treatment rendered to Mirlande Joseph related to her pregnancy with the Infant-Plaintiff Mitji Joseph, including all risk factors associated with sald pregnancy, labor, progression of labor, onset of labor and delivery.
- 17. During the course of medical and maternal care, services, and treatment to the Plaintiff Mirlande Joseph and her pregnancy and delivery of the Infant-Plaintiff Mitji Joseph, Dr. Peterson was careless, negligent, and committed acts of malpractice, including but not limited to: (a) in failing to properly attend to Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph during the course of her pregnancy and delivery as she had agreed; (b) in failing to order and to perform all necessary, proper, and indicated tests that concerned the progression of the delivery of the Infant-Plaintiff Mitji Joseph; (c) in causing, permitting, and allowing the Infant-Plaintiff Mitji Joseph to sustain and suffer fetal distress while in utero and during the course of delivery; (d) in failing to properly perform appropriate

surgery, including a Caesarian section upon the Plaintiff Mirlande Joseph in order to deliver in a prompt and safe fashion the Infant-Plaintiff Mitji Joseph; (e) in failing to perform all tests which were available and appropriate in a timely fashion; (f) in failing to property advise the Plaintiff Mirlande Joseph of the availability, risk, benefits, and hazards of alternative methods of delivery including Caesarian section; (g) in failing to diagnose, recognize, identify, prevent, treat, or otherwise to determine the presence of a fetal distress during the course of the delivery of the Infant-Plaintiff Mitji Joseph; (h) in failing to note of the presence of meconium staining during the course of the obstetrical care and treatment rendered by Defendant Erika L. Peterson, M.D. and other physicians at the Tufts-New England Medical Center; (i) in failing to note the presence of late fetal heart decelerations during the course of fetal monitoring, thus causing, permitting and allowing the Infant-Plaintiff Mitji Joseph to suffer fetal distress, hypoxia, hypoxic-ischemic events, and anoxia during the course of maternal care and delivery; (j) in failing diagnosis the presence of macrosomia and/or shoulder dystocia, thus causing a brachial plexus injury to the left upper extremity in the Infant-Plaintiff Mitji Joseph; (k) In falling to take all precautions necessary to prevent the injuries suffered by the infant-Plaintiff Mitji Joseph, including proper treatment and care given the risks of pregnancy facing the Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, including hypoxia, an hypoxic-ischemic event, cerebral palsy, Erb's Palsy and brachial plexus injury (I) in failing to take all steps reasonably calculated to avoid the presence of fetal distress and left upper extremity injury to the Infant-Plaintiff Mitji Joseph; (m) in failing to act in accord with good and accepted medical, obstetrical and maternal practices expected, required, and existing under the circumstances, including proper fetal monitoring, proper assessment of macrosomy and proper following of the progression of labor; (n) in failing to take all steps to diagnosis the Plaintiff Mirlande Joseph's risk factors and the Infant-Plaintiff Mitji Joseph's true condition during the course of labor and delivery; (o) in failing to take all steps necessary during the progression of labor, to diagnosis the presence of fetal distress in the Infant-Plaintiff Mitji Joseph; (p) in failing to take all steps during the DE GERM

course of labor to properly monitor the Plaintiff Mirlande Joseph; and (q) in failing to take all measures reasonably calculated to avoid the injuries and damages suffered by the Infant-Plaintiff Mitji Joseph.

- 18. In addition to the above acts and/or omissions, Dr. Peterson failed to act and/or failed to comply with existing standards of medical and/or maternal care and treatment expected, required, and existing under the circumstances.
- 19. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, obstetrical and maternal practice, all of which were a proximate cause of the injuries and damages sustained by the Infant-Plaintiff Mitji Joseph and the Plaintiffs, Mirlande Joseph and Waltas Joseph.
- As a direct and proximate result of the negligence of Dr. Peterson, her agents, 20. servants, and employees and those persons acing under her direction and supervision, the Infant-Plaintiff Mitji Joseph was caused to sustain severe and permanent injuries, including but not limited to: Brain damage; Erb's Palsy, cerebral paisy, left brachial plexus injury, persistent pulmonary hypertension; abnormal EEG studies; a diffuse Central Nervous System Dysfunction; bilateral Grade I cerebral hemorrhage; diffuse cerebral edema secondary to hypoxicischemic injury; bilateral cephalohematoma; severe panplexopathy affecting the brachial plexus nervous system; minimal flexion and extension movements of her left fingers and limited wrist extension and flexion of the left wrist; hypoxic ischemic encephalopathy; palsy at the level of the shoulder and elbow of the left extremity; areflexia of the left arm; severe pain, prolonged suffering; inability to perform and to learn many activities of daily living; developmental delays; cognitive difficulties, weakness, inability to utilize the left upper extremity and other serious and diverse personal injuries, all of the above which are permanent in nature or will have permanent or will have permanent residual effects.

- 21. As a further result of the negligence of Dr. Peterson, the Plaintiffs Mirlande Joseph and Waltas Joseph were obliged to expend various and diverse sums of money for nursing, medicine, medical attention, medical treatment, surgical treatment, physical therapy, and other therapeutic modalities in an effort to treat the Infant-Plaintiff Mitji Joseph, of the injuries sustained as the result of the negligence of Dr. Peterson and the Infant-Plaintiff Mitji Joseph will be obliged to spend further monies for same for an indefinite period of time in the future, all to their great detriment and loss.
- 22. As a further result of the negligence of Dr. Peterson, the Infant-Plaintiff Mitji Joseph, has suffered and will suffer into the future economic losses, vocational losses, loss of earning capacity, and loss of earnings power, all to her great detriment and loss.
- 23. As a further result of the negligence of Dr. Peterson, the Plaintiff Mitji Joseph, has suffered and will suffer future and continued pain, emotional injury, loss of enjoyment of life, consequential damages, suffering, loss of earning capacity, loss of earnings, vocational losses, economic losses and disability from many activities of daily living.
- 24. As a result of the negligence of Dr. Peterson, M.D. the Infant-Plaintiff Mitjl Joseph, has suffered permanent injuries especially with regard to the hypoxicischemic encephalopathy and left upper extremity injury.
- 25. All of the aforesaid occurred by virtue of the negligence of Dr. Peterson and the Co-Defendants; and was in no manner whatsoever caused by any act, or failure to act on the part of the Infant-Plaintiff Mitji Joseph or the Plaintiffs Mirlande Joseph or Waltas Joseph.

WHEREFORE, the Plaintiffs pray judgment and damages of the Defendant Erika L. Peterson, M.D., in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT II

Mirlande Joseph, Individually, v. Erika L. Peterson, M.D. (Professional negligence and Loss of Consortium)

- 26. The Plaintiff Mirlande Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Erika L. Peterson, M.D. the allegations hereinabove set forth in the Introduction, Paragraphs One (1) through Twentyfive (25).
- The Plaintiff Mirlande Joseph is and was at all relative times herein, the mother of the Infant-Plaintiff Mitji Joseph.
- 28. During the course of medical, maternal and obstetrical care, Dr. Peterson acted in a careless and negligent fashion, and committed acts of malpractice(as set forth above) and failed to act in accordance and compliance with existing standards of treatment required, expected or existing under the circumstances.
- 29. These acts, as set forth previously, constitute acts of negligence, professional malpractice and were deviations from good and accepted medical and surgical practice, all of which were a proximate cause of the injuries and damages sustained by the Plaintiffs
- 30. As a direct and proximate result of the negligence of Dr. Peterson, her agents, servants, and employees and those persons under her direction and supervision, the Plaintiff Mirlande Joseph was caused to sustain damages, including but not

limited to, loss of services, society, companionship, loss of consortium, mental anguish, mental, and economic losses as they relate to the medical care and treatment rendered to the Infant-Plaintiff Mitji Joseph.

- 31. As a further result of the negligence of Dr. Peterson, the Plaintiff Mirlande Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical treatment, surgical treatment, physical therapy and other therapeutic modalities in an effort to cure her daughter of the injuries sustained and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.
- 32. As a further result of the negligence of Dr. Peterson, M.D., the Plaintiff Mirlande Joseph suffered pain, emotional pain, suffering, distress and injury due to Dr. Peterson's failures to act in accordance with medical care and treatment with regard to the obstetrical care, maternal care, labor and delivery of the Infant-Plaintiff Mitji Joseph, all to her great detriment and loss.

WHEREFORE, the Plaintiff Mirlande Joseph prays judgment and damages of the Defendant Erika L. Peterson, M.D.in an amount to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT III

Waitas Joseph v. Erika L. Peterson, M.D.

33. The Plaintiff Waltas Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Erika L. Peterson, M.D. all of the allegations hereinabove set forth in Paragraphs One (1) through Thirty-Two (32).

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- 34. The Plaintiff Waltas Joseph is and was at all relevant times the husband of Co-Plaintiff Mirlande Joseph and the father of the Infant-Plaintiff Mitji Joseph.
- 35. During the course of medical care, services and treatment to the Plaintiffs, Mitji Joseph and Mirlande Joseph, Dr. Peterson was careless, negligent, reckless, and committed acts of malpractice, as set forth above with regard to the obstetrical, maternal, labor and delivery care rendered to Mirlande Joseph and the Infant-Plaintiff Mitji Joseph on or before May 19, 2007.
- 36. Dr. Peterson failed to act and/or failed to comply with existing standards of medical and/or surgical care and treatment expected, required, and existing under the circumstances.
- 37. Each and all of the foregoing acts constitutes negligence, professional majoractice, and were deviations from good and accepted medical, maternal and obstetrical practices, all of which were a proximate cause of the damages sustained by the Plaintiff Waltas Joseph, arising from the injuries sustained by Co-Plaintiffs Mirlande Joseph and Mitti Joseph.
- 38. As a direct and proximate result of negligence of Dr. Peterson, her agents, servants, employees, and those persons under her direction and supervision and control, the Plaintiff Waltas Joseph was caused to sustain damages, including but not limited to: loss of services, society, companionships, consortium, mental anguish, mental suffering and economic losses.
- 39. As a further result of the negligence of Dr. Peterson, the Plaintiff Waltas Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical care, medical treatment, surgical treatment, and other therapeutic modalities in an effort to cure his wife and his daughter of the injuries sustained as a result of the negligence of Dr. Peterson and will be obliged to

spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.

40. As a further result of the negligence of Dr. Peterson, the Plaintiff Waltas Joseph as suffered and will continue to suffer into the future an economic loss all to his great detriment and loss.

WHEREFORE, the Plaintiff Waltas Joseph prays judgment and damages of Dr. Peterson, in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT IV

Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitti Joseph v. Geoffrey P. Wong, M.D. (Professional Negligence)

- 41. The Plaintiffs Mirlande Joseph and Waltas Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Geoffrey P. Wong, M.D. ("Dr. Wong") all of the allegations hereinabove set forth in Paragraphs One (1) through Forty (40).
- 42. Dr. Wong is and has been a practicing physician, holding herself out to members of the general public as a specialist in Obstetrics and Gynecology, and further held himself out to members of the general public and more specifically, the Plaintiffs, Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitji Joseph, as a physician who was qualified and competent to advise, to treat, to diagnose, to examine, to provide obstetrical services and gynecological services and to administer to his patients concerning their medical, obstetric and maternal medical needs with all necessary care, treatment, and precautions.

- 43. Dr. Wong held himself out to possess a superior knowledge in the field of Obstetrics and Gynecology in his relationship with his patients, more specifically, the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph who maintain an inferior position in such regard.
- 44. Dr. Wong maintained a professional relationship with the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, and treated and advised the Plaintiffs with regard to their maternal, obstetrical and fetal medicine needs, care, diagnosis, and treatment.
- 45. On or about May 19, 2007 and prior thereto, the Plaintiff Mirlande Joseph sought medical and maternal care, services, treatment, attention from Dr. Wong related to her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 46. Prior to and including May 19, 2007, Dr. Wong continuously provided and rendered medical services, advice, care, and treatment to the Plaintiff Mirlande Joseph, during the course of her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- During the course of medical care and treatment, the Plaintiff Mirlande Joseph was examined, followed, treated, attended, and/or cared for by Dr. Wong on a regular and continuous basis.
- 48. The Plaintiff Mirlande Joseph and Plaintiff Waitas Joseph agreed to pay, and did, in fact, through all available sources, pay reasonable sums for medical care, treatment, and services rendered by all Defendants, including Dr. Wong.
- 49. During all refevant times hereto, Dr. Wong was advised, informed of, and did have and possess knowledge of the Plaintiff Mirlande Joseph's medical history and the maternal care and treatment rendered to Mirlande Joseph related to her

pregnancy, labor and delivery with the Infant-Plaintiff Mitji Joseph, including all risk factors associated with said pregnancy, labor, progression of labor, onset of labor and delivery.

During the course of medical and maternal care, services, and treatment to the 50. Plaintiff Mirlande Joseph and her pregnancy and delivery of the Infant-Plaintiff Mitji Joseph, Dr. Wong was careless, negligent, and committed acts of malpractice, including but not limited to: (a) in failing to properly attend to Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph during the course of her pregnancy, labor and delivery; (b) in failing to order and to perform all necessary, proper, and indicated tests that concerned the progression of the delivery of the Infant-Plaintiff Mitji Joseph; (c) in causing, permitting, and allowing the Infant-Plaintiff Mitji Joseph to sustain and suffer fetal distress while in utero and during the course of delivery; (d) in failing to properly perform appropriate surgery. including a Caesarian section upon the Plaintiff Mirlande Joseph in order to deliver in a prompt and safe fashion the Infant-Plaintiff Mitji Joseph; (e) in failing to perform all tests which were available and appropriate in a timely fashion; (f) in failing to properly advise the Plaintiff Mirlande Joseph of the availability, risk, benefits, and hazards of alternative methods of delivery including Caesarian section; (g) in failing to diagnose, recognize, identify, prevent, treat, or otherwise to determine the presence of a fetal distress during the course of the delivery of the Infant-Plaintiff Mitji Joseph; (h) in failing to note of the presence of meconium staining and fetal distress during the course of the obstetrical care and treatment ;at the Tufts-New England Medical Center; (i) in failing to note the presence of late fetal heart decelerations during the course of fetal monitoring, thus causing, permitting and allowing the Infant-Plaintiff Mitji Joseph to suffer fetal distress, hypoxia, hypoxic-ischemic events, and anoxia during the course of maternal care and delivery; (j) in failing diagnosis the presence of macrosomia and/or shoulder dystocia, thus causing a brachial plexus injury to the left upper extremity in the Infant-Plaintiff Mitji Joseph; (k) in failing to take all precautions necessary to prevent the injuries suffered by the Infant-Plaintiff Mitji Joseph, including proper

treatment and care given the risks of pregnancy facing the Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, including hypoxia, an hypoxicischemic event, cerebral palsy, Erb's Palsy and brachial plexus injury (!) in failing to take all steps reasonably calculated to avoid the presence of fetal distress and left upper extremity injury to the Infant-Plaintiff Mitji Joseph; (m) in failing to act in accord with good and accepted medical, obstetrical and maternal practices expected, required, and existing under the circumstances, including proper fetal monitoring, proper assessment of macrosomy and proper following of the progression of labor; (n) in failing to take all steps to diagnosis the Plaintiff Mirlande Joseph's risk factors and the Infant-Plaintiff Mitji Joseph's true condition during the course of labor and delivery; (o) in failing to take all steps necessary during the progression of labor, to diagnosis the presence of fetal distress in the Infant-Plaintiff Mitji Joseph; (p) in failing to take all steps during the course of labor to properly monitor the Plaintiff Mirlande Joseph; and (q) in failing to take all measures reasonably calculated to avoid the injuries and damages suffered by the infant-Plaintiff Mitji Joseph.

- 51. In addition to the above acts and/or omissions, Dr. Wong failed to act and/or failed to comply with existing standards of medical and/or maternal care and treatment expected, required, and existing under the circumstances.
- 52. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, obstetrical and gynecological practice, all of which were a proximate cause of the injuries and damages sustained by the Infant-Plaintiff Mitji Joseph and the Plaintiffs, Mirlande Joseph and Waltas Joseph.
- 53. As a direct and proximate result of the negligence of Dr. Wong, his agents, servants, and employees and those persons acing under his direction and supervision, the Infant-Plaintiff Mitji Joseph was caused to sustain severe and permanent injuries, including but not limited to: Brain damage; Erb's Palsy,

cerebral palsy, left brachial plexus injury, persistent pulmonary hypertension; abnormal EEG studies; a diffuse Central Nervous System Dysfunction; bilateral Grade I cerebral hemorrhage; diffuse cerebral edema secondary to hypoxic-ischemic injury; bilateral encephalo-hematoma; severe panplexopathy affecting the brachial plexus; minimal flexion and extension movements of her left fingers and limited wrist extension and flexion of the left wrist; hypoxic ischemic encephalopathy; palsy at the level of the shoulder and elbow of the left extremity; areflexia of the left arm; severe pain, prolonged suffering; inability to perform and to learn many activities of daily living; developmental delays; cognitive difficulties, weakness, inability to utilize the left upper extremity and other serious and diverse personal injuries, all of the above which are permanent in nature or will have permanent or will have permanent residual effects.

- 54. As a further result of the negligence of Dr. Wong, the Plaintiffs Mirlande Joseph and Waltas Joseph were obliged to expand various and diverse sums of money for nursing, medicine, medical attention, medical treatment, surgical treatment, physical therapy, and other therapeutic modalities in an effort to treat the Infant-Plaintiff Mitji Joseph, of the injuries sustained as the result of the negligence of Dr. Wong and the Infant-Plaintiff Mitji Joseph will be obliged to spend further monies for same for an indefinite period of time in the future, all to their great detriment and loss.
- 55. As a further result of the negligence of Dr. Wong, the Infant-Plaintiff Mitji Joseph, has suffered and will suffer into the future economic losses, vocational losses, and loss of earning capacity and power, all to her great detriment and loss.
- 56. As a further result of the negligence of Dr. Wong, the Plaintiff Mitji Joseph, has suffered and will suffer future and continued pain, emotional injury, loss of enjoyment of life, consequential damages, vocational losses, loss of earnings, loss of earning capacity and power, mental and physical pain and suffering, and disability from many activities of daily living.

- 57. As a result of the negligence of Dr. Wong, M.D. the Infant-Plaintiff Mitji Joseph, has suffered permanent injuries especially with regard to the hypoxic-ischemic encephalopathy and left upper extremity injury.
- 58. All of the aforesaid occurred by virtue of the negligence of Dr. Wong and the Co-Defendants, and was in no manner whatsoever caused by any act, or failure to act on the part of the Infant-Plaintiff Mitji Joseph or the Plaintiffs Mirlande Joseph or Waltas Joseph.

WHEREFORE, the Plaintiffs pray judgment and damages of the Defendant Geoffrey P. Wong, M.D., in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT V

Mirlande Joseph, Individually, v. Geoffrey P. Wong, M.D. (Professional negligence and Loss of Consortium)

- 59. The Plaintiff Mirlande Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Geoffrey P. Wong, M.D. the allegations hereinabove set forth in the Introduction, Paragraphs One (1) through Fifty-Eight (58).
- 60. The Plaintiff Mirlande Joseph is and was at all relative times herein, the mother of the Infant-Plaintiff Mitji Joseph.
- 61. During the course of medical, maternal and obstetrical care, Dr. Wong acted in a careless and negligent fashion, and committed acts of malpractice(as set forth

above) and failed to act in accordance and compliance with existing standards of treatment required, expected or existing under the circumstances.

- 62. These acts, as set forth previously, constitute acts of negligence, professional malpractice and were deviations from good and accepted medical and surgical practice, all of which were a proximate cause of the injuries and damages sustained by the Plaintiffs
- As a direct and proximate result of the negligence of Dr. Wong, his agents, servants, and employees and those persons under his direction and supervision, the Plaintiff Mirlande Joseph was caused to sustain damages, including but not limited to, loss of services, society, companionship, loss of consortium, mental anguish, mental, and economic losses as they relate to the medical care and treatment rendered to the Infant-Plaintiff Mitji Joseph.
- 64. As a further result of the negligence of Dr. Wong, the Plaintiff Miriande Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical treatment, surgical treatment, physical therapy and other therapeutic modalities in an effort to cure her daughter of the injuries sustained and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.
- 65. As a further result of the negligence of Dr. Wong, M.D., the Plaintiff Mirlande Joseph suffered pain, emotional pain, suffering, distress and injury due to Dr. Wong's failures to act in accordance with medical care and treatment with regard to the obstetrical care, maternal care, labor and delivery of the Infant-Plaintiff Mitji Joseph, all to her great detriment and loss.

WHEREFORE, the Plaintiff Mirlande Joseph prays judgment and damages of the Defendant Geoffrey P. Wong, M.D.in an amount to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT VI

Waltas Joseph v. Geoffrey P. Wong, M.D.

- 66. The Plaintiff Waltas Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Geoffrey P. Wong, M.D. all of the allegations hereinabove set forth in Paragraphs One (1) through Sixty-five (65).
- 67. The Plaintiff Waltas Joseph, is and was at all relevant times the husband of Co-Plaintiff Mirlande Joseph and the father of the Infant-Plaintiff Mitji Joseph.
- 68. During the course of medical care, services and treatment to the Plaintiffs, Mitji Joseph and Mirlande Joseph, Dr. Wong was careless, negligent, reckless, and committed acts of malpractice, as set forth above with regard to the obstetrical, maternal, labor and delivery care rendered to Mirlande Joseph and the Infant-Plaintiff Mitji Joseph on or before May 19, 2007.
- 69. Dr. Wong failed to act and/or failed to comply with existing standards of medical and/or surgical care and treatment expected, required, and existing under the circumstances.
- 70. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, maternal and obstetrical practices, all of which were a proximate cause of the damages sustained by the Plaintiff Waltas Joseph, arising from the injuries sustained by co-Plaintiffs Mirlande Joseph and Mitji Joseph.
- 71. As a direct and proximate result of negligence of Dr. Wong, his agents, servants, employees, and those persons under his direction and supervision and control.

the Plaintiff Waltas Joseph was caused to sustain damages, including but not limited to: loss of services, society, companionships, consortium, mental anguish, mental suffering and economic losses.

- 72. As a further result of the negligence of Dr. Wong, the Plaintiff Waltas Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical care, medical treatment, surgical treatment, and other therapeutic modalities in an effort to cure his wife and his daughter of the injuries sustained as a result of the negligence of Dr. Wong and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.
- 73. As a further result of the negligence of Dr. Wong, the Plaintiff Waltas Joseph has suffered and will continue to suffer into the future an economic loss all to his great detriment and loss.

WHEREFORE, the Plaintiff Waitas Joseph prays judgment and damages of Dr. Wong, in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT VII

Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitii Joseph v. Steven J. Ralston, M.D. (Professional Negligence)

74. The Plaintiffs Mirlande Joseph and Waltas Joseph, as Parents and Next Fried of Mitji Joseph, hereby repeat, reallege, and incorporate herein by reference against Defendant Steven J. Ralston, M.D. ("Dr. Ralston") all of the allegations hereinabove set forth in Paragraphs One (1) through Seventy-three (73).

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- 75. Dr. Ralston is and has been a practicing physician, holding herself out to members of the general public as a specialist in Obstetrics and Gynecology, and further held himself out to members of the general public and more specifically, the Plaintiffs, Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitji Joseph, as a physician who was qualified and competent to advise, to treat, to diagnose, to examine, to provide obstetrical services and gynecological services and to administer to his patients concerning their medical, obstetric and maternal medical needs with all necessary care, treatment, and precautions.
- 76. Dr. Ralston held himself out to possess a superior knowledge in the field of Obstetrics and Gynecology in his relationship with his patients, more specifically, the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph who maintain an Inferior position in such regard.
- 77. Dr. Ralston maintained a professional relationship with the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, and treated and advised the Plaintiffs with regard to their maternal, obstetrical and fetal medicine needs, care, diagnosis, and treatment.
- 78. On or about May 19, 2007 and prior thereto, the Plaintiff Mirlande Joseph sought medical and maternal care, services, treatment, attention from Dr. Ralston related to her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 79. Prior to and Including May 19, 2007, Dr. Ralston continuously provided and rendered medical services, advice, care, and treatment to the Plaintiff Mirlande Joseph, during the course of her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 80. During the course of medical care and treatment, the Plaintiff Mirlande Joseph was examined, followed, treated, attended, and/or cared for by Dr. Ralston on a regular and continuous basis.

- 81. The Plaintiff Mirlande Joseph and Plaintiff Waltas Joseph agreed to pay, and did, in fact, through all available sources, pay reasonable sums for medical care, treatment, and services rendered by all Defendants, including Dr. Ralston.
- 82. During all relevant times hereto, Dr. Ralston was advised, informed of, and did have and possess knowledge of the Plaintiff Mirlande Joseph's medical history and the maternal care and treatment rendered to Mirlande Joseph related to her pregnancy, labor and delivery with the Infant-Plaintiff Mitji Joseph, including all risk factors associated with said pregnancy, labor, progression of labor, onset of labor and delivery.
- 83. During the course of medical and maternal care, services, and treatment to the Plaintiff Mirlande Joseph and her pregnancy and delivery of the Infant-Plaintiff Mitji Joseph, Dr. Raiston was careless, negligent, and committed acts of malpractice, including but not limited to: (a) in falling to properly attend to Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitti Joseph during the course of her pregnancy, labor and delivery; (b) in failing to order and to perform all necessary, proper, and indicated tests that concerned the progression of the delivery of the Infant-Plaintiff Mitji Joseph; (c) in causing, permitting, and allowing the Infant-Plaintiff Mitji Joseph to sustain and suffer fetal distress while in utero and during the course of delivery; (d) in failing to properly perform appropriate surgery, including a Caesarian section upon the Plaintiff Mirlande Joseph in order to deliver in a prompt and safe fashion the Infant-Plaintiff Mitji Joseph; (e) in failing to perform all tests which were available and appropriate in a timely fashion; (f) in failing to properly advise the Plaintiff Mirlande Joseph of the availability, risk, benefits, and hazards of alternative methods of delivery including Caesarian section; (g) in failing to diagnose, recognize, identify, prevent, treat, or otherwise to determine the presence of a fetal distress during the course of the delivery of the Infant-Plaintiff Mitji Joseph; (h) in failing to note of the presence of meconium staining and fetal distress during the course of the obstetrical care and treatment;

at the Tufts-New England Medical Center; (i) in failing to note the presence of late fetal heart decelerations during the course of fetal monitoring, thus causing, permitting and allowing the Infant-Plaintiff Mitji Joseph to suffer fetal distress, hypoxia, hypoxic-ischemic events, and anoxia during the course of maternal care and delivery; (j) in failing diagnosis the presence of macrosomia and/or shoulder dystocia, thus causing a brachial plexus injury to the left upper extremity in the Infant-Plaintiff Mitji Joseph; (k) in failing to take all precautions necessary to prevent the injuries suffered by the infant-Plaintiff Mitji Joseph, including proper treatment and care given the risks of pregnancy facing the Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, including hypoxia, an hypoxicischemic event, cerebral palsy, Erb's Palsy and brachial plexus injury (I) in failing to take all steps reasonably calculated to avoid the presence of fetal distress and left upper extremity injury to the Infant-Plaintiff Mitji Joseph; (m) in failing to act in accord with good and accepted medical, obstetrical and maternal practices expected, required, and existing under the circumstances, including proper fetal monitoring, proper assessment of macrosomy and proper following of the progression of labor; (n) in failing to take all steps to diagnosis the Plaintiff Mirlande Joseph's risk factors and the Infant-Plaintiff Mitji Joseph's true condition during the course of labor and delivery; (o) in failing to take all steps necessary during the progression of labor, to diagnosis the presence of fetal distress in the Infant-Plaintiff Mitji Joseph; (p) in failing to take all steps during the course of labor to properly monitor the Plaintiff Mirlande Joseph; and (q) in falling to take all measures reasonably calculated to avoid the injuries and damages suffered by the Infant-Plaintiff Mitji Joseph.

- 84. In addition to the above acts and/or omissions, Dr. Ralston failed to act and/or failed to comply with existing standards of medical and/or maternal care and treatment expected, required, and existing under the circumstances.
- 85. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, obstetrical

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and gynecological practice, all of which were a proximate cause of the injuries and damages sustained by the Infant-Plaintiff Mitji Joseph and the Plaintiffs, Mirlande Joseph and Waltas Joseph.

- 86. As a direct and proximate result of the negligence of Dr. Raiston, his agents, servants, and employees and those persons acing under his direction and supervision, the Infant-Plaintiff Mitji Joseph was caused to sustain severe and permanent injuries, including but not limited to: Brain damage; Erb's Palsy, cerebral palsy, left brachial plexus injury, persistent pulmonary hypertension; abnormal EEG studies; a diffuse Central Nervous System Dysfunction; bilateral Grade I cerebral hemorrhage; diffuse cerebral edema secondary to hypoxicischemic injury; bilateral encephalo-hematoma; severe panplexopathy affecting the brachlal plexus; minimal flexion and extension movements of her left fingers and limited wrist extension and flexion of the left wrist; hypoxic ischemic encephalopathy; palsy at the level of the shoulder and elbow of the left extremity; areflexia of the left arm; severe pain, prolonged suffering; inability to perform and to learn many activities of daily living; developmental delays; cognitive difficulties, weakness, inability to utilize the left upper extremity and other serious and diverse personal injuries, all of the above which are permanent in nature or will have permanent or will have permanent residual effects.
- As a further result of the negligence of Dr. Ratston, the Plaintiffs Mirlande Joseph and Waltas Joseph were obliged to expend various and diverse sums of money for nursing, medicine, medical attention, medical treatment, surgical treatment, physical therapy, and other therapeutic modalities in an effort to treat the Infant-Plaintiff Mitji Joseph, of the injuries sustained as the result of the negligence of Dr. Ralston and the Infant-Plaintiff Mitji Joseph will be obliged to spend further monies for same for an indefinite period of time in the future, all to their great detriment and loss.

- 88. As a further result of the negligence of Dr. Ralston, the Infant-Plaintiff Mitji Joseph has suffered and will suffer into the future economic losses, vocational losses, loss of earning capacity and loss of earning power, all to her great detriment and loss.
- 89. As a further result of the negligence of Dr. Ralston, the Plaintiff Mitji Joseph, has suffered and will suffer future and continued pain, emotional injury, loss of enjoyment of life, vocational losses, loss of earning capacity, loss of earnings, consequential damages, suffering, and disability from many activities of daily living.
- 90. As a result of the negligence of Dr. Ralston, M.D., the Infant-Plaintiff Mitji Joseph, has suffered permanent injuries especially with regard to the hypoxic-ischemic encephalopathy and left upper extremity injury.
- 91. All of the aforesaid occurred by virtue of the negligence of Dr. Ralston and the Co-Defendants, and was in no manner whatsoever caused by any act, or failure to act on the part of the Infant-Plaintiff Mitji Joseph or the Plaintiffs Mirlande Joseph or Waltas Joseph.

WHEREFORE, the Plaintiffs pray judgment and damages of the Defendant Steven J. Ralston, M.D., in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT VIII

Miriande Joseph, Individually, v. Steven J. Ralston, M.D. (Professional negligence and Loss of Consortium)

- 92. The Plaintiff Mirlande Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Steven J. Ralston, M.D. the allegations hereinabove set forth Paragraphs One (1) through Ninety-one (89).
- 93. The Plaintiff Mirlande Joseph is and was at all relative times, the mother of the Infant-Plaintiff Mitji Joseph.
- 94. During the course of medical, maternal and obstetrical care, Dr. Raiston acted in a careless and negligent fashion, and committed acts of malpractice(as set forth above) and failed to act in accordance and compiliance with existing standards of treatment required, expected or existing under the circumstances.
- 95. These acts, as set forth previously, constitute acts of negligence, professional malpractice and were deviations from good and accepted medical and surgical practice, all of which were a proximate cause of the injuries and damages sustained by the Plaintiffs.
- 96. As a direct and proximate result of the negligence of Dr. Ralston, his agents, servants, and employees and those persons under his direction and supervision, the Plaintiff Mirlande Joseph was caused to sustain damages, including but not limited to, loss of services, society, companionship, loss of consortium, mental anguish, mental, and economic losses as they relate to the medical care and treatment rendered to the Infant-Plaintiff Mitti Joseph.
- 97. As a further result of the negligence of Dr. Ralston, the Plaintiff Mirlande Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical treatment, surgical treatment, physical therapy and other therapeutic modalities in an effort to cure her daughter of the injuries sustained and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.

98. As a further result of the negligence of Dr. Ralston, M.D., the Plaintiff Mirlande Joseph suffered pain, emotional pain, suffering, distress and injury due to Dr. Ralston's failures to act in accordance with medical care and treatment with regard to the obstetrical care, maternal care, labor and delivery of the Infant-Plaintiff Mitji Joseph, all to her great detriment and loss.

WHEREFORE, the Plaintiff Mirlande Joseph prays judgment and damages of the Defendant Steven J. Ralston, M.D.in an amount to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT IX

Waltas Joseph v. Steven J. Raiston, M.D.

- 99. The Plaintiff Waltas Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Steven J. Ralston, M.D. all of the allegations hereinabove set forth in Paragraphs One (1) through Ninety-Eight (98).
- 100. The Plaintiff Waltas Joseph, is and was at all relevant times the husband of Co-Plaintiff Mirlande Joseph and the father of the Infant-Plaintiff Mitji Joseph.
- 101. During the course of medical care, services and treatment to the Plaintiffs, Mitji Joseph and Mirlande Joseph, Dr. Raiston was careless, negligent, reckless, and committed acts of malpractice, as set forth above with regard to the obstetrical, maternal, labor and delivery care rendered to Mirlande Joseph and the Infant-Plaintiff Mitji Joseph on or before May 19, 2007.
- 102. Dr. Ralston failed to act and/or failed to comply with existing standards of medical and/or surgical care and treatment expected, required, and existing under the circumstances.

- 103. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, maternal and obstetrical practices, all of which were a proximate cause of the damages sustained by the Plaintiff Waltas Joseph, arising from the injuries sustained by co-Plaintiffs Mirlande Joseph and Mitji Joseph.
- 104. As a direct and proximate result of negligence of Dr. Ralston, his agents, servants, employees, and those persons under her direction and supervision and control, the Plaintiff Waltas Joseph was caused to sustain damages, including but not limited to: loss of services, society, companionships, consortium, mental anguish, mental suffering and economic losses.
- 105. As a further result of the negligence of Dr. Ralston, the PlaIntiff Waltas Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical care, medical treatment, surgical treatment, and other therapeutic modalities in an effort to cure his wife and his daughter of the injuries sustained as a result of the negligence of Dr. Ralston and will be obliged to spend further monies for same for an indefinite period of time in the future, all to his great detriment and loss.
- 106. As a further result of the negligence of Dr. Ralston, the Plaintiff Waltas Joseph has suffered and will continue to suffer into the future an economic loss all to his great detriment and loss.

WHEREFORE, the Plaintiff Waltas Joseph prays judgment and damages of Dr. Ralston, in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.



COUNT X

Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitji Joseph v. Christina T. Thomas, M.D. (Professional Negligence)

- 107. The Plaintiffs Mirlande Joseph and Waltas Joseph, as Parents and Next Fried of Mitji Joseph, hereby repeat, reallege, and incorporate herein by reference against Defendant Christina T. Thomas, M.D. ("Dr. Thomas") all of the allegations hereinabove set forth in Paragraphs One (1) through One Hundred and Six (108).
- 108. The Defendant Christina T. Thomas, M.D., ("Dr. Thomas") is and has been a practicing physician, holding herself out to members of the general public as a specialist in Obstetrics and Gynecology, and further held herself out to members of the general public and more specifically, the Ptaintiffs, Mirtande Joseph and Waltas Joseph, as Parents and Next Friends of Mitji Joseph, as a physician who was qualified and competent to advise, to treat, to diagnose, to examine, to provide obstetrical services and gynecological services and to administer to her patients concerning their medical, obstetric and maternal medical needs with all necessary care, treatment, and precautions.
- 109. Dr. Thomas held herself to possess a superior knowledge in the field of Obstetrics and Gynecology in her relationship with her patients, more specifically, the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph who maintain an inferior position in such regard.
- 110. Dr. Thomas maintained a professional relationship with the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, and treated and advised the Plaintiffs with regard to their obstetrical and fetal medicine needs, care, diagnosis, and treatment.

- 111. On or about May 19, 2007 and prior thereto, the Plaintiff Mirlande Joseph sought medical and maternal care, services, treatment, attention from Dr. Thomas related to her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 112. Prior to and including May 19, 2007, Dr. Thomas continuously provided and rendered medical services, advice, care, and treatment to the Plaintiff Mirlande Joseph, during the course of her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 113. During the course of medical care and treatment, the Plaintiff Mirlande Joseph, was examined, followed, treated, attended, and/or cared for by Dr. Thomas on a regular and continuous basis.
- 114. The Plaintiff Mirlande Joseph and Plaintiff Waltas Joseph agreed to pay, and did, in fact, through all available sources, pay reasonable sums for medical care, treatment, and services rendered by all Defendants, including Dr. Thomas.
- 115. During all relevant times hereto, Dr. Thomas was advised, informed of, and did have and possess knowledge of the Plaintiff Mirlande Joseph's medical history and the maternal care and treatment rendered to Mirlande Joseph related to her pregnancy with the Infant-Plaintiff Mitji Joseph, including all risk factors associated with said pregnancy, labor, progression of labor, onset of labor and delivery.
- Plaintiff Mirlande Joseph and her pregnancy and delivery of the Infant-Plaintiff Mitji Joseph, Dr. Thomas was careless, negligent, and committed acts of malpractice, including but not limited to: (a) in failing to properly attend to Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph during the course of her pregnancy and delivery as she had agreed; (b) in failing to order and to perform all necessary, proper, and indicated tests that concerned the progression of the

delivery of the Infant-Plaintiff Mitji Joseph; (c) in causing, permitting, and allowing the Infant-Plaintiff Mitji Joseph to sustain and suffer fetal distress while in utero and during the course of delivery; (d) in failing to properly perform appropriate surgery, including a Caesarian section upon the Plaintiff Mirlande Joseph in order to deliver in a prompt and safe fashion the Infant-Plaintiff Mitji Joseph; (e) in failing to perform all tests which were available and appropriate in a timely fashion; (f) in failing to properly advise the Plaintiff Mirlande Joseph of the availability, risk, benefits, and hazards of alternative methods of delivery including Caesarian section; (g) in failing to diagnose, recognize, identify, prevent, treat, or otherwise to determine the presence of a fetal distress during the course of the delivery of the Infant-Plaintiff Mitji Joseph; (h) in failing to note of the presence of meconium staining during the course of the obstetrical care and treatment rendered by Defendant Christina T. Thomas, M.D. and other physicians at the Tufts-New England Medical Center; (i) in failing to note the presence of late fetal heart decelerations during the course of fetal monitoring, thus causing, permitting and allowing the Infant-Plaintiff Mitji Joseph to suffer fetal distress, hypoxia, hypoxic-ischemic events, and anoxia during the course of maternal care and delivery; (j) in failing diagnosis the presence of macrosomia and/or shoulder dystocia, thus causing a brachial plexus injury to the left upper extremity in the Infant-Plaintiff Mitji Joseph; (k) in failing to take all precautions necessary to prevent the injuries suffered by the Infant-Plaintiff Mitji Joseph, including proper treatment and care given the risks of pregnancy facing the Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, including hypoxia, an hypoxic-ischemic event, cerebral palsy, Erb's Palsy and brachial plexus injury (I) in failing to take all steps reasonably calculated to avoid the presence of fetal distress and left upper extremity injury to the Infant-Plaintiff Mitji Joseph; (m) in failing to act in accord with good and accepted medical, obstetrical and maternal practices expected, required, and existing under the circumstances, including proper fetal monitoring, proper assessment of macrosomy and proper following of the progression of labor; (n) in failing to take all steps to diagnosis the Plaintiff Mirlande Joseph's risk factors and the Infant-Plaintiff Mitji Joseph's true

condition during the course of labor and delivery; (o) in failing to take all steps necessary during the progression of labor, to diagnosis the presence of fetal distress in the Infant-Plaintiff Mitji Joseph; (p) in failing to take all steps during the course of labor to properly monitor the Plaintiff Mirlande Joseph; and (q) in failing to take all measures reasonably calculated to avoid the injuries and damages suffered by the Infant-Plaintiff Mitji Joseph.

- 117. In addition to the above acts and/or omissions, Dr. Thomas failed to act and/or failed to comply with existing standards of medical and/or maternal care and treatment expected, required, and existing under the circumstances.
- 118. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, obstetrical and maternal practice, all of which were a proximate cause of -the injuries and damages sustained by the Infant-Plaintiff Mitji Joseph and the Plaintiffs, Mirlande Joseph and Waltas Joseph.
- 119. As a direct and proximate result of the negligence of Dr. Thomas, her agents, servants, and employees and those persons acing under her direction and supervision, the Infant-Plaintiff Mitji Joseph was caused to sustain severe and permanent injuries, including but not limited to: Brain damage; Erb's Palsy, cerebral palsy, left brachial plexus injury, persistent pulmonary hypertension; abnormal EEG studies; a diffuse Central Nervous System Dysfunction; bilateral Grade I cerebral hemorrhage; diffuse cerebral edema secondary to hypoxic-ischemic injury; bilateral cephalohematoma; severe panplexopathy affecting the brachial plexus nervous system; minimal flexion and extension movements of her left fingers and limited wrist extension and flexion of the left wrist; hypoxic ischemic encephalopathy; palsy at the level of the shoulder and elbow of the left extremity; areflexia of the left arm; severe pain, prolonged suffering; inability to perform and to learn many activities of daily living; developmental delays; cognitive difficulties, weakness, inability to utilize the left upper extremity and

other serious and diverse personal injuries, all of the above which are permanent in nature or will have permanent or will have permanent residual effects.

- 120. As a further result of the negligence of Dr. Thomas, the Plaintiffs Mirlande
 Joseph and Waltas Joseph were obliged to expend various and diverse sums of
 money for nursing, medicine, medical attention, medical treatment, surgical
 treatment, physical therapy, and other therapeutic modalities in an effort to treat
 the Infant-Plaintiff Mitji Joseph, of the injuries sustained as the result of the
 negligence of Dr. Thomas and the Infant-Plaintiff Mitji Joseph will be obliged to
 spend further monies for same for an indefinite period of time in the future, all to
 their great detriment and loss.
- 121. As a further result of the negligence of Dr. Thomas, the Infant-Plaintiff Mitji Joseph has suffered and will suffer into the future economic losses, vocational losses, loss of earning capacity, and loss of earning power, all to her great detriment and loss.
- 122. As a further result of the negligence of Dr. Thomas, the Plaintiff Mitji Joseph, has suffered and will suffer future and continued pain, emotional injury, loss of enjoyment of life, consequential damages, loss of earning capacity, loss of earning power, vocational losses, mental and physical pain and suffering, and disability from many activities of daily living.
- 123. As a result of the negligence of Dr. Thomas, M.D., the Infant-Plaintiff Mitji Joseph, has suffered permanent injuries especially with regard to the hypoxicischemic encephalopathy and left upper extremity injury.
- 124. All of the aforesaid occurred by virtue of the negligence of Dr. Thomas and the Co-Defendants, and was in no manner whatsoever caused by any act, or failure to act on the part of the Infant-Plaintiff Mitji Joseph or the Plaintiffs Mirlande Joseph or Waltas Joseph.

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WHEREFORE, the Plaintiffs pray judgment and damages of the Defendant Christina T. Thomas, M.D., in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT XI

Mirlande Joseph, Individually, v. Christina T. Thomas, M.D. (Professional negligence and Loss of Consortium)

- 125. The Plaintiff Mirlande Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Christina T. Thomas, M.D. the allegations hereinabove set forth in the Introduction, Paragraphs One (1) through One Hundred and Twenty-Four (124).
- 126. The Plaintiff Mirlande Joseph is and was at all relative times herein, the mother of the Infant-Plaintiff Mitji Joseph.
- 127. During the course of medical, maternal and obstetrical care, Dr. Thomas acted in a careless and negligent fashion, and committed acts of malpractice(as set forth above) and failed to act in accordance and compliance with existing standards of treatment required, expected or existing under the circumstances.
- 128. These acts, as set forth previously, constitute acts of negligence, professional malpractice and were deviations from good and accepted medical and surgical practice, all of which were a proximate cause of the injuries and damages sustained by the Plaintiffs
- 129. As a direct and proximate result of the negligence of Dr. Thomas, her agents, servants, and employees and those persons under her direction and supervision,

the Plaintiff Mirlande Joseph was caused to sustain damages, including but not limited to, loss of services, society, companionship, loss of consortium, mental anguish, mental, and economic losses, vocational losses and losses in earning capacity as they relate to the medical care and treatment rendered to the Infant-Plaintiff Mitji Joseph.

- 130. As a further result of the negligence of Dr. Thomas, the Plaintiff Mirlande Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical treatment, surgical treatment, physical therapy and other therapeutic modalities in an effort to cure her daughter of the injuries sustained and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.
- 131. As a further result of the negligence of Dr. Thomas, M.D., the Plaintiff Mirlande Joseph suffered pain, emotional pain, suffering, distress and injury due to Dr. Thomas' failures to act in accordance with medical care and treatment with regard to the obstetrical care, maternal care, labor and delivery of the Infant-Plaintiff Mitji Joseph, all to her great detriment and loss.

WHEREFORE, the Plaintiff Mirlande Joseph prays judgment and damages of the Defendant Christina T. Thomas, M.D.in an amount to be determined at the trial of this action, plus interest and costs as provided by law.

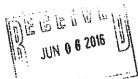
PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT XII

Waltas Joseph v. Christina T. Thomas, M.D.

132. The Plaintiff Waltas Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Christina T. Thomas, M.D. all of the allegations

- hereinabove set forth in Paragraphs One (1) through One Hundred and Thirty-one (131).
- 133. The Plaintiff Waltas Joseph is and was at all relevant times the husband of Co-Plaintiff Mirlande Joseph and the father of the Infant-Plaintiff Mitji Joseph.
- 134. During the course of medical care, services and treatment to the Plaintiffs, Mitji Joseph and Mirlande Joseph, Dr. Thomas was careless, negligent, reckless, and committed acts of malpractice, as set forth above with regard to the obstetrical, maternal, labor and delivery care rendered to Mirlande Joseph and the Infant-Plaintiff Mitji Joseph on or before May 19, 2007.
- 135. Dr. Thomas failed to act and/or failed to comply with existing standards of medical and/or surgical care and treatment expected, required, and existing under the circumstances.
- 136. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, maternal and obstetrical practices, all of which were a proximate cause of the damages sustained by the Plaintiff Waltas Joseph, arising from the injuries sustained by co-Plaintiffs Mirlande Joseph and Mitji Joseph.
- 137. As a direct and proximate result of negligence of Dr. Thomas, her agents, servants, employees, and those persons under her direction and supervision and control, the Plaintiff Waltas Joseph was caused to sustain damages, including but not limited to: loss of services, society, companionships, consortium, mental anguish, mental suffering and economic losses.
- 138. As a further result of the negligence of Dr. Thomas, the Plaintiff Waltas Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical care, medical treatment, surgical treatment, and other



therapeutic modalities in an effort to cure his wife and his daughter of the injuries sustained as a result of the negligence of Dr. Thomas and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.

139. As a further result of the negligence of Dr. Thomas, the Plaintiff Waltas Joseph has suffered and will continue to suffer into the future economic losses, all to his great detriment and loss.

WHEREFORE, the Plaintiff Waltas Joseph prays judgment and damages of Dr. Thomas, in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT XIII

Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitji Joseph v. Fave Justicia-linde, M.D. (Professional Negligence)

- 140. The Plaintiffs Mirlande Joseph and Waltas Joseph, as Parents and Next Fried of Mitti Joseph, hereby repeat, reallege, and Incorporate herein by reference against Defendant Faye Justicia-linde, M.D. ("Dr. Justicia-linde") all of the allegations hereinabove set forth in Paragraphs One (1) through One Hundred and Thirty-nine (139).
- 141. The Defendant Faye Justicia-linde, M.D., ("Dr. Justicia-linde") is and has been a practicing physician, holding herself out to members of the general public as a specialist in Obstetrics and Gynecology, and further held herself out to members of the general public and more specifically, the Plaintiffs, Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitji Joseph, as a physician who was qualified and competent to advise, to treat, to diagnose, to examine, to

provide obstetrical services and gynecological services and to administer to her patients concerning their medical, obstetric and maternal medical needs with all necessary care, treatment, and precautions.

- 142. Dr. Justicia-linde held herself to possess a superior knowledge in the field of Obstetrics and Gynecology in her relationship with her patients, more specifically, the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph who maintain an inferior position in such regard.
- 143. Dr. Justicia-linde maintained a professional relationship with the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, and treated and advised the Plaintiffs with regard to their obstetrical and fetal medicine needs, care, diagnosis, and treatment.
- 144. On or about May 19, 2007 and prior thereto, the Plaintiff Mirlande Joseph sought medical and maternal care, services, treatment, attention from Dr. Justicia-linde related to her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 145. Prior to and including May 19, 2007, Dr. Justicia-linde continuously provided and rendered medical services, advice, care, and treatment to the Plaintiff Mirlande Joseph, during the course of her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 146. During the course of medical care and treatment, the Plaintiff Mirlande Joseph, was examined, followed, treated, attended, and/or cared for by Dr. Justicia-linde on a regular and continuous basis.
- 147. The Plaintiff Mirlande Joseph and Plaintiff Waltas Joseph agreed to pay, and did, in fact, through all available sources, pay reasonable sums for medical care, treatment, and services rendered by all Defendants, including Dr. Justicia-linde.

- 148. During all relevant times hereto, Dr. Justicia-linde was advised, informed of, and did have and possess knowledge of the Plaintiff Miriande Joseph's medical history and the maternal care and treatment rendered to Miriande Joseph related to her pregnancy with the Infant-Plaintiff Mitji Joseph, including all risk factors associated with said pregnancy, labor, progression of labor, onset of labor and delivery.
- 149. During the course of medical and maternal care, services, and treatment to the Plaintiff Mirlande Joseph and her pregnancy and delivery of the Infant-Plaintiff Mitji Joseph, Dr. Justicia-linde was careless, negligent, and committed acts of malpractice, including but not limited to: (a) in falling to properly attend to Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph during the course of her pregnancy and delivery as she had agreed; (b) in failing to order and to perform all necessary, proper, and indicated tests that concerned the progression of the delivery of the Infant-Plaintiff Mitji Joseph; (c) in causing, permitting, and allowing the Infant-Plaintiff Mitji Joseph to sustain and suffer fetal distress while in utero and during the course of delivery; (d) in failing to properly perform appropriate surgery, including a Caesarian section upon the Plaintiff Mirlande Joseph in order to deliver in a prompt and safe fashion the Infant-Plaintiff Mitji Joseph; (e) in failing to perform all tests which were available and appropriate in a timely fashion; (f) in failing to properly advise the Plaintiff Mirlande Joseph of the availability, risk, benefits, and hazards of alternative methods of delivery including Caesarian section; (g) in failing to diagnose, recognize, identify, prevent, treat, or otherwise to determine the presence of a fetal distress during the course of the delivery of the Infant-Plaintiff Mitji Joseph; (h) in failing to note of the presence of meconium staining during the course of the obstetrical care and treatment rendered by Defendant Faye Justicia-linde, M.D. and other physicians at the Tufts-New England Medical Center; (i) in falling to note the presence of late fetal heart decelerations during the course of fetal monitoring, thus causing, permitting and allowing the Infant-Plaintiff Mitji Joseph to suffer fetal distress, hypoxia, hypoxic-ischemic events, and anoxia during the course of

maternal care and delivery; (j) in failing diagnosis the presence of macrosomia and/or shoulder dystocia, thus causing a brachial plexus injury to the left upper extremity in the Infant-Plaintiff Mitti Joseph; (k) in failing to take all precautions necessary to prevent the injuries suffered by the Infant-Plaintiff Mitji Joseph, including proper treatment and care given the risks of pregnancy facing the Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, including hypoxia, an hypoxic-ischemic event, cerebral palsy, Erb's Palsy and brachial plexus injury (I) in failing to take all steps reasonably calculated to avoid the presence of fetal distress and left upper extremity injury to the Infant-Plaintiff Mitji Joseph; (m) in failing to act in accord with good and accepted medical, obstetrical and maternal practices expected, required, and existing under the circumstances, including proper fetal monitoring, proper assessment of macrosomy and proper following of the progression of labor; (n) in failing to take all steps to diagnosis the Plaintiff Mirlande Joseph's risk factors and the Infant-Plaintiff Mitji Joseph's true condition during the course of labor and delivery; (o) in failing to take all steps necessary during the progression of labor, to diagnosis the presence of fetaldistress in the Infant-Plaintiff Mitji Joseph; (p) in failing to take all steps during the course of labor to properly monitor the Plaintiff Mirlande Joseph; and (g) in failing to take all measures reasonably calculated to avoid the injuries and damages suffered by the Infant-Plaintiff Mitji Joseph.

- 150. In addition to the above acts and/or omissions, Dr. Justicia-linde failed to act and/or failed to comply with existing standards of medical and/or maternal care and treatment expected, required, and existing under the circumstances.
- 151. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, obstetrical and maternal practice, all of which were a proximate cause of -the injuries and damages sustained by the Infant-Plaintiff Mitji Joseph and the Plaintiffs, Midande Joseph and Waltas Joseph.

- 152. As a direct and proximate result of the negligence of Dr. Justicia-linde, her agents, servants, and employees and those persons acing under her direction and supervision, the Infant-Plaintiff Mitji Joseph was caused to sustain severe and permanent injuries, including but not limited to: Brain damage; Erb's Palsy, cerebral palsy, left brachial plexus injury, persistent pulmonary hypertension; abnormal EEG studies; a diffuse Central Nervous System Dysfunction; bilateral Grade I cerebral hemorrhage; diffuse cerebral edema secondary to hypoxicischemic injury; bilateral cephalo-hematoma; severe panplexopathy affecting the brachial plexus nervous system; minimal flexion and extension movements of her left fingers and limited wrist extension and flexion of the left wrist; hypoxic ischemic encephalopathy; palsy at the level of the shoulder and elbow of the left extremity; areflexia of the left arm; severe pain, prolonged suffering; inability to perform and to learn many activities of daily living; developmental delays; cognitive difficulties, weakness, inability to utilize the left upper extremity and other serious and diverse personal injuries, all of the above which are permanent in nature or will have permanent or will have permanent residual effects.
- 153. As a further result of the negligence of Dr. Justicia-linde, the Plaintiffs Mirlande Joseph and Waltas Joseph were obliged to expend various and diverse sums of money for nursing, medicine, medical attention, medical treatment, surgical treatment, physical therapy, and other therapeutic modalities in an effort to treat the Infant-Plaintiff Mitji Joseph, of the injuries sustained as the result of the negligence of Dr. Justicia-linde and the Infant-Plaintiff Mitji Joseph will be obliged to spend further monles for same for an Indefinite period of time in the future, all to their great detriment and loss.
- 154. As a further result of the negligence of Dr. Justicia-linde, the Infant-Plaintiff Mitji Joseph has suffered and will suffer into the future economic losses, vocational losses, loss of earning capacity, and loss of earning power, all to her great detriment and loss.

- 155. As a further result of the negligence of Dr. Justicia-linde, the Plaintiff Mitji Joseph, has suffered and will suffer future and continued pain, emotional injury, loss of enjoyment of life, consequential damages, loss of earning capacity, loss of earning power, vocational losses, mental and physical pain and suffering, and disability from many activities of daily living.
- 156. As a result of the negligence of Dr. Justicia-linde, M.D., the Infant-Plaintiff Mitji Joseph, has suffered permanent injuries especially with regard to the hypoxicischemic ancephalopathy and left upper extremity injury.
- 157. All of the aforesaid occurred by virtue of the negligence of Dr. Justicia-linde and the Co-Defendants, and was in no manner whatsoever caused by any act, or failure to act on the part of the Infant-Plaintiff Mitji Joseph or the Plaintiffs Mirlande Joseph or Waltas Joseph.

WHEREFORE, the Plaintiffs pray judgment and damages of the Defendant Faye Justicia-linde, M.D., in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

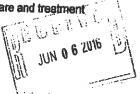
PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT XIV

Mirlande Joseph, Individually, v. Faye Justicia-linde, M.D. (Professional negligence and Loss of Consortium)

158. The Plaintiff Mirlande Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Faye Justicia-linde, M.D. the allegations hereinabove set forth in the Introduction, Paragraphs One (1) through One Hundred and Fifty-seven (157).

- 159. The Plaintiff Mirlande Joseph is and was at all relative times herein, the mother of the Infant-Plaintiff Mitji Joseph.
- 160. During the course of medical, maternal and obstetrical care, Dr. Justicia-linde acted in a careless and negligent fashion, and committed acts of malpractice(as set forth above) and failed to act in accordance and compliance with existing standards of treatment required, expected or existing under the circumstances.
- 161. These acts, as set forth previously, constitute acts of negligence, professional malpractice and were deviations from good and accepted medical and surgical practice, all of which were a proximate cause of the injuries and damages sustained by the Plaintiffs
- 162. As a direct and proximate result of the negligence of Dr. Justicia-linde, her agents, servants, and employees and those persons under her direction and supervision, the Plaintiff Mirlande Joseph was caused to sustain damages, including but not limited to, loss of services, society, companionship, loss of consortium, mental anguish, mental, and economic losses, vocational losses and losses in earning capacity as they relate to the medical care and treatment rendered to the Infant-Plaintiff Mittil Joseph.
- 163. As a further result of the negligence of Dr. Justicia-linde, the Plaintiff Mirlande Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical treatment, surgical treatment, physical therapy and other therapeutic modalities in an effort to cure her daughter of the injuries sustained and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.
- 164. As a further result of the negligence of Dr. Justicia-linde, M.D., the Plaintiff Mirlande Joseph suffered pain, emotional pain, suffering, distress and injury due to Dr. Justicia-linde' failures to act in accordance with medical care and treatment.



with regard to the obstetrical care, maternal care, labor and delivery of the Infant-Plaintiff Mitji Joseph, all to her great detriment and loss.

WHEREFORE, the Plaintiff Mirlande Joseph prays judgment and damages of the Defendant Faye Justicia-linde, M.D.in an amount to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT XV

Waltas Joseph v. Faye Justicla-linde, M.D.

- 165. The Plaintiff Waltas Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Faye Justicia-linde, M.D. all of the allegations hereinabove set forth in Paragraphs One (1) through One Hundred and Sixty-four (164).
- 166. The Plaintiff Waltas Joseph is and was at all relevant times the husband of Co-Plaintiff Mirlande Joseph and the father of the Infant-Plaintiff Mitji Joseph.
- 167. During the course of medical care, services and treatment to the Plaintiffs, Mitji Joseph and Mirlande Joseph, Dr. Justicia-linde was careless, negligent, reckless, and committed acts of malpractice, as set forth above with regard to the obstetrical, maternal, labor and delivery care rendered to Mirlande Joseph and the Infant-Plaintiff Mitji Joseph on or before May 19, 2007.
- 168. Dr. Justicia-linde failed to act and/or failed to comply with existing standards of medical and/or surgical care and treatment expected, required, and existing under the circumstances.

- 169. Each and all of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, maternal and obstetrical practices, all of which were a proximate cause of the damages sustained by the Plaintiff Waltas Joseph, arising from the injuries sustained by co-Plaintiffs Mirlande Joseph and Mitji Joseph.
- 170. As a direct and proximate result of negligence of Dr. Justicia-linde, her agents, servants, employees, and those persons under her direction and supervision and control, the Plaintiff Waltas Joseph was caused to sustain damages, including but not limited to: loss of services, society, companionship, consortium, mental anguish, mental suffering and economic losses.
- 171. As a further result of the negligence of Dr. Justicia-linde, the Plaintiff Waltas Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical care, medical treatment, surgical treatment, and other therapeutic modalities in an effort to cure his wife and his daughter of the injuries sustained as a result of the negligence of Dr. Justicia-linde and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.
- 172. As a further result of the negligence of Dr. Justicia-linde, the Plaintiff Waltas Joseph has suffered and will continue to suffer into the future economic losses, all to his great detriment and loss.

WHEREFORE, the Plaintiff Waltas Joseph prays judgment and damages of Dr. Justicia-linde, in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT XVI

Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitii Joseph v. Tufts-New England Medical Center (Professional Negligence)

- 173. The Plaintiffs Mirlande Joseph and Waltas Joseph, as Parents and Next Fried of Mitji Joseph, hereby repeat, reallege, and incorporate herein by reference against Defendant Tufts-New England Medical Center ("New England Medical Center") all of the allegations hereinabove set forth in Paragraphs One (1) through One Hundred and Seventy-two (172).
- 174. New England Medical Center is and has been a health care facility, hospital and medical center, holding itself out to members of the general public as a specialist in Obstetrics and Gynecology through its Department of Obstetrics, and further held itself out to members of the general public and more specifically, the Plaintiffs, Mirlande Joseph and Waltas Joseph, as Parents and Next Friends of Mitji Joseph, as staffed with physicians, nurses and health care providers who were qualified and competent to advise, to treat, to diagnose, to examine, to provide obstetrical services and gynecological services and to administer to patients concerning their medical, obstetric and maternal medical needs with all necessary care, treatment, and precautions.
- 175. New England Medical Center held out its agents, servants, physician, nurses and employees to possess a superior knowledge in the field of Obstetrics and Gynecology in its relationship with its patients, more specifically, the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph who maintain an inferior position in such regard.
- 176. New England Medical Center, its agents, servants, physicians, residents, nurses and employees, maintained a professional relationship with the Plaintiffs, Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, and treated and advised the

Plaintiffs with regard to their maternal, obstetrical and fetal medicine needs, care, diagnosis, and treatment.

- 177. On or about May 19, 2007 and prior thereto, the Plaintiff Mirlande Joseph sought medical and maternal care, services, treatment, attention from New England Medical Center, its agents, servants and employees, related to her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 178. Prior and subsequent to May 19, 2007, New England Medical Center, its agents, servants, physicians, residents, nurses and employees, continuously provided and rendered medical services, advice, care, and treatment to the Plaintiff Mirlande Joseph, during the course of her pregnancy, labor and delivery of the Infant-Plaintiff Mitji Joseph.
- 179. During the course of medical care and treatment, the Plaintiff Mirlande Joseph was examined, followed, treated, attended, and/or cared for by New England Medical Center, its agents, servants and employees, on a regular and continuous basis.
- 180. The Plaintiff Mirlande Joseph and Plaintiff Waltas Joseph agreed to pay, and did, in fact, through all available sources, pay reasonable sums for medical care, treatment, and services rendered by all Defendants, including New England Medical Center, its agents, servants and employees,.
- 181. During all relevant times hereto, New England Medical Center, its agents, servants and employees, was advised, informed of, and did have and possess knowledge of the Plaintiff Mirlande Joseph's medical history and the maternal care and treatment rendered to Mirlande Joseph related to her pregnancy, labor and delivery with the Infant-Plaintiff Mitji Joseph, including all risk factors associated with said pregnancy, labor, progression of labor, onset of labor and delivery.

182. During the course of medical and maternal care, services, and treatment to the Plaintiff Mirlande Joseph and her pregnancy and delivery of the Infant-Plaintiff Mitji Joseph, New England Medical Center, its agents, servants, physicians nurses and employees, were careless, negligent, and committed acts of malpractice, including but not limited to: (a) in failing to properly attend to Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph during the course of her pregnancy, labor and delivery; (b) in failing to order and to perform all necessary, proper, and indicated tests that concerned the progression of the delivery of the Infant-Plaintiff Mitji Joseph; (c) in causing, permitting, and allowing the Infant-Plaintiff Mitji Joseph to sustain and suffer fetal distress while in utero and during the course of delivery; (d) in failing to properly perform appropriate surgery, including a Caesarian section upon the Plaintiff Mirlande Joseph in order to deliver in a prompt and safe fashion the Infant-Plaintiff Mitji Joseph; (e) in failing to perform all tests which were available and appropriate in a timely fashion; (f) in failing to properly advise the Plaintiff Mirlande Joseph of the availability, risk. benefits, and hazards of alternative methods of delivery including Caesarian section; (g) in failing to diagnose, recognize, identify, prevent, treat, or otherwise to determine the presence of a fetal distress during the course of the delivery of the Infant-Plaintiff Mitji Joseph; (h) in failing to note of the presence of meconium staining and fetal distress during the course of the obstetrical care and treatment ;at the Tufts-New England Medical Center; (i) in failing to note the presence of late fetal heart decelerations during the course of fetal monitoring, thus causing, permitting and allowing the Infant-Plaintiff Mitji Joseph to suffer fetal distress. hypoxia, hypoxic-ischemic events, and anoxia during the course of maternal care and delivery; (j) in failing diagnosis the presence of macrosomia and/or shoulder dystocia, thus causing a brachial plexus injury to the left upper extremity in the Infant-Plaintiff Mitji Joseph; (k) in falling to take all precautions necessary to prevent the injuries suffered by the Infant-Plaintiff Mitji Joseph, including proper treatment and care given the risks of pregnancy facing the Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph, including hypoxia, an hypoxicischemic event, cerebral palsy, Erb's Palsy and brachial plexus injury (I) in failing to take all steps reasonably calculated to avoid the presence of fetal distress and left upper extremity injury to the Infant-Plaintiff Mitji Joseph; (m) in failing to act in accord with good and accepted medical, obstetrical and maternal practices expected, required, and existing under the circumstances, including proper fetal monitoring, proper assessment of macrosomy and proper following of the progression of labor; (n) in failing to take all steps to diagnosis the Plaintiff Mirlande Joseph's risk factors and the Infant-Plaintiff Mitji Joseph's true condition during the course of labor and delivery; (o) in failing to take all steps necessary during the progression of labor, to diagnosis the presence of fetal distress in the Infant-Plaintiff Mitji Joseph; (p) in failing to take all steps during the course of labor to properly monitor the Plaintiff Mirlande Joseph; and (q) in failing to take all measures reasonably calculated to avoid the injuries and damages suffered by the Infant-Plaintiff Mitji Joseph.

- 183. In addition to the above acts and/or omissions, New England Medical Center, its agents, servants, physicians, nurses and employees, failed to act and/or failed to comply with existing standards of medical and/or obstetrical/maternal care and treatment expected, required, and existing under the circumstances.
- 184. Each of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, obstetrical and gynecological practice, all of which were a proximate cause of the injuries and damages sustained by the Infant-Plaintiff Mitji Joseph and the Plaintiffs, Mirlande Joseph and Waltas Joseph.
- 185. As a direct and proximate result of the negligence of New England Medical Center, its agents, servants, physicians, nurses, employees and those persons acing under its direction and supervision, the Infant-Plaintiff Mitji Joseph was caused to sustain severe and permanent injuries, including but not limited to: Brain damage; Erb's Palsy, cerebral palsy, left brachial plexus injury, persistent

pulmonary hypertension; abnormal EEG studies; a diffuse Central Nervous System Dysfunction; bilateral Grade I cerebral hernorrhage; diffuse cerebral edema secondary to hypoxic-ischemic injury; bilateral encephalo-hernatoma; severe panplexopathy affecting the brachial plexus; minimal flexion and extension movements of her left fingers and limited wrist extension and flexion of the left wrist; hypoxic ischemic encephalopathy; palsy at the level of the shoulder and elbow of the left extremity; areflexia of the left arm; severe pain, prolonged suffering; inability to perform and to learn many activities of daily living; developmental delays; cognitive difficulties, weakness, inability to utilize the left upper extremity and other serious and diverse personal injuries, all of the above which are permanent in nature or will have permanent or will have permanent residual effects.

- 186. As a further result of the negligence of New England Medical Center, its agents, servants and employees, the Plaintiffs Mirlande Joseph and Waltas Joseph were obliged to expend various and diverse sums of money for nursing, medicine, medical attention, medical treatment, surgical treatment, physical therapy, and other therapeutic modalities in an effort to treat the Infant-Plaintiff Mitji Joseph, of the injuries sustained as the result of the negligence of New England Medical Center, its agents, servants and employees, and the Infant-Plaintiff Mitji Joseph will be obliged to spend further monies for same for an indefinite period of time in the future, all to their great detriment and loss.
- 187. As a further result of the negligence of New England Medical Center, its agents, servents and employees,, the Infant-Plaintiff Mitji Joseph has suffered and will suffer into the future economic losses, losses of earning capacity, vocational losses, loss of earning power, all to her great detriment and loss.
- 188. As a further result of the negligence of New England Medical Center, its agents, servants and employees,, the Plaintiff Mitji Joseph has suffered and will suffer future and continued pain, emotional injury, loss of enjoyment of life,

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consequential damages, vocational losses, loss of earning capacity and power, mental and physical pain and suffering, and disability from many activities of daily living.

- 189. As a result of the negligence of New England Medical Center, its agents, servants and employees, the Infant-Plaintiff Mitji Joseph, has suffered permanent injuries, especially with regard to the hypoxic-ischemic encephalopathy and left upper extremity injury.
- 190. All of the aforesald occurred by virtue of the negligence of New England Medical Center, its agents, servants and employees, and the Co-Defendants, and was in no manner whatsoever caused by any act, or failure to act on the part of the Infant-Plaintiff Mitji Joseph or the Plaintiffs Mirlande Joseph or Waltas Joseph.

WHEREFORE, the Plaintiffs pray judgment and damages of the Defendant Tufts-New England Medical Center, in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT XVIJ

Mirlande Joseph, Individually, v. Tufts-New England Medical Center (Professional negligence and Loss of Consortium)

- 191. The Plaintiff Mirlande Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Tufts-New England Medical Center the allegations hereinabove set forth Paragraphs One (1) through One Hundred and Ninety (190).
- 192. The Plaintiff Mirlande Joseph is and was at all relative times, the mother of the Infant-Plaintiff Mitji Joseph.

- 193. During the course of medical, maternal, fetal and obstetrical care, New England Medical Center, its agents, servants and employees, acted in a careless and negligent fashion, and committed acts of malpractice(as set forth above) and failed to act in accordance and compliance with existing standards of treatment required, expected or existing under the circumstances.
- 194. These acts, as set forth previously, constitute acts of negligence, professional malpractice and were deviations from good and accepted medical and surgical practice, all of which were a proximate cause of the injuries and damages sustained by the Plaintiffs.
- 195. As a direct and proximate result of the negligence of New England Medical Center, its agents, servants, physicians, nurses, employees, and those persons under its direction and supervision, the Plaintiff Mirlande Joseph was caused to sustain damages, including but not limited to, loss of services, society, companionship, loss of consortium, mental anguish, mental, and economic losses as they relate to the medical care and treatment rendered to the infant-Plaintiff Mitji Joseph and herself.
- 196. As a further result of the negligence of New England Medical Center, its agents, servants and employees, the Plaintiff Mirlande Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical treatment, surgical treatment, physical therapy and other therapeutic modalities in an effort to cure her daughter and herself of the injuries sustained and will be obliged to spend further monies for same for an indefinite period of time in the future, all to her great detriment and loss.
- 197. As a further result of the negligence of New England Medical Center, its agents, servants and employees,, M.D., the Plaintiff Mirlande Joseph suffered pain, emotional pain, suffering, distress and injury due to New England Medical

Center, its agents, physicians, nurses, servants and employees' failures to act in accordance with good and accepted standards of medical care and treatment with regard to the obstetrical care, maternal care, labor and delivery of the Infant-Plaintiff Mitji Joseph, all to her great detriment and loss.

WHEREFORE, the Plaintiff Mirlande Joseph prays judgment and damages of the Defendant Tufts-New England Medical Center in an amount to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

COUNT XVIII

Waltas Joseph v. Tufts-New England Medical Center

- 198. The Plaintiff Waltas Joseph, hereby repeats, realleges and incorporates herein by reference against Defendant Tufts-New England Medical Center all of the allegations hereinabove set forth in Paragraphs One (1) through One Hundred and Ninety-seven (197).
- 199. The Plaintiff Waltas Joseph is and was at all relevant times the husband of Co-Plaintiff Mirlande Joseph and the father of the Infant-Plaintiff Mitji Joseph.
- 200. During the course of medical care, services and treatment to the Plaintiffs Mitji Joseph and Mirlande Joseph, New England Medical Center, its agents, servants, physicians, nurses and employees, were careless, negligent, reckless, and committed acts of malpractice, as set forth above with regard to the obstetrical, maternal, labor and delivery care rendered to Plaintiff Mirlande Joseph and the Infant-Plaintiff Mitji Joseph on or before May 19, 2007.
- 201. New England Medical Center, its agents, physicians, nurses, servants and employees, failed to act and/or failed to comply with existing standards of

- medical and/or obstetrical care and treatment expected, required, and existing under the circumstances.
- 202. Each of the foregoing acts constitutes negligence, professional malpractice, and were deviations from good and accepted medical, maternal and obstetrical practices, all of which were a proximate cause of the damages sustained by the Plaintiff Waltas Joseph, arising from the injuries sustained by co-Plaintiffs Mirlande Joseph and Mitji Joseph.
- 203. As a direct and proximate result of negligence of New England Medical Center, its agents, servants and employees, the Plaintiff Waltas Joseph was caused to sustain damages, including but not limited to: loss of services, society, companionships, consortium, mental anguish, mental suffering and economic losses.
- 204. As a further result of the negligence of New England Medical Center, its agents, servants and employees, the Plaintiff Waltas Joseph was obliged to expend various and diverse sums of money for nursing, medical attention, medical care, medical treatment, surgical treatment, and other therapeutic modalities in an effort to cure his wife and his daughter of the injuries sustained as a result of the negligence of New England Medical Center, its agents, servants and employees, and will be obliged to spend further monies for same for an indefinite period of time in the future, all to his great detriment and loss.
- 205. As a further result of the negligence of New England Medical Center, its agents, servants and employees, the Plaintiff Waltas Joseph has suffered and will continue to suffer into the future an economic loss all to his great detriment and loss.

WHEREFORE, the Plaintiff Waltas Joseph prays judgment and damages of New England Medical Center, its agents, servants and employees, in a sum to be determined at the trial of this action, plus interest and costs as provided by law.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY AS TO ALL ISSUES.

The Plaintiffs, By their Attorney,

Donald R. Grady, Jr.

BBO # 544841

SHEFF LAW OFFICES, P.C.

10 Tremont Street Daniel Webster Suite Boston MA 02108

BBQ # 544841

Date 5 12-15



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March 19, 2010

VIA e-mail: sralston@tuftsmedicalcenter.org

And First Class Mail

WILLIAM J. DAILEY, JR., JOHN P. RYAN ROBERT M. GAYNOR EDWARD T. HINDHEY LAWRENCE J. KICKNEY, JR.

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LAURA MEYER GREGO

BRIAN H. SULLIVAN

PERSONAL & CONFIDENTIAL

Steven J. Ralston, M.D. TUFTS MEDICAL CENTER 800 Washington Street, Box 851 Boston, MA 02111

> RE: Kimberly Norton, et al. v. Steven J. Ralston, M.D., et al. <u>Suffolk Superior Court Civil Action No.: SUCV2009-01808-A</u>

Our File No.: NE-362-3489

Dear Dr. Ralston:

We are pleased to inform you that the court has dismissed the Kimberly Norton matter. We recently filed a Motion to Dismiss the Plaintiffs' Complaint and for Entry of Final Judgment for Plaintiffs' Failure to Post a Bond. The court allowed our Motion on February 10, 2010. The time in which the Plaintiffs could have appealed the judgment has now passed.

With regard to future licensing purposes we enclose for your files a copy of the Finding of the Medical Malpractice Tribunal dated November 30, 2009, finding in your favor, as well as a copy of the court's Notice of Docket Entry dated February 17, 2010, dismissing this matter.

Should you need any assistance in the future, please do not hesitate to contact us.

Very truly yours,

Enc. WJDIII:cb

cc: Paul Donovan

DEGETVE M JUN 06 2016

Commonwealth of Massachi - etts County of Suffolk The Superior Court

December 3, 8009 VR -362-3489

CIVIL DOCKET# SUCV2009-01808

Kimberlly Norton, et al Steven J Raiston MD FINDING OF THE MEDICAL MALPRACTICE TRIBUNAL (Pursuant to M.G.L. Chapter 231, Section 60(b) as amended) The above entitled action came on for hearing before the appointed medical tribunal on 11/30/2009, and was argued by counsel, and thereupon, upon consideration thereof, the plaintiff(s) offer of proof, pleadings, hospital records and other documents presented, the tribunal finds: *(1) For the plaintiff(e) and that the evidence presented if properly substantiated is sufficient to raise a legitimate question of liability appropriate for judicial inquiry. *(2) For defendant(s) plaintiff(s) action is merely an unfortunate medical result. If a finding is made for the defendant or defendants in the above entitled action the plaintiff may pursue the claim through the usual judicial process only upon filing bond in the amount of Six Thousand (\$6,000.00) Dollars in the aggregate secured by cash or its equivalent with the Clerk/Magistrate of this court, payable to the defendant or defendants in said action for costs assessed, including witness and expert fees and attorneys fees if the plaintiff(s) does/do not prevail in the final judgment. The presiding justice may, within his/her discretion, increase the amount of the bond required to be filed. If said bond is not posted within thirty (30) days of the tribunal's finding the action shall be dismissed. Upon motion filed by the plaintiff(s), and a determination by the court that the plaintiff(s) is/are indigent said justice may reduce the amount of the bond but may not eliminate the requirement thereof. K'D' 13-01-04 Maler Sent Dated: 11/30/2009 S.4W. Justice of the Superior Court B. of H. Associate Justice

*strike inapplicable words

Legal Member:

Medical Member:

cm



FALCAO, MD Nor30, 5 Physician - Tribunal Member

*Health Care Provider - Tribunal Member

Commonwealth of Massachusetts County of Suffolk The Superior Court

CIVIL DOCKET#: SUCV2009-01808-A

RE: Norton et al v Raiston MD et al

TO: William J Dailey III, Esquire

Sloane & Walsh 3 Center Plaza Boston, MA 02108

NOTICE OF DOCKET ENTRY

You are hereby notified that on 02/17/2010 the following entry was made on the above referenced docket:

JUDGMENT (PURSUANT TO GL c231 Section 60B) That the complaint of plffs is dismissed as to defts entered on docket pursuant to Mass R Civ P 58(a) and notice sent to parties pursuant to Mass R Civ P 77(d)

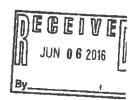
Dated at Boston, Massachusetts this 17th day of February, 2010.

Michael Joseph Donovan, Clerk of the Courts

> BY: Elaina M. Quinn Assistant Clerk

Telephone

Disabled individuals who need handlesp accommodations should contact the Administrative Office of the Superior Court at (617) 788-8130



Commonwealth of Massachusetts County of Suffolk The Superior Court

CIVIL DOCKET# SUCV2009-01808

Kimberlly Norton. Edward Norton,

Plaintiff(s)

Steven J Ralston MD, Jane Doe RN,

Defendant(s)

JUDGMENT (Pursuant to G.L. c 231, Section 60B)

This action came on before the Court, Paul E. Troy, Justice, presiding, the plaintiffs, having failed to file a Bond under G.L. c. 231, Section 60B, and upon

It is ORDERED and ADJUDGED:

That the Complaint of the Plaintiff, Kimberly Norton and Edward Norton, as to defendants, Steven J Raiston, MD, and Jane Doe RN.

Dated at Boston, Massachusetts this 11th day of February, 2010.

JUBOMENT ENTERED ON DOCKET 2010 2010 PURSUANT TO THE PROVISIONS OF HIS SE. N. CIV. P. EGE AND NOTICE SENT TO PARTIES PURSUANT TO THE PROVISIONS OF MASS. R. CIV. P. 77(4) AS FOLLOWS

TRUE COPY OF HUDGHENT DULY ENTERED BY

SUFFOLK, SS.

COMMONWEALTH OF MASSACHUSETTS

SUPERIOR COURT

Civil Action No.: SUCV2009-01808-A

KIMBERLY NORTON and EDWARD NORTON, **Plaintiffs**

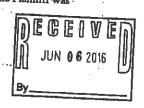
STEVEN J. RALSTON, M.D. and JANE DOE, R.N., Defendants

FHI2: 63

MOTION OF THE DEFENDANTS, STEVEN J. RALSTON, M.D. AND JANE DOE, R.N., TO DISMISS PLAINTIFFS' COMPLAINT AND FOR ENTRY OF FINAL JUDGMENT FOR PLAINTIFFS' FAILURE TO POST A BOND (Pursuant to M.G.L. c.231, §60B)

NOW COME the Defendants, Steven J. Ralston, M.D. and Jane Doe, R.N. (hereinafter collectively "Defendants"), and respectfully move that this Honorable Court dismiss the instant action against the Defendants pursuant to M.G.L. c. 231, §60B and to enter final judgment with prejudice in the Defendants' favor pursuant to Mass. R. Civ. P. 58(a)(2). In support of their Motion, the Defendants state as follows:

- This is an action for malpractice, error or mistake, within the terms of M.G.L.-c. 231, §60B. Pursuant to that statute, a medical malpractice tribunal as to the Defendants was convened on November 30, 2009.
- On November 30, 2009, the tribunal found in favor of the Defendants. Copies of the tribunal's findings are attached hereto as Exhibit A. The decision of the tribunal was docketed on December 2, 2009. Accordingly, pursuant to M.G.L. c. 231, §60B, the Pläintiff was



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Commonwealth of Massachusetts

NOTICE TO DEFENDANT — You need not appear personally in court to answer the complaint, but if you claim to have a paginal in the Clerk's Office.

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SUFFOLK, SS.

SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT CIVIL ACTION

	No. 09-1808-A			
Kimberly	Norton &	& Edward	Norton	, Plaintiff(s)
				, 2 sament(s)
	•	v.		
Steven J.	Ralston,	M.D., J	ane Doe,	R.N.:
	-			——- , DCICHOMINS)

SUMMONS

To the above-named Defendant: Steven J. Ralston, M.D.

You are hereby summoned and required to serve upon Kevin Donius, Esq.

Law Offices of Revin Donius, P.C.

plaintiff's attorney, whose address is 424 Adams St., Suite 100, Milton, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Boston either before service upon plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by Rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Barbara J. Rouse	, Esquire, at Boston, the	9±h	day o
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When more thus one defendant is involved, the names of all defendants should appear in the caption. If a
cach should be addressed to the particular defendant.

3. TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED
(I) TORT —(2) MOTOR VEHICLE TORT —(3) CONTRACT —(4) EQUITABLE RELIEF —(5) DEVER

FORM CIV.P. 1 3rd Rev. 10M - 10/08

COMMONWEALTH OF MASSACRUSETTS

SUPERIOR COURT DEPARTMENT OF THE TRIAL COURT CIVIL ACTION #:

KIMBERLY NORTON AND EDWARD

Plaintiffs,

COMPLAINT AND DEMAND

STEVEN J. RALSTON, M.D., JANE DOE, R.N. Defendants.

I. THE PARTIES

- 1. The Flaintiffs, Kimberly and Edward Norton, were at all times relevant, residents of Brockton, Plymouth County, Massachusetts.
- 2. The Defendant, Steven J. Ralston, M.D., ("Dr. Ralston") was at all times relevant to this complaint a physician licensed to practice medicine in Massachusetts, maintaining his principal place of business at Tufts Medical Center, Boston, Massachusetts.
- 3. The Defendant, Jane Doe, R.N., was at all time relevant to this complaint, a registered nurse licensed in Massachusetts.

II. GENERAL FACTUAL ALLEGATIONS

On or around February 14, 2006, the Plaintiff, Kimberly Norton, presented to her OB/GYN where it

determined by ultrasound that she was approximately eight (8) weeks pregnant.

- 5. On or around April 11, 2006, testing conducted by the Plaintiff's OB/GYN raised concerns about a molar pregnancy.
- 6. On or around May 18, 2006, the Plaintiff, Kimberly Norton, submitted her self to the care and treatment of the Defendants.
- 7. While in the care and treatment of Defendants, Mrs. Norton began experiencing elevated blood pressure levels. The Plaintiff, Mrs. Norton, was eventually discharged home by the Defendants with no medication, instruction, or acknowledgment of her elevated blood pressure levels.
- 8. On or around May 22, 2006, the Plaintiff, Kimberly Norton, began complaining of severe headaches and eventually had a seizure. Mrs. Norton was taken via ambulance to the hospital where it was determined she had suffered a stroke.
- 9. In their care of the Plaintiff, Mrs. Norton, the Defendants failed, among other things, to administer proper medical care to Mrs. Norton and prematurely discharged her even though it was noted on numerous occasions that she had elevated blood pressure levels.

10. As a result of the Defendants' failure to properly care for and treat the Plaintiff, she was discharged home where she eventually suffered a stroke and subsequent injury.

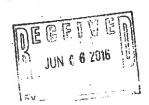
III. CAUSES OF ACTION

COUNT I. NEGLIGENCE/PERSONAL INJURY (Dr. Ralston)

- 11. The Plaintiff reasserts and incorporates herein by reference the factual allegations contained above in Paragraphs 1-10 above.
- 12. The Plaintiff, Mrs. Norton, submitted herself to the care and treatment of the Defendant, Dr. Ralston, who by his negligence, carelessness, and lack of regard for Mrs. Norton's health, care and well-being, treated her in a manner resulting in severe personal injuries.
- 13. On or around May 18, 2006, Mrs. Norton submitted herself to the care and treatment of Dr. Ralston, who by his negligence, carelessness, and lack of regard for her health, care and well-being, treated her in a manner resulting in severe personal injuries.
- 14. The injuries sustained by Mrs. Norton were the direct and proximate result of the carelessness,

unskillfulness, negligence and improper care and treatment by Dr. Ralston, including, but not limited to the following:

- a. Dr. Ralston's misrepresentations to the Plaintiff that he was knowledgeable, skillful, and competent to diagnose and treat Mrs. Norton's medical condition.
- b. Dr. Ralston's failure to adequately and properly diagnose Mrs. Norton's medical condition and his failure to prescribe proper and timely treatment for said condition;
- c. Dr. Ralston's failure to recognize, or have the knowledge to recognize his inability to diagnose and treat Mrs. Norton's condition when he knew or should have known in the exercise of due care, the foreseeable consequences of his inability to properly and skillfully provide Mrs. Norton with acceptable medical and diagnostic services;
- d. Dr. Ralston's failure to possess or negligent failure to exercise the same degree of skill, training, and care as is possessed by average qualified members of the medical profession taking into account advances in the profession; and

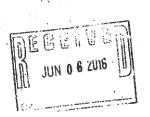


- e... Dr. Ralston's negligent failure to properly treat
 Mrs. Norton's injuries.
- 15. As a direct and proximate result of Dr. Ralston's negligence, carelessness, and unskillfulness, Mrs. Norton was caused to sustain severe and permanent personal injuries, some or all of which are permanent; has incurred and will continue to incur great expense for her medical, surgical, and hospital care and treatment; has suffered and will continue to suffer great pain of body and anguish of mind; has been and will require future hospitalization; has been and will continue to be unable to pursue normal activities; and her ability to earn income and enjoy life has been permanently adversely affected.

WHEREFORE, the Plaintiff, Mrs. Norton, prays judgment against the Defendant, Steven J. Ralston, M.D., in an amount to be determined by a jury, together with interest and costs.

COUNT II. BREACH OF CONTRACT (Dr. Ralston)

16. The Plaintiff reasserts and incorporates herein by reference the factual allegations contained above in Paragraphs 1-10.



- 17. The Defendant contracted with Mrs. Norton to provide professional services related to her medical care.
- 18. The Defendant, Dr. Ralston, expressly and impliedly warranted to Mrs. Norton that he would perform and render said professional services in accordance with accepted standards for the practice of medicine, and that he would possess and exercise that degree of skill and care possessed and exercised by the average qualified members of the medical profession practicing their specialty.
- 19. The Defendant breached his express and implied warranties by failing to perform and render professional services in accordance with accepted standards for the practice of medicine, and by failing to possess and exercise that degree of skill and care possessed and exercised by the average qualified members of the medical profession practicing their specialty, which breach resulted in the severe personal injury to Mrs. Norton.
- 20. As a direct and proximate result of Dr. Ralston's breach of his express and implied warranties, Mrs. Norton was caused to sustain severe and permanent personal injuries, some or all of which are permanent; has incurred and will continue to incur great expense for her medical, surgical, and hospital care and treatment; has suffered and

will continue to suffer great pair of body and anguish of mind; has been and will require future hospitalization; has been and will continue to be unable to pursue normal activities; and her ability to earn income and enjoy life has been permanently adversely affected.

WHEREFORE, the Plaintiff, Mrs. Norton, prays judgment against the Defendant, Steven J. Ralston, M.D., in an amount to be determined by a jury, together with interest and costs.

COUNT III. ENFORMED CONSENT (Dr. Ralston)

- 21. The plaintiff reasserts and incorporates herein by reference the factual allegations contained above in Paragraphs 1-10 above.
- 22. On or around May 18, 2006, Mrs. Norton submitted herself to the care and treatment of Dr. Ralston, who by his negligence, carelessness, and lack of regard for her health, care and well-being, treated her in a manner resulting in severe personal injuries.
- 23. The injuries sustained by Mrs. Norton were the direct and proximate result of the carelessness, unskillfulness, negligence and improper care and treatment by Dr. Ralston, including, but not limited to the following:

- a. Dr. Ralston's misrepresentations to the Plaintiff
 that he was knowledgeable, skillful, and competent
 to diagnose and treat Mrs. Norton's medical
 condition.
- b. Dr. Ralston's failure to adequately and properly diagnose Mrs. Norton's medical condition and his failure to prescribe proper and timely treatment for said condition;
- c. Dr. Ralston's failure to recognize, or have the knowledge to recognize his inability to diagnose and treat Mrs. Norton's condition when he knew or should have known in the exercise of due care, the foreseeable consequences of his inability to properly and skillfully provide Mrs. Norton with acceptable medical and diagnostic services;
- d. Dr. Ralston's failure to possess or negligent failure to exercise the same degree of skill, training, and care as is possessed by average qualified members of the medical profession taking into account advances in the profession; and
- e. Dr. Ralston's negligent failure to properly treat
 Mrs. Norton's injuries.

24. As a direct and proximate result of Dr. Ralston's negligence, carelessness, and unskillfulness, Mrs. Norton was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for her medical, surgical, and hospital care and treatment; has suffered and will continue to suffer great pain of body and anguish of mind; has been and will require future hospitalization; has been and will continue to be unable to pursue normal activities; and her ability to earn income and enjoy life has been permanently adversely affected.

WHEREFORE, the Plaintiff, Mrs. Norton, demands judgment against the Defendant, Steven J. Ralston, M.D., for the above-described personal injuries in an amount to be determined by a jury at trial, together with interest and costs.

COUNT IV. LOSS OF CONSORTIUM (Dr. Ralston)

- 25. The Plaintiff, Edward Norton, repeats and reavers fully herein Paragraphs 1 through 10 of this Complaint as if each were set forth in its entirety.
- 26. As a result of the injuries sustained by his wife, Kimberly Norton, the Plaintiff, Edward Norton suffered the



loss of her services, society, affection, companionship, relations, and consortium.

WHEREFORE, the Plaintiff, Edward Norton, demands judgment against the Defendant, Steven J. Ralston, M.D., for the above-described loss of consortium in an amount to be determined by a jury at trial, together with interest and costs.

COUNT V. MEGLIGENCE/PERSONAL INJURY (Jame Doe, R.N.)

- 27. The Plaintiff reasserts and incorporates herein by reference the factual allegations contained above in Paragraphs 1-10 above.
- 28. The Plaintiff submitted herself to the care and treatment of the Defendant, Jane Doe, R.N., who by his/her negligence, carelessness, and lack of regard for Mrs.

 Norton's health, care and well-being, treated her in a manner resulting in severe personal injuries.
- 29. On or around May 18, 2006, Mrs. Norton submitted herself to the care and treatment of the Defendant, who by his/her negligence, carelessness, and lack of regard for her health, care and well-being, treated her in a manner resulting in severe personal injuries.

- 30. The injuries sustained by Mrs. Norton were the direct and proximate result of the carelessness, unskillfulness, negligence and improper care and treatment by the Defendant, including, but not limited to the following:
 - a. The Defendant's misrepresentations to the Plaintiff that he/she was knowledgeable, skillful, and competent to diagnose and treat Mrs. Norton's medical condition.
 - b. The Defendant's failure to adequately and properly diagnose Mrs. Norton's medical condition and his/her failure to prescribe proper and timely treatment for said condition;
 - c. The Defendant's failure to recognize, or have the knowledge to recognize his/her inability to diagnose and treat Mrs. Norton's condition when he/she knew or should have known in the exercise of due care, the foreseeable consequences of his/her inability to properly and skillfully provide Mrs. Norton with acceptable medical and diagnostic services;
 - d. The Defendant's failure to possess or negligent failure to exercise the same degree of skill,

training, and care as is possessed by average qualified members of the nursing profession taking into account advances in the profession; and

- e. The Defendant's negligent failure to properly treat Mrs. Norton's injuries.
- Jane Doe, R.N.'s, negligence, carelessness, and unskillfulness, Mrs. Norton was caused to sustain severe and permanent personal injuries, some or all of which are permanent; has incurred and will continue to incur great expense for her medical, surgical, and hospital care and treatment; has suffered and will continue to suffer great pain of body and anguish of mind; has been and will require future hospitalization; has been and will continue to be unable to pursue normal activities; and her ability to earn income and enjoy life has been permanently adversely affected.

WHEREFORE, the Plaintiff, Mrs. Norton, prays judgment against the Defendant, Jane Doe, R.N., in an amount to be determined by a jury, together with interest and costs.

COUNT II. BREACH OF CONTRACT (Jame Doe, R.N.)

- 32. The Plaintiff reasserts and incorporates herein by reference the factual allegations contained above in Paragraphs 1-10.
- 33. The Defendant contracted with Mrs. Norton to provide professional services related to her medical care.
- 34. The Defendant, Jane Doe, R.N., expressly and impliedly warranted to Mrs. Norton that he/she would perform and render said professional services in accordance with accepted standards for the practice of medicine, and that he/she would possess and exercise that degree of skill and care possessed and exercised by the average qualified members of the nursing profession practicing their specialty.
- 35. The Defendant breached his/her express and implied warranties by failing to perform and render professional services in accordance with accepted standards for the practice of medicine, and by failing to possess and exercise that degree of skill and care possessed and exercised by the average qualified members of the nursing profession practicing their specialty, which breach resulted in the severe personal injury to Mrs. Norton.

Jane Doe, R.N.'s, breach of his/her express and implied warranties, Mrs. Norton was caused to sustain severe and permanent personal injuries, some or all of which are permanent; has incurred and will continue to incur great expense for her medical, surgical, and hospital care and treatment; has suffered and will continue to suffer great pain of body and anguish of mind; has been and will require future hospitalization; has been and will continue to be unable to pursue normal activities; and her ability to earn income and enjoy life has been permanently adversely affected.

WHEREFORE, the Plaintiff, Mrs. Norton, prays judgment against the Defendant, Jane Doe, R.N., in an amount to be determined by a jury, together with interest and costs.

(Jane Doe, R.N.)

- 37. The plaintiff reasserts and incorporates herein by reference the factual allegations contained above in Paragraphs 1-10 above.
- 38. On or around May 18, 2006, Mrs. Norton submitted herself to the care and treatment of the Defendant, Jane Doe, R.N., who by his/her negligence, carelessness, and lack



of regard for her health, care and well-being, treated her in a manner resulting in severe personal injuries.

- 39. The injuries sustained by Mrs. Norton were the direct and proximate result of the carelessness, unskillfulness, negligence and improper care and treatment by the Defendant, Jane Doe, R.N., including, but not limited to the following:
 - a. The Defendant's misrepresentations to the Plaintiff that he/she was knowledgeable, skillful, and competent to diagnose and treat Mrs. Norton's medical condition.
 - b. The Defendant's failure to adequately and properly diagnose Mrs. Norton's medical condition and his/her failure to prescribe proper and timely treatment for said condition;
 - c. The Defendant's failure to recognize, or have the knowledge to recognize his/her inability to diagnose and treat Mrs. Norton's condition when he/she knew or should have known in the exercise of due care, the foreseeable consequences of his/her inability to properly and skillfully provide Mrs. Norton with acceptable medical and diagnostic services;

- d. The Defendant's failure to possess or negligent failure to exercise the same degree of skill, training, and care as is possessed by average qualified members of the nursing profession taking into account advances in the profession; and
- e. The Defendant's negligent failure to properly treat Mrs. Norton's injuries.
- 40. As a direct and proximate result of the Defendant's negligence, carelessness, and unskillfulness, Mrs. Norton was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for her medical, surgical, and hospital care and treatment; has suffered and will continue to suffer great pain of body and anguish of mind; has been and will require future hospitalization; has been and will continue to be unable to pursue normal activities; and her ability to earn income and enjoy life has been permanently adversely affected.

WHEREFORE, the Plaintiff, Mrs. Norton, demands judgment against the Defendant, Jane Doe, R.N., for the above-described personal injuries in an amount to be determined by a jury at trial, together with interest and costs.

COUNT IV. LOSE OF CONSORTIUM (Jane Doe, R.N.)

- 41. The Plaintiff, Edward Norton, repeats and reavers fully herein Paragraphs 1 through 10 of this Complaint as if each were set forth in its entirety.
- 42. As a result of the injuries sustained by his wife, Kimberly Norton, the Plaintiff, Edward Norton suffered the loss of her services, society, affection, companionship, relations, and consortium.
- y wherefore, the Plaintiff, Edward Norton, demands judgment against the Defendant, Jane Doe, R.N., for the above-described loss of consortium in an amount to be determined by a jury at trial, together with interest and costs.

THE PLAINTIFFS CLAIMS TRIAL BY JURY.



PLAINTIFFS, Kimberly and Edward Norton, By their Attorney,

Kevin Donius, Esquire

Law Offices of Kevin Donius, P.C.

424 Adams Street, Suite 100

Milton, MA 02186

TEL FAX

(617) 296-4990

BBO#: 551298

Dated: April 28, 2009



	COVER SHEET	Superior Court Department
1	PLAINTIFF(S)	County:
	Kimberly Norton & Edward Norton	Steven J. Ralston, M.D. and
].	*	Jane Doe, R.N.
	ATTORNEY FRM NAME ADDRESS AND TELEPHONE Kevin Donius 424 Adams St., Milton, MAC2186	ATTORNEY (Eknown)
	Board of Bar Overseers number: 551298	
.,-	Origin code and	track designation
	Place an x in one box only: 1. F01 Original Complaint 2. F02 Removal to Sup.Ct. C.231,s.104 (Before trial) (F)	4. F04 District Court Appeal c.231, s. 97 & 104 (Afte trial) (X) 5. F05 Reactivated after rescript; relief from judgment/Order (Mass.R.Civ.P. 60) (X)
- 1	3. F03 Retransfer to Sup.Ct. C.231,s.102C (X)	6. E10 Summary Process Appeal (X)
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r	"I hereby certify that I have complied with the requirements of Dispute Resolution (SJC Rule 1:18) requiring that I provide	of Rule 5 of the Supreme Judicial Court Uniform Rules
	Dispute Resolution (SJC Rule 1:18) requiring that I provide mesolution services and discuss with them the advantage.	ny clients with information about court-connected discu
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. r	Signature of Attorney of Record	Jon V



https://www.npdb.hrsa.gov

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Page: I of 1

RALSTON, STEVEN JOSEPH - SELF-QUERY RESPON	MGE
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Date of Birth: Work Address: 158 W CONCORD St	Gend T, BOSTON, MA 02118-150		
NPI: 1003870015	DEA:	BR4037861	
Professional School(s): COLUMBIA UNIVERS	79380, MA, OBSTETRICS (SITY COLLEGE OF PHYSICL)	NS AND SURGEONS (1990)
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Exclusion or Debarment Action(s): Government Administrative Action(s):	No Reports DE	A/Federal Licensure Ac	tion(s): No Reports
Clinical Privileges Action(s):	No Reports Ju No Reports Pe	dgment or Conviction Re er Review Organization	eport(s): No Reports

Copies of these reports are enclosed for restricted/limited use as prescribed by statutes listed on the preceeding cover page.

No Reports Found



Certificate of Completion

the energy between the con-

CANAL SALVANE SALVANE

Recognizing and Reporting Child Abuse:

Meets ACT 31 of 2014 training requirements

Meets the Recognizing Child Abuse and Mandated Reporting components of ACT 126 of 2013 training requirements

3 continuing education hours

Presenter:

University of Pittsburgh School of Social Work,

PA Child Welfare Resource Center

403 East Winding Hill Road, Mechanicsburg, PA 17055



Provider Number: CACE000004

CE Course Number: PCW000001

Baps hower found out on do him on 2010 or \$1.00 proceed.

Presented to: Ralston, Steven

on the date: June 3, 2016

Tracy Sosra, Director of Continuing Education School of Social Work

Many rose McCarrity. Director PA Child Welfare Resource Center

PRINT





American College of Obstetricians and Gynecologists

2016 Annual Clinical and Scientific Meeting

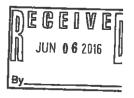
Washington, DC

May 14-17, 2016

Continuing Medical Education Verification of Attendance Form CME Verification For: STEVEN J. RALSTON Registration ID: 701433

Session ID	Session Title	Credits
CS01	Key Issues in the Identification and Management of Postpartum Hemorrhage	
CS26	Update on Management of Abnormal Placentation	4
COL1A	The Hale Lecture - The Four Horsemen of the Medical System Apocalypse	
COL1B	The Anna Marie D'Amico Lecture - Trafficking and Misogyny	1
COL1C	The Jim and Midge Breeden Lecture - The Power of One	
COL17	Green Choice Fund-The Letest on Zike Virus: Ob/Gyn Response in This World of Uncertainty	1

Total Sessions Evaluated: 6 Total Credita Earned: 6



This confirms that the individual designated above has met all the requirements of the above course (s) for awarding applicable continuing medical education (CME).

ACCME ACCREDITATION

The American College of Obstetricians and Gynecologists is accredited by the Accreditation Council for Continuing Medical Education (ACCME) to provide continuing medical education for physicians.

AMA PRA CATEGORY 1 CREDIT(S) ™

The American College of Obstetricians and Gynecologists designates this live activity for a maximum of 30 AMA PRA Category 1 Credit(s) ™. Physicians should only claim credit commensurate with the extent of their participation in the activity.

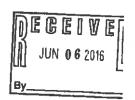
COLLEGE COGNATE CREDIT(S)

The American College of Obstetricians and Gynecologists designates this live activity for a maximum of 30 College Cognate Credits toward the Program for Continuing Professional Development for the Annual Meeting. The College has a reciprocity agreement with the AMA that allows AMA PRA Category 1 Credits™ to be equivalent to College Cognate Credits.

Physicians may claim either AMA PRA Category 1 Credit(s) ™ OR College Cognate Credit. Physicians may NOT claim both.

Please note: Continuing medical education credits issued for participation in CME activities offered by the American College of Obstetricians and Gynecologists may not apply toward license renewal in all states. You will want to verify the requirements of your state licensing board(s). Participants should retain the verification of attendance form for their records.

THE AMERICAN COLLEGE OF OBSTETRICIANS AND GYNECOLOGISTS - Women's Health Care Physicians
409 12[™] Street SW Washington DC 20024-2188
Melling Address: ACOG COGNATE PROGRAM~PO Box 96920 Washington DC 20090-6920
202/638/5577



The Harvard Medical School is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.

THE HARVARD MEDICAL SCHOOL



certifies that

Steven Ralston

has participated in the live activity titled

BIDMC OBGYN Grand Rounds

July 1, 2014 - June 30, 2015

and is awarded 25.0 AMA PRA Category 1 Credits TM

This activity meets the criteria of the Massachusetts Board of Registration in Medicine for 8.0 credits of Risk Management Study.

7

Ajay K. Singh, MBBS, FRCP, MBA Associate Dean for Global and Continuing Education Harvard Medical School

Deston, Massachusetts

The Harvard Medical School is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.

THE HARVARD MEDICAL SCHOOL



certifies that

Steven Ralston

has participated in the live activity titled

Medical Grand Rounds

July 1, 2014 - June 30, 2015

and is awarded 1.0 AMA PRA Category 1 CreditTM

Ajay K. Singh, MBBS, FRCP, MBA Associate Dean for Global and Continuing Education Harvard Medical School

Boston, Massachusetts

CRICO/ Risk Management Foundation of the Harvard Medical Institutions

0

certifies that

Steven Ralston

has participated in the educational activity titled

Obstetrical Teamwork and Simulation

at Beth Israel Deaconess Medical Center, Boston, MA on September 9, 2015.

This activity was designated for 3 AMA PRA Category I Credits TM.

This activity has been designed to be suitable for 3 hours of Risk Management Study in Massachusetts.

Luke Sato, MD

Sr. Vice President and Chief Medical Officer

CTICO Protecting Providers.

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crico

BIDMC Obstetrical Teamwork and Simulation Course Beth Israel Deaconess Medical Center, Boston, MA September 9, 2015 Sponsored by CRICO/RMF of the Harvard Medical Institutions

CRICO/Risk Management Foundation of the Harvard Medical Institutions is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.

CRICO/RMF designates this live activity for a maximum of 3 AMA PRA Category I Credits. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

This activity is designed to be suitable for 3 hours of Risk Management study in Massachusetts.

Faculty Disclosure Information: CRICO/RMF holds the standard that our continuing medical education activities be free of commercial bias, with content that is independent, objective, balanced and scientifically rigorous. As an ACCME accredited provider, we ensure that all faculty, course directors, planners, and their spouses or partners, participating in any CRICO/RMF activity disclose any potential conflicts of interest that may influence the content of this activity. The information below describes any relationship planners or faculty may have had in the past 12 months with commercial interests such as pharmaceutical companies, biomedical device manufacturers, or other corporations whose products or services may be relevant to their contribution to this activity. Our intent is to openly and transparently identify potential conflicts that may be important to learners' in their evaluation of this activity.

The following authors, planners and/or reviewers have reported no significant relationships with commercial interests:

Mary Vadnais	Susan Kilbride	Toni Golen	Tracey Pollard	Hope Ricciotti
Michael McBride	Darren Tavernelli	Eliza Mead	Leslie Guglielmo	Celeste Royce
Chanel Harding	Steven Ralston	Monica Mendoila	Susan Crafts	Sandra Mason
Dave Fobert	Lucy Chie	Susan Mann	Lyda Niemiec	Phil Hess
Justin Stiles	Scott Shainker	L. Meredith Atkins	Ellen Gallery	Michelle Mercuio
Melissa Spiel	Galina Korsunsky			

The following authors, planners and/or reviewers have reported receiving something of value from a company whose product may be germane to the content of their presentations:

None

By Human Resource policy, CRICO/RMF employees involved as planners or faculty have no relationship relevant to this project.

Lisa Heard Jane E. Gagne

DE GE 17

The Harvard Medical School is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.

THE HARVARD MEDICAL SCHOOL



certifies that

Steven Ralston

has participated in the live activity titled

Medical Management Conference (M&M's)

July 1 - December 31, 2013

and is awarded 1.0 AMA PRA Category I CreditTM

This activity meets the criteria of the Massachusetts Board of Registration in Medicine for 1.0 credits of Risk Management Study.

Sanjiv Chopra, M.B.B.S., M.A.C.P. Faculty Dean for Continuing Education Professor of Medicine

कि Boston, Massachusetts

The Harvard Medical School is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for physicians.

THE HARVARD MEDICAL SCHOOL



certifies that

Steven Ralston

has participated in the live activity titled

BIDMC OBGYN Grand Rounds

January 1 - June 30, 2013

and is awarded 8.0 AMA PRA Category I Credits TM

This activity meets the criteria of the Massachusetts Board of Registration in Medicine for 1.0 credits of Risk Management Study.

Boston, Massachusetts

Sanjiv Chopra, M.B.B.S., M.A.C.P. Faculty Dean for Continuing Education Professor of Medicine

DECEIVE JUN 06 2016

The American College of Obstetricians and Gynecologists

PROGRAM FOR CONTINUING PROFESSIONAL DEVELOPMENT



ACOG COGNATE PROGRAM

TRANSCRIPT

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ACOG ID Number: 0004023351

Steven J. Raiston MD, MPH Kirstein 3rd Floor 330 Brookline Ave Boston, MA 02215-5400

Cognates Posted Through Wednesday, June 01, 2016

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	BOG MOC Part 2 Article Review	35.00	38.0
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Total COGNATE Credits This Cycle: 68.00

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Reporting Years Total COGNATE Credits

2017 0.00 2018 0.00 2019 0.00

Total COGNATE Credits This Cycle: 0.00



STEVEN JOSEPH RALSTON DOB 5/13/63

License: MD051583L

UPDATED CV WITH MONTHS/YEARS

Faculty Academic Appointments		
July 1994- June 1996 Assistant Clinical Professo	or OB/GYN	Tufts Univ. Sch. of Med.
[July 1996 - June 1998: Fellowship Training]		
July 1998- June 2005 Assistant Professor	OB/GYN	Tufts Univ. Sch. of Med.
July 2005- Dec 2011 Associate Professor	OB/GYN	Tufts Univ. Sch. of Med.
July 2007- Dec 2011 Adjunct Clinical Professor		Northeastern University
Jan 2012 - July 2012 Lecturer	OB/GYN	Harvard Medical School
July 2012-present Associate Professor	OB/GYN	Harvard Medical School
Appointments at Hospitals/Affiliated Institution	ane.	

Appo Past

July 1994- June1996 Attending Staff	OB/GYN	Beverly Hospital
July 1994- June1996 Attending Staff	OB/GYN	Lynn Community Health Center
July 1996- June 1999 Attending Staff	OB/GYN	Cambridge Hospital
July 1998- June 2003 Attending Staff	OB/GYN	South Shore Hospital

Present

OB/GYN	Tufts Medical Center
OB/GYN	Lawrence General Hospital
OB/GYN	Lowell General Hospital
OB/GYN	Melrose-Wakefield Hospital
OB/GYN	Beth Israel Deaconess Medical Ctr.
OB/GYN	Harvard Vanguard Associates
	OB/GYN OB/GYN OB/GYN OB/GYN

Curriculum Vitae

Date Prepared: 2/21/15

Name: Steven Joseph Ralston, MD, MPH

Office Address: 330 Brookline Ave, Boston, MA 02215 Home Address: 158 W Concord St, Boston, MA 02118

Work Phone: 617-667-4836

Work E-Mail: sraiston@bidmc.harvard.edu

Work FAX: 617-667-1459

Place of Birth: Passaic, NJ

Education

1985 B.S.

Molecular Biophysics & Biochemistry Yale College

Honors: Summa Cum Laude

Phi Beta Kappa Distinction in Major

1990 MD

Medicine

Alpha Omega Alpha Honors:

Columbia

2011

MPH

Health Law, Bioethics, & Human Rights Honors: Capstone Award

Boston University

Post Doctoral Training

06/90-06/94 Resident 07/96-06/98

Fellow

OB/GYN Maternal-Fetal Medicine

Yale-New Haven Hospital

Tufts-NEMC

Faculty Academic Appointments

1994-1996	Assistant Clinical Professor	OB/GYN	Tufts Univ. Sch. of Med.
1998-2005	Assistant Professor	OB/GYN	Tufts Univ. Sch. of Med.
2005-2011	Associate Professor	OB/GYN	Tufts Univ. Sch. of Med.
2007-2011	Adjunct Clinical Professor		Northeastern University
2012	Lecturer	OB/GYN	Harvard Medical School
2012-present	Associate Professor	OB/GYN	Harvard Medical School
		05.0111	

Appointments at Hospitals/Affiliated Institutions (all Massachusetts)

Past		•	
1994-1996	Attending Staff	OB/GYN	Beverly Hospital
1994-1996	Attending Staff	OB/GYN	Lynn Community Health Center
1996-1999	Attending Staff	OB/GYN	Cambridge Hospital
1998-2003	Attending Staff	OB/GYN	South Shore Hospital



1998-2011 1998-2011 1998-2011 2000-2011	Attending Staff Attending Staff Attending Staff Attending Staff	OB/GYN OB/GYN OB/GYN OB/GYN	Tufts Medical Center Lawrence General Hospital Lowell General Hospital
·· · ·	0		
2012 - present	Attending Staff	OB/GYN	Melrose-Wakefield Hospital Beth Israel Deaconess Medical Ctr.
2012 - present	Attending Staff	OB/GYN	Harvard Vanguard Associates

Other Professional Positions
2008-present Board Member Planned Parenthood League of Massachusetts

Major Administrative Leadership Positions

Local	····	
2000 - 2007	Director, OB/GYN 3rd-Year Clerkship	Tufts Univ. Sch. of Med.
2004 – 2007	Chair, Core Collaborators Group	Tufts Univ. Sch. of Med.
2006 - 2007	Director, Medical Ethics Course	Tufts Univ. Sch. of Med.
2006 - 2011	Medical Director, Prenatal Diagnosis Center	Tufts Medical Center
2007 – 2011	Director, Ethics Grand Rounds (small groups)	Tufts Medical Center
2008 - 2011	Director, OB/GYN 3rd-Year Clerkship	Tufts Univ. Sch. of Med.
2009 2010	Interim Division Chief, MFM	Tufts Medical Center
2010 – 2011	Chair, Core Collaborators Group	Tufts Univ. Sch. of Med
2010 – 2011	Assoc. Dir., Med. Ethics & Professionalism	Tufts Univ. Sch. of Med.
2010 – 2011	Associate Director, Ethics Key Theme	Tufts Univ. Sch. of Med.
2011 - 2011	Director, 4th year Elective (MFM)	Tufts Medical Center
2012 – present	Division Director, Maternal-Fetal Medicine	Beth Israel Deaconess
2012 - present	Fellowship Director, Maternal-Fetal Medicine	Beth Israel Deaconess

Regional

1994 – 1996	OB/GYN Coordinator Family Practice Residency	Beverly Hospital
2009 – 2011	Director, Family Med Ob Fellowship	Lawrence General Hosp.

National

2012-Board Examiner, American Board of Obstetrics and Gynecology

Committee Ser	vice	
Local		
1998 – 2009	Credentials Committee 1998 – 2009	Tufts Medical Center Member
1998 – 2011	Ethics Committee 1998 – present	Tufts Medical Center Member
2000 – 2011	Core Collaborators Committee 2000 — 2003 2003 — 2007 2008 — 2010 2010 — present	Tufts Univ. Sch. of Med Member Chair Member Chair
2003 – 2007	LCME Committee 2003 – 2007	Tufts Univ.Sch. of Med.
2003 – 2007	University Wide Ethics Committee (ad hoc) 2003 – 2007	Tufts University Member JUN 0 6 2016

2009 – 2011 Ctr for Compassionate Care & Perinatal Hospice Tufts Medical Center 2009 – 2011 Director

Professional Societies

Local		
2002 - present	MA DPH Sharing Arrangement Committee	Member
2012 - present	New England Perinatal Society President, 2014-present	Member
2013 ~ present	Boston Obstetrical Society	Vice President
National		
2007 2012	American College of OB/GYN Ethics Committee	
	2007—2009	Member
	2009 – 2012	Chair

2009 – 2012 American Academy of Pediatrics Committee on Bioethics

2009 – 2012 Liaison Member

2009 – 2012 American Society of Reproductive Medicine Ethics Committee

2009 – 2012 Liaison Member

2014 - present American College of OB/GYN Genetics Committee Member

Editorial Activities

Reviewer

American Journal of Obstetrics and Gynecology Obstetrics and Gynecology Prenatal Diagnosis American Journal of Human Genetics Journal of Law, Medicine, and Ethics Contraception New England Journal of Medicine

Honors and Prizes

1985	Phi Beta Kappa	Yale College
1985	Summa Cum Laude	Yale College
1987	Research Prize	New York City Dept. of Public Health
1990	Alpha Omega Alpha	Columbia College
1994	Outstanding Resident Award	Hospital of St. Raphael
1994	Resident Research Award	Yale-New Haven Hospital
1994	Humanistic Medicine Award	Yale-New Haven Hospital
1994	Outstanding Housestaff Award	Yale School of Medicine
1996	Outstanding Teaching Award	Beverly Hospital
1998	Outstanding Teaching Award	Tufts - New England Medical Center
1999	Outstanding Teaching Award	Tufts - New England Medical Center
2000	Outstanding Teaching Award	Tufts - New England Medical Center
2001	APGO Excellence in Teaching	Tufts - New England Medical Center
2003	Outstanding Teaching in Clinical Sciences	Tufts University School of Medicine
2003	Outstanding Teaching Award	Tufts - New England Medical Center
2003	Philip McGovern Faculty Teaching Award	Tufts - New England Medical Center
2004	Award for Excellence in Teaching	Tufts University School of Medicine
2005	Award for Excellence in Teaching	Tufts University School of Medicine)
2006	Award for Excellence in Teaching	Tufts University School of Medicing
	_	JUN 06 201
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		l Bu

Report of Local Teaching and Training

Teac	ching of Stud	ents in Courses	
	<i>-</i> 2001	Problem Based Learning 1 st and 2 nd year medical students	Tufts University School of Medicine 1-2hrs/wk x 12 weeks
1999	- 2007	Reproductive Pathophysiology 2 nd year medical students	Tufts University School of Medicine 1.5hr lecture
2000	<u> – 2011 </u>	3 rd year clerkship didactic sessions 3 rd year medical students	Tufts University School of Medicine 4 lectures @ 1hr x 8 rotations/yr
2006	- 2009	Medical Ethics 1 st and 2 nd year medical students	Tufts University School of Medicine 5 lectures @ 1.5hrs 5 small group sessions @ 1.5hrs
2007	– 2011	Ethics Grand Rounds	Tufts Medical Center 2 lectures @ 1hr 10 small group sessions @ 1hr
2009	- 2011	Medical Ethics and Professionalism 1 st and 2 nd year medical students	Tufts University School of Medicine 5 lectures @ 1.5hrs 8 small group sessions @ 1.5hrs
2012		Medical Ethics and Professionalism 1 st year medical students	Harvard Medical School 2 small group sessions @ 2 hours
2012		Patient-Doctor III 3 rd year medical students	Harvard Medical School 1 small group session @ 2 hours
2013		Medical Ethics and Professionalism 1 st year medical students	Harvard Medical School 8 small group sessions @ 2 hours
2013		Patient-Doctor III 3 rd year medical students	Harvard Medical School 1 small group session @ 2 hours
2013		Pregnancy Physiology 2 nd year HST students	Harvard Medical School 3 hour lecture



2014	Medical Ethics and Professionalism 1 st year medical students	Harvard Medical School 8 small group sessions @ 2 hours
2014	Patient-Doctor III 3 rd year medical students	Harvard Medical School 2 small group sessions @ 2 hours
2014	OBGYN Boot Camp Ethics in OB/GYN	Harvard Medical School 1 small group session @ 1 hour
2014	HST Functional Human Anatomy Female Pelvic Model Building	Harvard Medical School
2014	Delivering Bad News	4 hours Harvard Medical School
2014	Ethics in Obstetrics 2 nd year HST students	OSCE 3hrs Harvard Medical School
2015	Medical Ethics and Professionalism 1st year medical students	
2015	Patient-Doctor III	8 small group sessions @ 2 hours Harvard Medical School
2015	3 rd year medical students Ethics in Obstetrics	2 small group sessions @ 2 hours Harvard Medical School
2016	2 nd year HST students Essentials of the Profession	3 hour lecture Harvard Medical School
2016	1 st year medical students Patient-Doctor III 3 rd year medical students	8 small group sessions @ 2 hours Harvard Medical School 2 small group sessions @ 2 hours

Formal Teaching	of Residents, Clinical Fellows and Resea	rch Fellows (post-docs):
1999 2000	Perinatal Infections	Tufts Medical Center
	Residents and Fellows	One hour lecture
2000 – 2001	Hypertension in Pregnancy	Tufts Medical Center
	Residents and Fellows	One hour lecture
2001 – 2002	Isoimmunization	Tufts Medical Center
	Residents and Fellows	One hour lecture
2001 – 2002	Holoprosencephaly	Tufts Medical Center
	Residents and Fellows	One hour lecture
	Herpes in Pregnancy	Tufts Medical Center
	Residents and Fellows	One hour lecture
	Non-Invasive Diagnosis of Fetal Anemia	Tufts Medical Center
	Residents and Fellows	One hour lecture
2002 – 2003	Complications of Fetal Blood Sampling	Tufts Medical Center
	Residents and Fellows	One hour lecture
2002 – 2003	Abortion	Tufts Medical Center
2004	Residents and Fellows	One hour lecture
2004 – 2005	Controversies in Abortion	Tufts Medical Center
	Residents and Fellows	One hour lecture
2005 –2006	Pregnancy Physiology	Tufts Medical Center
2007 2000	Residents and Fellows	One hour lecture
2007 -2008	Update on Abortion Laws	Tufts Medical Center



	Residents and Fellows	One hour lecture
2007 – 2008	Predictors of Neurologic Outcome	Tufts Medical Center
2008 -2009	Residents and Fellows Abortion and Preterm Labor	One hour lecture
2000 2000	Residents and Fellows	Tufts Medical Center
	Healthcare Reform and Human Rights	One hour lecture Tufts Medical Center
	Residents and Fellows	One hour lecture
2009 – 2010	Abortion Myths and Controversies	Tufts Medical Center
2040 0044	Residents and Fellows	One hour lecture
2010 – 2011	Ethical Issues in Maternal-Fetal Medicine	Tufts Medical Center
2011-2012	Residents and Fellows Isoimmunization	One hour lecture
2011-2012	Residents	Beth Israel Deaconess
2011-2012	CREOG review	One hour lecture Beth Israel Deaconess
	Residents	One hour lecture
2011-2012	Ethics of Prenatal Screening	Beth Israel Deaconess
	Residents	One hour lecture
2011-2012	Ventriculomegaly	Beth Israel Deaconess
2011-2012	Maternal-Fetal Medicine Fellows	One hour lecture
2011-2012	Herpes Simplex Infection in Pregnancy	Beth Israel Deaconess
2011-2012	Maternal-Fetal Medicine Fellows Prostaglandins	One hour lecture
	Maternal-Fetal Medicine Fellows	Beth Israel Deaconess
2012	Ethics issues in Maternal-Fetal Medicine	One hour lecture Beth Israel Deaconess
	Maternal-Fetal Medicine Fellows	One hour lecture
2013	Ethics at the Limits of Viability	Beth Israel Deaconess
0040	Maternal-Fetal Medicine Fellows	One hour lecture
2013	Evolving Prenatal Genetic Technologies	Beth Israel Deaconess
2013	Maternal-Fetal Medicine Fellows CMV in Pregnancy	One hour lecture
2010	Maternal-Fetal Medicine Fellows	Beth Israel Deaconess
2014	Ethics of Elective Cesarean Delivery	One hour lecture Beth Israel Deaconess
	Maternal-Fetal Medicine Fellows	One hour lecture
2014	New Genetic Technologies	Beth Israel Deaconess
	Maternal-Fetal Medicine Fellows	One hour lecture
2014	Isoimmunization	Beth Israel Deaconess
2015	Residents	One hour lecture
2015	Hypertension in Pregnancy	Beth Israel Deaconess
2015	OB Anesthesiology Fellows Pregnancy Physiology	One hour lecture
	Maternal-Fetal Medicine Fellows	Beth Israel Deaconess One hour lecture
2015	Universal Access for NIPT	Beth Israel Deaconess
	Maternal-Fetal Medicine Fellows	One hour lecture
2015	Periviable Gestations	Beth Israel Deaconess
2045	Maternal-Fetal Medicine Fellows	One hour lecture
2015	Gifts from Patients	Beth Israel Deaconess
	Maternal-Fetal Medicine Fellows	One hour lecture



Clinical Superviso	ory and Training Responsibilities:	
1994 – 1996	Supervision of Family Practice Residents	10 hours/week
	Beverly Hospital/Lynn Health Cente	r
1996 – 2011	Supervision & Training of OB residents Tufts Medical Center	6 hours/week
1996 – 2011	Supervision & Training of MFM Fellows Tufts Medical Center	8 hours/week
1996 – 2011	Supervision & Training of 3 rd year students Tufts Medical Center	6 hours/week
2006 – 2011	Supervision & Training of OB Fellows Lawrence General Hospital	2 hours/week
2007 – 2011	Interclerkship Clinical Skills Evaluation Tufts University School of Medicine	10 hours/year
2012 - present	Supervision & Training of MFM Fellows Beth Israel Deaconess Medical Cent	15 hours/week
2012 - present	Supervision & Training of OB residents Beth Israel Deaconess Medical Cent	6 hours/week

Laboratory and Other Research Supervisory at	nd Training	Responsibilities:
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	oup of the off dire ! fellill!	y nesponsibilites,
2001 – 2002	Supervision of Resident Research	One hour/wk for 6 months
2002 – 2003	Supervision of Resident Research	One hour/wk for 12 months
2003 - 2004	Supervision of Resident Research	One hour/wk for 6 months
2004 - 2005	Supervision of Resident Research	One hour/wk for 3 months
2007 - 2008	Supervision of Resident Research	
2012 - present		One hour/wk for 6 months
2012 - bieseill	Supervision of Fellow Research	One hourbuk

Formally Supervised Trainees

rormany Supe	ervised Trainees		
<u>Date</u>	Name	Level of Trainee	Activity
2000-2003	Leslie Bizovi, MD	Resident	Clinical Advisor
	Met monthly to a	discuss clinical progression in	residency and career guidance.
2001-2002	Emily Sikking, MD	Resident	Research Advisor
	Helped design a endometritis.	nd implement a research stu	dy on the treatment of postpartum
2002-2003	Deirdre Kato, MD	Resident	Research Advisor
	Continued Imple postpartum endo	mentation of above research ometritis.	study on the treatment of
2003-2004	Julie Vogel, MD	Resident	Research Advisor
	Student evaluatio	nd implement a research stud on and grading. Abstract subl Gynecology and Obstetrisc n	dy on gender disparity in medical mitted and accepted to Association
2004-2005	Josh Berger, MD <i>Helped design al</i>	Resident	Research Advisor
2004-2005	Garfield Clunie, MD Helped design ar following pregnar	Fellow nd implement a research stud ncy termination for fetal anon	Research Advisor by on evaluation of fetal karyotype halies. Abstract submitted and
	accepted to the S	Society for Maternal-Fetal Me	
2009-2011	Alon Neidich	Medical Student	Faculty Advisor F F V F JUN 0 6 2016

Faculty advisor for medical student interest group in medical ethics. Helped write and submit abstract for 2012 American Society of Bioethics and Humanities Meeting.

	weenig.		
2009-2011	Sally Green	Medical Student	Faculty Advisor
	Faculty advisor for	medical student interest gre	oup in medical ethics.
2012-2012	Michelle Silasi, MD		Program Director
	Acted as advisor fo	r final presentation for fello	wship thesis on markers of
	preeclampsia in pre	egnancies complicated by for	etal trisomy.
2012-2013	William Schnettler, MD	Fellow	Program Director
	Supervised researc	ch on factors affecting cervi	cal length measurement.
2012-2014	Melissa March, MD		
			a for gestational diabetes and a
	second project on t	he impact of cord milking o	n premature babies.
2012-2015	Kedak Baltajian, MD		
			o discuss research interests.
2013-present		Fellow	
			o discuss research interests
2014-present	Melissa Spiel, DO		
			o discuss research interests
2015-present	Bethany Mulla, MD		
			o discuss research interests
2015-present	Ai-Ris Collier, MD		
	New fellow as of Jul	ly 2015; weekly meetings to	o discuss research interests

Formal Teaching of Peers (e.g., CME and other continuing education courses): No presentations below were sponsored by outside entities

1998	Ethics of Prenatal Diagnosis (CME Conference)
	New England Medical Center
2011	Ethics in Obstetrics (CME Conference)
	Tufts Medical Center
2012	Medical Complications in Pregnancy (Internal Medicine CME Conference)
	Westin Hotel, Boston, MA
2013	Medical Complications in Pregnancy (Internal Medicine CME Conference)
	Renaissance Hotel, Boston, MA

Local Invited Presentations:

No presentations below were sponsored by outside entities

1997	Pregnancy Induced Hypertension (Grand Rounds) New England Medical Center
2003	Partial Birth Abortion (Grand Rounds)
	Tufts-New England Medical Center
2004	Ethics of Prenatal Diagnosis (Pediatric Grand Rounds)
	Tufts-New England Medical Center
2007	Ethics Issues on the OB/GYN Service (Grand Rounds)
	Tuffs-New England Medical Center



2007	Prenatal Diagnosis Emergencies (Grand Rounds)
	Tufts-New England Medical Center
2010	Health Care Reform, Abortion, and Human Rights (Grand Rounds)
	Tufts Medical Center
2011	The Blessing of the Fetus (Schwartz Rounds Panelist)
	Tufts Medical Center
2012	Cesarean Section on Demand (Grand Rounds)
	Beth Israel Deaconess Medical Center
2013	Gifts from Patients (Ethics Grand Rounds)
	Tufts-New England Medical Center
2013	Cytomegalovirus Infection
	Beth Israel Deaconess Medical Center
2013	Lupus in Pregnancy
	Beth Israel Deaconess Medical Center
2015	Lupus in Pregnancy
2016	Beth Israel Deaconess Medical Center
2010	Gifts from Patients
	Beth Israel Deaconess Medical Center

Report of Regional, National & International Invited Teaching & Presentations

Regional

No presentations below were sponsored by outside entities

1998	Pregnancy Induced Hypertension (Grand Rounds)	
1998	Lowell General Hospital Pregnancy Induced Hypertension (Grand Rounds)	
1998	St. Elizabeth's Medical Center Lupus in Pregnancy (Invited Talk)	
1998	North Shore Lupus Foundation The Effect of a Maternal Transport Population on a Tertiary Center's C/S Rate (Oral Presentation, Abstract)	>
1999	New England Perinatal Society Perinatal Infections (Grand Rounds) Beverly Hospital	
1999	Perinatal Infections (Grand Rounds) Cambridge Hospital	
2000	Screening for Aneuploidy in the First Trimester (Grand Round) Melrose-Wakefield Hospital	
2000	HSV in Pregnancy (Grand Round) Lowell General Hospital	
2000	Preconception Counseling (CME Conference) New England Medical Center	
2000	Pregnancy Induced Hypertension (Grand Rounds) Norwood Hospital	
2000	Pregnancy Induced Hypertension (CME Conference)	ם כ



	South Shore Hospital
2000	Chronic Hypertension in Pregnancy (Grand Rounds) Mount Aubum Hospital
2001	Fetal Monitoring (Grand Rounds) Lawrence General Hopsital
2002	Isoimmunization South Shore Hospital
2002	Prenatal Diagnosis: Ethical Considerations (CME Conference) Mount Auburn Hospital
2003	Hypertension in Pregnancy (Grand Rounds) Holy Family Hospital
2003	Partial Birth Abortion (Invited Talk) Medical Students for Choice, Boston, MA
2004	Postdates Pregnancy (Grand Rounds) Winchester Hospital
2004	Prenatal Diagnosis: Ethical Considerations (Grand Rounds) Boston Medical Center
2004	Down Syndrome Screening (Grand Rounds) Norwood Hospital
2005	Prenatal Diagnosis: Ethical Considerations (Grand Rounds) South Shore Hospital
2005	Down Syndrome Screening (CME Conference) Norwood Hospital
2005	Cardiac Disease in Pregnancy (Medical Grand Rounds) Holy Family Hospital
2006	Prostaglandins: Myths and Controversies (CME Conference) Mouth Auburn Hospital
2006	Ethics of Prenatal Diagnosis (Invited Speaker) Yale University School of Medicine
2006	Ethics of Prenatal Diagnosis (Grand Rounds) Mount Auburn Hospital
2006	Ethics of Prenatal Diagnosis (Invited Speaker) Medical Students for Choice, Worcester, MA
2007	Ethics of Prenatal Diagnosis (Grand Rounds) Metrowest Medical Center
2007	Ethics of Prenatal Diagnosis (Grand Rounds) Dartmouth Medical Center
	Ethics of Prenatal Diagnosis (Grand Rounds) Brigham and Women's Hospital
2007	Ethics of Prenatal Diagnosis (Grand Rounds) Emerson Hospital
2007	Ethics of Prenatal Diagnosis (Grand Rounds) St. Elizabeth's Medical Center
2007	Obstetrics Clinical Problem Solving (Grand Rounds) Lawrence General Hospital
2007	Prenatal Diagnosis Emergencies (CME Conference) Mouth Auburn Hospital
2008	Hypertension in Pregnancy (Grand Rounds) Lawrence General Hospital
2008	Prostaglandins: Myths and Controversies (Grand Rounds) North Shore Medical Center



2008	Cesarean Section on Demand (Grand Rounds)
2009	Lawrence General Hospital Abortion (Keynote Speaker)
	Medical Students for Chains, Designal Conference Designal Conferen
2009	Medical Students for Choice, Regional Conference, Boston, MA Preconception Counseling of the Obese Patient (CME Conference) Mouth Auburn Hospital
2009	Intrapartum Management of the Obese Patient (CMF Conference)
2009	Mouth Auburn Hospital Prostaglandins: Myths and Controversies (Grand Rounds)
2009	Winchester Hospital Obstetrics Clinical Problem Solving (Grand Rounds)
	Lawrence General Hospital
2010	Health Care Policy (Invited Panelist)
0010	American College of OB/GYN (MA Regional Conference)
2010	Health Care, Abortion, and Human Rights (Grand Rounds) Cambridge Health Alliance
2011	Health Care, Abortion, and Human Rights (Invited Speaker)
	Medical Students of Choice, Boston University
2011	First I rimester Screening for Down Syndrome (CMF Conference)
	Mouth Auburn Hospital
2011	Cesarean Section on Demand (CME Conference)
2044	Mouth Auburn Hospital
2011	Cesarean Section on Demand (Invited Speaker)
2011	New England OB/GYN Society
2011	Ethics of Prenatal Diagnosis (Grand Rounds)
2011	Winchester Hospital
2011	New Genetic Technologies (Grand Rounds)
2012	Cambridge Health Alliance
2012	Teaching Rare Obstetrical Procedures (CME Conference)
2013	Mouth Auburn Hospital
2010	Hypertension in Pregnancy (Grand Rounds) Mouth Auburn Hospital
2013	Disability: Prevention, Detection, Accommodation?
	Boston University School of Public Health
2014	Ethics of New Genetic Technologies
	Partners in Perinatal Health Conference
2014	Ethics of New Genetic Technologies (Grand Rounds)
	Tufts Medical Center
2014	Perinatal Infections: CMV and HSV (Grand Rounds)
	Mouth Auburn Hospital
2015	Ethics of New Genetic Technologies (Grand Rounds)
	Emerson Hospital
2015	Ethics of New Genetic Technologies (Grand Rounds)
0045	Cambridge Health Alliance
2016	Gifts from Patients (Grand Rounds)
	Mouth Auburn Hospital

Supported by Outside Entities 2013 New Gene

New Genetic Technologies: Ethical Considerations



New England Regional Genetics Group Paid Speaker for Ariosa Labs

National

No presentations below were sponsored by outside entities

2004	Prenatal Diagnosis: Ethical Considerations (Grand Rounds) University of California, San Francisco, CA
2006	Prostaglandins: Myths and Controversies (Invited Speaker) Mountain Area Health Education Center, Asheville, NC
2006	Prenatal Diagnosis: Ethical Considerations (Invited Speaker) Mountain Area Health Education Center, Asheville, NC
2007	Second Trimester Termination of Pregnancy (Panelist) National Abortion Federation, National Meeting, Boston, MA
2008	Ethics of Prenatal Diagnosis (Grand Rounds) Albert Einstein College of Medicine, New York, NY
2010	Ethics of Prenatal Diagnosis (Grand Rounds) Medical University of South Carolina, Charleston, SC
2011	Cesarean Section on Demand (Ware-Dunn Conference) Virginia Commonwealth University, Richmond, VA
2011	Ethics of Prenatal Diagnosis (Patricia Hays Lecture) Virginia Commonwealth University, Richmond, VA
2012	Evolving Prenatal Genetic Technologies Case Western Reserve
2013	Ethics at the Limits of Viability (Keynote Lecture) New England Perinatal Society, Newport RI
2013	Ethics of Prenatal Diagnosis (Keynote Speaker) Wisconsin Association for Perinatal Care
2013	Waukesha, WI The Epigenetics of Obesity (Special Interest Group) Wisconsin Association for Perinata! Care Waukesha, Wi
2014	Ethical Dilemmas in the Practice of OB/GYN and Reproductive Biology Cleveland Clinic, Cleveland, OH Guest speaker: A Primer on Ethics in OB/GYN Small Group Leader: Reimaging the Maternal-Fetal Dyad

International

No presentations below were sponsored by outside entities

Does Prenatal Diagnosis Improve Outcomes for Women Who Choose Not to Terminate Pregnancy (Oral presentation, abstract) 2000

International Society for Prenatal Diagnosis, Barcelona, Spain

Report of Clinical Activities and Innovations

Current Licensure and Certification:

1994 Massachusetts Medical License



1996	Board Certified in OB/GYN
2000	Board Certified in Maternal-Fetal Medicine

Practice Activities:

1994 - 1996	Ambulatory OB/GYN Practice	Lynn Health Center	3 days/week
1994 - 1996	Inpatient OB/GYN	Beverly Hospital	2 days/week
1998 - 2011	Inpatient and Outpatient	Tufts Medical Center	3 days/week
1998 – 2011	Maternal-Fetal Medicine Outpatient Consultations Outpatient Consultations Inpatient and Outpatient Maternal-Fetal Medicine	Lawrence General Hospital	1 day/week
2000 – 2009		Beverly Hospital	1 day/week
2012 – present		Beth Israel Deaconess	4 days/week

Clinical Innovations:

Center for Compassionate Care	Brought together a multidisciplinary group of practitioners
and Perinatal Hospice	(including obstetricians, pediatricians, nurses, social worke

(including obstetricians, pediatricians, nurses, social workers, chaplains) to deliver care to patients whose fetuses or neonates

have very poor prognoses.

Innovative technique for chorionic

villus sampling

Instituted a technique used to access the placenta more facilely when inconveniently located for routine transabdominal access.

Taught colleagues at my institution this technique.

Co-Director of the New England Center

for Placental Disorders

Headed a multidisciplinary team to streamline evaluation and And treatment services for women with abnormal placentation.

Report of Education of Patients and Service to the Community

Activities

No activities below were sponsored by outside entities

2008 - present Board Member, Planned Parenthood League of MA

2010 - present

Chair, Medical Advisory Committee, Planned Parenthood League of MA

2010 - present

Founding Member, Boston Gay Medical Faculty interest group

Goal of group is to provide role models and resources for students & residents

Educational Material for Patients and the Lay Community:

No educational materials below were sponsored by outside entities

2004 Echog	enic Focus in the Heart	Co-Author	Patient Education Pamphlet
2004 Chord	id Plexus Cysts	Co-Author	Patient Education Pamphlet
2004 Hydro	nephrosis	Co-Author	Patient Education Pamphlet
2010 Perina	ital Hospice Care	Co-Author	Patient Education Pamphlet

Recognition:

recognition,	
2005 - 2008	Best Doctors in America
2007	Top Doctors (Best of Boston)
2011	Compassionate Doctor Award
2012	Top Doctors (Best of Boston)
2013	Top Doctors (Best of Boston)
2014	Top Doctors (Best of Boston)
2015	Top Doctors (Best of Boston)



Report of Scholarship

Peer-Reviewed Publications in print or other media

Research investigations

- Thomas PA, Ralston SJ, Bernard M, Williams R, O'Donnell R. Pediatric AIDS: An Unusually High Incidence of Twinning. Pediatrics, 1990;86:(5) 774-6.
- Farina A, Sekizawa A, Ralston SJ, D'Alton ME, Bianchi DW. Latent Class Analysis Applied to Patterns of Fetal Sonographic Abnormalities: Definition of Phenotypes Associated with Aneuploidy. Prenat Diagn. 1999;Sep;19(9):840-5.
- Raiston SJ, Wertz D, Chelmow D, Craigo SD, Bianchi DW. Pregnancy Outcomes After Prenatal Diagnosis of Aneuploidy. Obstet Gynecol 2001;97:729-33.
- Samura O, Sohda S, Johnson KL, Pertl B, Ralston S, Delli-Bovi LC, Bianchi DW. Diagnosis of trisomy 21 in fetal nucleated erythrocytes from maternal blood by use of short tandem repeat sequences. Clinical Chemistry. 2001;47(9):1622-6.
- Volpe MA, Pham L, Lessin M, Ralston SJ, Bhan I, Cutz E, and Nielsen HC. Expression of Hoxb-5 during human lung development and in congenital lung malformations. Birth Defects Research (Part A) 67: 550-556 (2003).
- Luks FI, Carr SR, Plevyak M, Craigo SD, Athannasiou A, Ralston SJ, Tracy TF, Jr. Limited prognostic value of a staging system for twin-to-twin transfusion syndrome. Fetal Diagn Ther 2004;19:301-304
- Volpe MA, Chung E, Ulm P, Gilchrist BF, Ralston S, Wang KT, Nielson HC. "Aberrant Cell Adhesion Molecule Expression in Human Bronchopulmonary Sequestration and Congenital Cystic Adenomatoid Malformation" AJP-Lung Cell Mol Physiol; 2009; vol 297
- Vora NL, Johnson KL, Peter I, Tighiouart H, Ralston SJ, Craigo SD, Bianchi DW. "Circulating cell-free DNA levels increase variably following chorionic villus sampling." Prenat Diagn. 2010 Feb 2
- Rana S, Cerdeira AS, Wenger J, Salahuddin S, Lim KH, Ralston SJ, Thadhani RI, Karumanchi SA. Plasma concentrations of soluble endoglin versus standard evaluation in patients with suspected preeclampsia. PLoS One. 2012;7(10):e48259. doi: 10.1371/journal.pone.0048259. Epub 2012 Oct 26.
- Schnettler W, Dukhovny D, Wenger J, Salahuddin S, Ralston SJ, Rana S. Cost and resource implications with serum angiogenic factor estimation in the triage of pre-eclampsia BJOG 2013
- Shainker SA, Raghuraman N, Modest AM, Schnettler WT, Hacker MR, Ralston, SJ. The utility
 of midtrimester ultrasound assessment of the subcutaneous space in predicting cesarean
 would complications. The Journal of Maternal-Fetal and Neonatal Medicine. 2014.
- March MI, Modest AM, Ralston SJ, Hacker MR, Gupta M, Brown FM. The effect of adopting the IADPSG screening guidelines on the risk profile and outcomes of the gestational diabetes population. J Matern Fetal Neonatal Med 2015;

 Shainker SA, Modest AM, Hacker MR, Ralston SJ. The effect of a universal cervical length screening program on antepartum management and birth outcomes. Journal of Perinatology Reports, 2016. In press.

Reviews, chapters, monographs and editorial

- Raiston SJ, Schwaitzberg SD. "Liver hematoma and rupture in pregnancy." Semin Perinatol. 1998 Apr;22(2):141-8.
- Ralston SJ, D'Alton ME, "General Obstetrical Care" in Oski's Pediatrics: principles and practice, 1999 Lippincott Williams & Wilkins, MacMillan, DeAngelis, Feigin, & Warshaw, Editors.
- Ralston SJ and Craigo SD. "Ultrasound-Guided Procedures for Prenatal Diagnosis and Therapy" in Obstetrics and Gynecologic Clinics of North America, March 2004; 31: 101-123.
- Ralston SJ. "Herpes in Pregnancy" in "Medical Complications in Pregnancy", 2005 McGraw Hill, Craigo & Baker Editors.
- Raiston SJ, Spillman MA, Mitchell MF, Mahoney J, Joseph GF. "Obstetricians: Women's Advocates, Not Adversaries" Am J of Bioethics, 11(12): 1–3, 2011
- Ralston SJ, Leuthner S, The American Academy of Pediatrics Committee on Bioethics and the American College of Obstetricians and Gynecologist Committee on Ethics. "Maternal-Fetal Interventions and Fetal Care Centers." Pediatrics 2011;128;e473
- Ralston SJ, "Ethics of Multifetal Pregnancy Reduction" Lahey Clinic Journal of Medical Ethics Fall 2011, Vol 18, Issue 3
- 8. Fallat ME, Herweck P, Ralston SJ, "Surgical and Ethical Challenges in Disorders of Sexual Development." Advances in Pediatrics 59 (2012) 283-302
- Raiston SJ. Presenting Unwelcome Research Findings. http://virtualmentor.ama-assn.org/2014/02/ecas2-1402.html. Virtual Mentor, 2014; 16:98-102. Accessed February 5, 2014
- Raiston SJ, Farrell R. The Ethics of Access: Who is Offered a Cesarean Section and Why? Hastings Center Report, Vol 45, No 6, Nov-Dec 2015
- Johnson KM, Shainker SA, Estroff JA, Ralston SJ. Prenatal diagnosis of congenital epulis: implications for delivery. J Ultrasound Med. 2016. In press.

Letters to the Editor

 Malone FD, Ralston SJ, D'Alton ME. Increased Nuchal Translucency and Fetal Chromosomal Defects, NEJM 1998; 338 (17)

Clinical Guidelines and Reports



- ACOG Committee Opinion No. 401: Relationships with industry. American College of Obstetricians and Gynecologists Committee on Ethics. Obstet Gynecol. 2008 Mar;111(3):799-804
- ACOG Committee Opinion No. 410: Ethical issues in genetic testing. Committee on Ethics, American College of Obstetricians and Gynecologists; Committee on Genetics, American College of Obstetricians and Gynecologists. Obstet Gynecol. 2008 Jun;111(6):1495-502.
- ACOG Committee Opinion No. 409: Direct-to-consumer marketing of genetic testing. Committee on Genetics, American College of Obstetricians and Gynecologists; Committee on Ethics, American College of Obstetricians and Gynecologists. Obstet Gynecol. 2008 Jun;111(6):1493-4.
- ACOG Committee Opinion No. 422: at-risk drinking and illicit drug use: ethical issues in obstetric and gynecologic practice. American College of Obstetricians and Gynecologists. Obstet Gynecol. 2008 Dec;112(6):1449-60.
- 5. American Society for Reproductive Medicine: defining embryo donation. Ethics Committee of the American Society for Reproductive Medicine. Fertil Steril. 2009 Dec;92(6):1818-9.
- ACOG Committee Opinion No. 439: Informed consent. ACOG Committee on Ethics. Obstet Gynecol. 2009 Aug;114(2 Pt 1):401-8**
- Access to fertility treatment by gays, lesbians, and unmarried persons. Ethics Committee of the American Society for Reproductive Medicine. Fertil Steril. 2009 Oct;92(4):1190-3. Epub 2009 Sep 3. Review.
- Fertility treatment when the prognosis is very poor or futile. Ethics Committee of the American Society for Reproductive Medicine. Fertil Steril. 2009 Oct;92(4):1194-7. Epub 2009 Sep 1. Review.
- Child-rearing ability and the provision of fertility services. Ethics Committee of the American Society for Reproductive Medicine. Fertil Steril. 2009 Sep;92(3):864-7. Epub 2009 Aug 5
- Committee Opinion No. 466: ethical considerations for performing gynecologic surgery in low-resource settings abroad. Obstet Gynecol. 2010 Sep;116(3):793-9.**
- Committee Opinion No. 456: Forming a just health care system. American College of Obstetricians and Gynecologists Committee on Ethics. Obstet Gynecol. 2010 Mar;115(3):672-7.**
- Committee Opinion No. 500: Professional responsibilities in obstetric-gynecologic medical education and training. American College of Obstetricians and Gynecologists. Committee on Ethics. Obstet Gynecol. 2011 Aug;118(2 Pt 1):400-4.*
- Committee Opinion No. 480: Empathy in women's health care. American College of Obstetricians and Gynecologists Committee on Ethics. Obstet Gynecol. 2011 Mar;117(3):756-61.**

 Disclosure of medical errors involving gametes and embryos. Ethics Committee of the American Society for Reproductive Medicine. Fertil Steril. 2011 Oct 21.

- Ritual genital cutting of female minors. Committee on Bioethics, Davis DS. Pediatrics. 2010 May;125(5):1088-93. Epub 2010 Apr 26.
- Human immunodeficiency virus and infertility treatment. Ethics Committee of the American Society for Reproductive Medicine. Fertil Sterii. 2010 Jun;94(1):11-5. Epub 2010 Mar 16.
- Consent for emergency medical services for children and adolescents. Committee on Pediatric Emergency Medicine and Committee on Bioethics. Pediatrics. 2011 Aug;128(2):427-33. Epub 2011 Jul 25.
- Committee Opinion No. 501: Maternal-fetal intervention and fetal care centers. American College of Obstetricians and Gynecologists. Committee on Ethics; American Academy of Pediatrics. Committee on Bioethics. Obstet Gynecol. 2011 Aug;118(2 Pt 1):405-10.*

The above were all developed through my activities on the Committee on Ethics for the American College of Obstetricians and Gynecologists, the Committee on Bioethics of the American Academy of Pediatrics, and the Ethics Committee of the American Society of Reproductive Medicine. These guidelines are used as references for clinicians. My involvement ranged from authorship to editing. An asterix(*) indicates opinions on which I am the primary author. A double asterix (**) indicates opinion on which I served as senior author in my role as Chair of the Committee.

Abstracts, Poster Presentations and Exhibits Presented at Professional Meetings (last 3 years):

- Mukland-Cerro I, Carcia-Moliner M, Ralston SJ, Cowen J. "P57 and Ploidy in Placental Mesenchymal Dysplasia, a Mimicker of Hydatidiform Mole." College of American Pathologists, 2011
- Vogel J, Ralston SJ, Strosnitter W. "Gender Bias in Medical Student Evaluation" Association of Profressors of Gynecology and Obstetrics, 2008
- March MI, Hacker MR, Merport Modest A, Gupta M, Raiston SJ, Brown FM. Early Adopters: The BIDMC experience with the new IADPSG guidelines for GDM. Accepted for poster presentation at the 7th International DIP Symposium - Diabetes, Hypertension, Metabolic Syndrome & Pregnancy: March, 2013 in Florence, Italy
- March MI, Merport Modest A, Gupta M, Raiston SJ, Brown FM. Does a change in screening guidelines change the risk profile and outcomes of the gestational diabetes population? Poster Presentation, 34th Annual meeting of SMFM, New Orleans, LA, Feb. 3-8, 2014.
- Shainker SA, Raghuraman N, Modest AM, Schnettler WT, Hacker MR, Ralston, SJ. The utility of midtrimester ultrasound assessment of the subcutaneous space in predicting cesarean would complications. New England Perinatal Society, Newport, Rhode Island, March 2014
- 6. Shainker SA, Modest AM, Hacker MR, Raiston SJ. The effect of a routine cervice length screening program on antepartum management and birth outcomes. 2015. Presented at

an oral presentation at the annual meeting of the New England Perinatal Society, Newport, RI

 Ralston SJ. Universal Access for NIPT. International Society for Prenatal Diagnosis, July 2015, Washington, DC

Narrative Report

I see myself as a caregiver, scientist, and educator. I spend approximately 50% of my time providing oversight to clinical programs and directing clinical care, and the remaining 50% is divided between work on ethics and teaching. I entered medicine with a firm foundation in the scientific method and natural curiosity about human disease, medicine in society, and social change. My most formative experience in medical school was in a refugee camp on the Thai/Cambodian border, in a fellowship to teach medical students about health care delivery in regions of the world suffering political strife. In this resource deplete environment, I saw human suffering and a nobility of purpose on the part of providers that has made me the clinician I am today.

Obstetrics was my great love, and during my fellowship, I participated in a series sponsored by the ELSI (Ethics, Law, and Social Implications) branch of the Human Genome Project to address the ethics of prenatal diagnosis. This catalyzed my longstanding interest in medical ethics. I went on to develop a medical ethics curriculum at Tufts, creating and directing the Ethics and Professionalism course, serving as lecturer, group facilitator, and curriculum director. I buttressed this interest by pursuing an MPH with a concentration in Health Law, Bioethics, and Human Rights. This culminated my participation on the national level in the ACOG Ethics Committee since 2006, and as chair of this committee in 2009-2012. Some of my greatest contributions are the Committee Opinions published during my tenure as Chair.

My clinical expertise is in prenatal diagnosis and high-risk obstetrics. I developed consultative programs in numerous hospitals in the community and have been the medical director of the Tufts Center for Perinatal Diagnosis from 2006-2011. I was also instrumental in forming the Tufts Center for Compassionate Care and Perinatal Hospice, which helps women and families whose fetuses or children have extremely poor prognoses.

My role as an educator has traversed all tiers of medical education ranging from students to residents to fellows to faculty, and has intertwined my clinical expertise in prenatal diagnosis and high-risk obstetrics with my work on ethics. I have facilitated small groups of 1st and 2nd year medical students in problem-based learning, I have lectured in medical ethics and pregnancy pathophysiology, I directed the 3nd year clerkship in OB/GYN at Tufts for over a decade, and I have mentored both residents in OBGYN and fellows. My work in ethics has afforded me the opportunity to teach faculty throughout the country, and to help set the standards for ethical practice in reproductive medicine and pediatrics. I have gamered numerous teaching awards, and believed that to engage learners at any level, you need to show them why you find your subject compelling and to show them passion for what you do.

My career has afforded me opportunities to help individual women, while as an advocate for women's health I have been fortunate to be able to participate nationally with organizations whose scope reaches well beyond the individual clinics and labor floors. The social and economic disparities between the sexes continue to be huge hurdles in women's ability to receive adequate care throughout the world.







PRACTITIONER PROFILE

Prepared for:

Pennsylvania State Board of Medicine

As of Date:6/29/2016

PRACTITIONER INFORMATION

Name:

Steven Joseph Ralston

DOB:

5/13/1963

Medical School:

Columbia University College of Physicians & Surgeons

New York, New York, UNITED STATES

Year of Grad:

1990

Degree Type:

MD

NPI:

1003870015

BOARD ACTIONS

To date, there have been no actions reported to the FSMB

LICENSE HISTORY

Jurisdiction

MASSACHUSETTS

PENNSYLVANIA **SOUTH CAROLINA** License Number Issue Date

79380 MD051583L 5/4/1994 10/12/1993 **Expiration Date** 5/13/2017

Last Updated 6/7/2016

8/9/2013

LLTL34488 6/18/2012

6/30/2012

6/6/2016





PRACTITIONER PROFILE

Prepared for:

Pennsylvania State Board of Medicine

As of Date:6/29/2016

Practitioner Name:

Steven Joseph Raiston

ABMS® CERTIFICATION HISTORY

Certifying Board:

American Board of Obstetrics and Gynecology

Certificate:

Obstetrics and Gynecology

Certification Type:

General

Certification Status: Meeting MOC Requirements: Certified Yes

Status	Duration	Effective Date	Expiration Date	Reverification Date	Occurrence	Last Reported
Active	Time Limited	12/31/2015	12/31/2016		Recertification	5/26/2016
Expired	Time Limited	12/31/2014	12/31/2015		Recertification	5/26/2016
Expired	Time Limited	12/16/2013	12/31/2014		Recertification	5/26/2016
Expired	Time Limited	12/15/2012	12/31/2013		Recertification	5/26/2016
Expired	Time Limited	06/26/2006	12/31/2012		Recertification	5/26/2016
Expired	Time Limited	11/15/1996	12/31/2006		Initial	5/26/2016

Certifying Board:

American Board of Obstetrics and Gynecology

Certificate:

Matemal-Fetal Medicine

Certification Type:

Subspecialty

Certification Status:

Certified

Meeting MOC Requirements:

Yes

Status	Duration	Effective Date	Expiration Date	Reverification Date	Occurrence	Last Reported
Active	Time Limited	12/31/2015	12/31/2016		Recertification	5/26/2016
Expired	Time Limited	12/31/2014	12/31/2015		Recertification	5/26/2016
Expired	Time Limited	12/16/2013	12/31/2014		Recertification	5/26/2016
Expired	Time Limited	12/15/2012	12/31/2013		Recertification	5/26/2016
Expired	Time Limited	06/26/2006	12/31/2012		Recertification	5/26/2016
Expired	Time Limited	04/12/2000	12/31/2006		Initial	5/26/2016

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COMMONWEALTH OF PENNSYLVANIA
STATE BOARD OF MEDICINE
P. O. BOX 2649
HARRISBURG, PENNSYLVANIA 17105
at-medicine@pa.gov
www.dos.pa.gov/med
June 29, 2016

STEVEN JOSEPH RALSTON 9849

BOSTON MA 02118

Telephone: 717-783-1400/787-2381 Fax: 717-787-7769

EVALUATOR: LORI

Dear Doctor:

RE:

The Board has received your status change/reactivation application. The items listed below are needed to complete your application. Your license cannot be changed/reactivated until all items are received, approved and the application is complete. You may not practice in the Commonwealth of Pennsylvania as a Physician and Surgeon until your license has been reinstated by the Board.

DISCREPANCY NOTICE - Status Change/Reactivation Application - Physician

- > Curriculum Vitae
 - Needs resubmitted in month/year format.
- Per Act 31 of 2014, two (2) hours of Board approved continuing education in child abuse recognition and reporting requirements must be completed prior to your license being reinstated. Details can be found at www.dos.pa.gov. For a list of Board-approved providers click the "Act 31 Mandated Child Abuse Reporter Training" link. Verification of completion must be sent electronically and directly from the course provider. Please note that it may take up to 7 days for the provider to submit the records to our office.

PLEASE NOTE: Act 31 of 2014 applies to all health-related licensees, regardless of whether they are subject to any other continuing education requirements of the Board.

NOTE: PLEASE RETURN A COPY OF THIS LETTER WITH THE INFORMATION AND DOCUMENTS REQUESTED.

Person Info Name:STEVEN JOSEPH RALSTON Address Info	•
Street Address	Email: gmail.com
Phone	
Fax	
CityPhiladelphia	
StatePA	
Zipcode19107	
Country82	
CountyPhiladelphia	

Are you submitting a name change with this renewal?	N
Have you completed your current CE requirements?	Y
Do you hold, or have you ever held, a license, certificate, permit, registration or other authorization to practice any health-related profession in any state or jurisdiction?	Y
If you answered yes to the above question, please provide the profession and state or jurisdiction.	MD Massachusetts
Since your initial application or last renewal, whichever is later, have you had disciplinary action taken against a professional or occupational license, certificate, permit, registration or other authorization to practice a profession or occupation issued to you in any state or jurisdiction of have you agreed to voluntary surrender in lieu of discipline?	N
Do you currently have any disciplinary charges pending against your professional or occupational license, certificate, permit or registration in any state or jurisdiction?	N
Since your initial application or last renewal, whichever is later, have you withdrawn an application for a professional or occupational license, certificate, permit or registration, had an application denied or refused, or for disciplinary reasons agreed not to apply or reapply for a professional or occupational license, certificate, permit or registration in any state or jurisdiction?	N
Since your initial application or last renewal, whichever is later, have you been convicted (found guilty, pled guilty or pled nolo contendere), received probation without verdict or accelerated rehabilitative disposition (ARD), as to any criminal charges, felony or misdemeanor, including any drug law violations? Note: You are not required to disclose any ARD or other criminal matter that has been expunged by order of a court.	N
Do you currently have any criminal charges pending and unresolved in any state or jurisdiction	N
Since your initial application or last renewal, whichever is later, have you had your DEA registration denied, revoked or restricted?	N
Since your initial application or your last renewal, whichever is later, have you had provider privileges denied, revoked, suspended or restricted by a Medical Assistance agency, Medicare, third party payor or another authority?	N
Since your initial application or your last renewal, whichever is later, have you ever had practice privileges denied, revoked, suspended, or restricted by a hospital or any health care acility?	N
Since your initial application or your last renewal, whichever is later, have you been charged by hospital, university, or research facility with violating research protocols, falsifying research, or engaging in other research misconduct?	N
Since your initial application or last renewal, whichever is later, have you engaged in the intemperate or habitual use or abuse of alcohol or narcotics, hallucinogenics or other drugs or substances that may impair judgment or coordination?	
ince your initial application or your last renewal, whichever is later, have you been the subject facivil malpractice lawsuit?	N
f yes, please submit a copy of the entire Civil Complaint, which must include the filing date and ne date you were served. PLEASE NOTE: If you previously reported the complaint to the loard you will only need to provide the docket number here:	
lave you completed 2 hours of Board-approved continuing education in child abuse ecognition and reporting?	Y
to you maintain current medical professional liability insurance in the Commonwealth of ennsylvania?	Y
you answer "No", please provide an explanation or reason for an exemption request.	
lease provide the zip code of your primary employer/practice location. This data is being ollected for the purpose of identifying healthcare professionals during state emergencies and hay be provided to the Pennsylvania Emergency Management Agency for official use only.	19107

Date Submitted:

Wednesday, November 09, 2016

Education Info

No education records

Employment Information

myLicense Renewal Question Responses

License Number: MD051583L

Name: STEVEN JOSEPH RALSTON

Online Submission Date:

Renewal Question	Response
Are you submitting a name change with this renewal?	N
Since your last renewal, has a licensing jurisdiction taken any disciplinary action against you?	Ň
Since your last renewal, have you been convicted of a crime?	N
Since your last renewal, have you withdrawn an application for licensure in another licensing juristiction?	N
Since your last renewal, have your provider privileges been terminated by any medical assistance agency for cause?	N
Since your last renewal, have you had practice privileges denied, revoked or restricted in a hospital or health care facility?	N
Since your last renewal, have you had your DEA registration denied, revoked or restricted?	N
Do you maintain current medical professional liability insurance in the Commonwealth?	Y
Medical Renewal - Since your last renewal, have you been the subject of a civil malpractice law suit?	Ņ
Please provide the profession and state or jurisdiction.	MD
Are you, or have you ever been addicted to the intemperate use of alcohol or to the habitual use of narcotics or other habit-forming drugs? (NOTE: You may answer "NO" if you are currently a participant in or have successfully completed the requireme	MID
Do you currently have any disciplinary charges pending against your professional or occupation license, certificate, permit or registration in any state or jurisdiction?	N
Do you currently have any criminal charges pending and unresolved in any state or jurisdiction?	N
Since your initial application or your last renewal, whichever is later, have you been charged by a hospital, university, or research facility with violating research protocols, falsifying research, or engaging in other research misconduct?	N
If yes, please submit a copy of the entire Civil Complaint, which must include the filing date and the date you were served. PLEASE NOTE: If you previously reported the complaint to the Board you will only need to provide the docket number here:	0
If you answer "No", please provide an explanation or reason for an exemption request.	0
Have you completed 2 hours of Board-approved continuing education in child abuse recognition and reporting?	Y
Do you hold, or have you ever held, a license, certificate, permit, registration or other authorization to practice any health-related profession in any state or jurisdiction?	Υ
Have you completed your current CE requirements?	Υ
Please provide the zip code of your primary employer/practice location. This data is being collected for the purpose of identifying healthcare professionals during state emergencies and may be provided to the Pennsylvania Emergency Management Agency for official use only.	19107