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August 27, 1996

RE : MANANDHA, SHEELA Tufts P484192973 02 Ref#: 0107122-10/15/70 Ob ultrasound scan

? Growth

Examination of the uterus revealed a single active fetus in breech position. The placenta was posterior. regular fetal heartbeat. The fetal lateral ventricles, posterior fossa and cerebellum appeared normal. The spine, stomach, kidneys, urinary bladder, the four chambers of the heart and the fetal cord insertion site appeared intact. In addition, the evaluation of the great vessels, face and extremities was unremarkable for gestational age. The amniotic fluid volume was mormal. Fetal activity was present.

BD 41, Fem 30, corresponding to approximately 19 weeks.

DON'T WAR DISCUSS

Bryann Bromley, M.D.

BB/klc

An 196 - 1/21/27

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THE MALDEN HOSPITAL Maiden, Massachusetts

dealth History Summary Date: 6/20/96



HOLLISTER maternal/newborn RECORD SYSTEM ATIENT IDENTIFICATION

Sheela manandhar Patient's name Home address

62	A WILLOU	u Ale	# 3	
Son	nervill	STREET		Oa
Marital status	Married	Years X	848	YS Ur
	Work		Home	Home

26 Date of Hor Back of Hace or Nepalese Religion Budhist Marital Me	wried X84 Education Ur
cial Security 022-78-374 Occupation Homemoter Work	Home Home
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terring of Outline Attending On Lace Lace Lace Lace Lace Lace Lace Lace	OPTIONAL FOR INCHANCE ETC
bysician D(QUINTERO physician Princes In Women's Lloth	
edical History Check and detail positive findings including date and place and place of the state of the stat	e of Preexisting Risk Guide
Congenital anomalies	Indicates pregnancy/outcome at
Genetic diseases	31. □ Age < 15 or > 35
Multiple births	32. □ < 8th grade education
Diabetes mellitus Bay Bank Malignancies Systems engineer	33. Cardiac disease (class I or
1,130,000,000,000,000,000,000,000,000,00	35. ☐ Chronic pulmonary disease 36. ☐ Thrombophlebitis
Rheumatic fever	37. □ Endocrinopathy
Pulmonary disease	38. □ Epilepsy (on medication)
GI problems	39. ☐ Infertility (treated)
Renal disease	40. 2 abortions (spontaneous/i
Abnormal uterine bleeding	41. □ ≥ 7 deliveries 42. □ Previous preterm cr SGA in
Abnormal uterine bleeding	43. ☐ Infants ≥ 4,000 gms
Venereal disease h/o HIVES - takes hydroxyzin	44. □ Isoimmunization (ABO, etc
Phlebitis, varicosities	45. ☐ Hemorrhage during previou
Neurologic disorders Chi ortrinator	46. ☐ Previous preeclampsia
Metabol./endocrine disorders	47. Surgically scarred uterus
Anemia/hemoglobinopathy	48. ☐ Preg. without familial supports 49. ☐ Second pregnancy in 12 mc
Blood disorders OTB test by Soundra	50. ☐ Smoking (≥1 pack per day
Blood disorders Drug abuse Drug a	51.0
rare Ci scenatte use	52. 🗆
Operations/assistants	53. 🗆
Allergies/meds sensitivity	Indicates pregnancy/outcome at
	54. □ Age ≥ 40
Other hospitalizations	55. Diabetes mellitus
	56. ☐ Hypertension 57. ☐ Cardiac disease (class III or
Notice of the march 1996	
No known disease/problems aidn't like 2° felt drows	59. ☐ Congenital/chromosomal a
Cycle Length Amount	60. ☐ Hemoglobipopathies
1340 age d. 31 days 30 days Stratt p	or. La isolimilamization (hill)
gnancy History Grav Term Pret Abort Live 6 1/1904977	62. ☐ Alcohol or drug abuse 63. ☐ Habitual abortions
Onth/ Weight Wks Hrs. Type of Details of delivery: Include anesthesia	64. 🗆 Incompetent cervix
year o at birth gest. In delivery under and maternal or newborn complications. Use Risk Guide numbers where applicable.	65. ☐ Prior fetal or neonatal death
Prima gravida.	66. □ Prior neurologically damage
	67. □ Significant social problems
	68. 🗆
	70. 🗆
	Historical Risk Status
	71. No risk factors noted
	72. At risk
	73. 🗆 At high risk
	Signature A
lister.,	1 1-Hanson
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labor process. Among other things, a monitor is applied to allow for timely intervention in the event a fetus shows signs of stress and/or distress during the labor process.

On January 26, 1997, at approximately 7:15 A.M., Sheela went into the first stage of labor when her membranes spontaneously ruptured. During the first stage of labor, the cervix is expected to progressively efface and dilate allowing the fetus to advance down the birth canal. The hospital records reflect that labor progressed throughout the day. The records also reflect that Pitocin, a drug intended to augment the labor progress, was used.

At 6:10 P.M., Sheela entered the critical second stage of labor when she reached full cervical dilation. The second stage of labor is when the mother begins pushing the baby out. Defendants Maria Bueche and Rita Dawson were responsible for nursing care during this second stage.

Sheela continued to push for 1 hour and 40 minutes before Defendant Hanson noted at 7:50 P.M. that she was having a "hard time pushing" and was "too tired." The fetal vertex was reportedly at +3 station. Defendant Hanson then decided to perform a "vacuum assisted vaginal delivery." A suction cup is applied to the fetal scalp and then traction is applied with sufficient force so that the head can be pulled through the birth canal.

At 8:04 P.M., Pitocin was restarted and the vacuum was placed on the fetal head for the first time. Pulling efforts began at approximately 8:10 P.M. This first vacuum attempt remained on for approximately 27 minutes, from 8:10 P.M. until 8:37 P.M. During this attempt, the external fetal heart monitor strips were of poor quality, non-interpretable and non-reassuring with intermittent episodes of the fetal tachycardia (170-180).

At 8:45 P.M., the vacuum was reapplied for a second time and was removed 10 minutes later at 8:55 P.M. The fetal heart monitor strips were still of poor quality and still non-reassuring

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with intermittent tachycardia of between 160-180. For the first time, Dr. Hanson reported caput at +4 station.

During this time, Binay asked Dr. Hanson to perform a C-Section. Despite this request, Dr. Hanson proceeded with a third application of the vacuum at 9:15 P.M. which was ultimately removed 7 minutes later at 9:22 P.M. Pitocin was also increased during this time. The fetal heart monitor strips continued to be of poor quality and non-reassuring with a range of 160-170 noted.

In total, over 1 hour and 18 minutes had elapsed from the time the vacuum was first applied at 8:04 P.M. until it was finally discontinued at 9:22 P.M. Throughout this time, the fetal heart rate was non-reassuring.

By 10:05 P.M., Dr. Hanson finally concluded that the fetal head was unable to move past Sheela's narrow pelvic structure, a medical condition known as cephalopelvic disproportion. Baby Sarena was finally delivered by C-Section at 10:59 P.M., approximately 1 hour and 37 minutes after the last failed vacuum attempt ended at 9:22 P.M and almost five (5) hours after Sheela had entered the second stage of labor..

Sarena was born with bilateral cephalhematomas along with marked molding of her head and caput, all signs that Sarena was having a very difficult time going through the birth canal. Dr. Doupe, the pediatrician at Defendant Malden Hospital who first examined Sarena, attributed her condition to the prolonged stress of a difficult labor. Sarena's neurologist, Dr. Adre DuPlessis, has corroborated these findings and believes that she suffers from brain damage attributable to hypoxic ischemic injury during the labor process.

Presently, minor Plaintiff Sarena Manandhar has permanent brain damage which severely affects her cognitive and motor ability. Sarena has global developmental delays, seizures, spastic