

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, SS.

SUPERIOR COURT
CIVIL ACTION
NO.

16 • 756

RYAN CLOSE, PPA CHRISTINA BENSON,
Plaintiff,

V.
DYANNE TAPPIN, M.D.,
SHARON PATERWIC, R.N.,
TIMOTHY JAMES LEPORE, M.D., AND
MOHAMMED AHMED, M.D.,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

OCT 13 2016

[Signature]
CLERK OF COURTS

COMPLAINT

Count I.

1. The plaintiff, Ryan Close, is a minor who brings this action through his Mother and next friend, Christina Benson, a resident of Belchertown, MA, Hampshire County, Massachusetts.
2. The defendant, Dyanne Tappin, M.D., was at all times relevant to this complaint a physician licensed to practice her profession in the Commonwealth of Massachusetts.
3. At all times relevant to this complaint, the defendant, Dyanne Tappin, M.D., represented and held herself out to be a physician, skilled in the treatment of various illnesses and conditions and, in particular, represented to the minor plaintiff's parents that she was knowledgeable, competent, and qualified to diagnose and treat the minor plaintiff and his mother on or about 2/23/12.
4. On or about 2/23/12, the minor plaintiff's mother submitted herself and the minor plaintiff to the care and treatment of the defendant, Dyanne Tappin, M.D., who negligently, carelessly, and without regard for the minor plaintiff's and his mother's health and well being, treated the minor plaintiff and his mother in a manner resulting in the minor plaintiff's severe personal injuries.
5. The injuries sustained by the minor plaintiff, Ryan Close, were the direct and proximate result of the carelessness, unskillfulness, negligence and improper care and treatment by the defendant, Dyanne Tappin, M.D., including, but not limited to the following:
 - a. Defendant's misrepresentations to the minor plaintiff's parents that she was knowledgeable, skillful, and competent to diagnose and treat the minor plaintiff and his mother on or about 2/23/12;

No. of Pmts. One
 Fee Paid - \$ 210 Cash Check
 Surcharge Paid - \$ 15 Cash Check
 Security Fee - Paid - \$ 20 Cash Check
 Received by J.W.

- b. Defendant's failure to adequately and properly diagnose the minor plaintiff's and his mother's medical condition on or about 2/23/12, and her failure to prescribe proper and timely treatment for said condition;
 - c. Defendant's failure to recognize, or have the knowledge to recognize her inability and lack of skill to diagnose and treat the minor plaintiff and his mother, when the defendant knew or should have known in the exercise of due care, the foreseeable consequences of her inability and failure to properly and skillfully provide the minor plaintiff and his mother with acceptable medical and diagnostic services;
 - d. Defendant's failure to possess or negligent failure to exercise that degree of skill, training, and care as is possessed and exercised by average qualified members of the medical profession practicing her specialty; and
 - e. Defendant's failure to inform and to warn of the risks involved in or associated with the minor plaintiff's and his mother's condition and failure to inform and to warn about the treatment of said condition.
6. As a direct and proximate result of the negligence, carelessness, and unskillfulness of the defendant, Dyanne Tappin, M.D., the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Dyanne Tappin, M.D., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count II.

1. The minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, repeats and reavers fully herein Paragraphs One through Six of Count I of this complaint as if each were set forth here in its entirety.
2. On or about 2/23/12, the defendant, Dyanne Tappin, M.D., contracted with the minor plaintiff's parents to provide professional services related to the minor plaintiff's and his mother's medical care and treatment.
3. The defendant, Dyanne Tappin, M.D., expressly and impliedly warranted to the minor plaintiff's parents that she would perform and render said professional services in accordance with accepted standards for the practice of medicine, and that she would possess and exercise that degree of skill and care possessed and exercised by the average qualified members of the medical profession practicing her specialty.
4. On or about 2/23/12, the defendant, Dyanne Tappin, M.D., breached 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 medical profession practicing her specialty.

5. As a direct and proximate result of the defendant, Dyanne Tappin, M.D.'s breach of express and implied warranties, the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Dyanne Tappin, M.D., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count III.

1. The minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, repeats and reavers fully herein Paragraphs One through Six of Count I and Paragraphs One through Five of Count II of this complaint as if each were set forth here in its entirety.
2. On or about 2/23/12, average qualified members of the medical profession practicing the defendant's specialty knew or should have known of the risks, potential consequences and alternatives to the defendant's choice of treatment of the minor plaintiff and his mother.
3. On or about 2/23/12, the defendant, Dyanne Tappin, M.D., knew or should have known of the risks, potential consequences and alternatives to the defendant's choice of treatment of the minor plaintiff and his mother.
4. On or about 2/23/12, the defendant, Dyanne Tappin, M.D., did not inform the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's choice of treatment of the minor plaintiff and his mother.
5. If the defendant, Dyanne Tappin, M.D., had informed the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's choice of treatment of the minor plaintiff and his mother, neither the minor plaintiff's parents nor a reasonable person in their position would have elected the defendant's choice of treatment.
6. The alternatives to and the risks and potential consequences of the defendant's choice of treatment were material to a decision by the minor plaintiff's parents and a reasonable person in their position as to whether to undergo the defendant's choice of treatment.
7. As a direct and proximate result of the defendant, Dyanne Tappin, M.D.'s failure to inform the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's treatment, the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Dyanne Tappin, M.D., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count IV.

1. The plaintiff, Ryan Close, is a minor who brings this action through his Mother and next friend, Christina Benson, a resident of Belchertown, MA, Hampshire County, Massachusetts.
2. The defendant, Sharon Paterwic, R.N., was at all times relevant to this complaint a nurse licensed to practice her profession in the Commonwealth of Massachusetts.
3. At all times relevant to this complaint, the defendant, Sharon Paterwic, R.N., represented and held herself out to be a nurse, skilled in the treatment of various illnesses and conditions and, in particular, represented to the minor plaintiff's parents that she was knowledgeable, competent, and qualified to diagnose and treat the minor plaintiff and his mother on or about 2/23/12.
4. On or about 2/23/12, the minor plaintiff's mother submitted herself and the minor plaintiff to the care and treatment of the defendant, Sharon Paterwic, R.N., who negligently, carelessly, and without regard for the minor plaintiff's and his mother's health and well being, treated the minor plaintiff and his mother in a manner resulting in the minor plaintiff's severe personal injuries.
5. The injuries sustained by the minor plaintiff, Ryan Close, were the direct and proximate result of the carelessness, unskillfulness, negligence and improper care and treatment by the defendant, Sharon Paterwic, R.N., including, but not limited to the following:
 - a. Defendant's misrepresentations to the minor plaintiff's parents that she was knowledgeable, skillful, and competent to diagnose and treat the minor plaintiff and his mother on or about 2/23/12;
 - b. Defendant's failure to adequately and properly diagnose the minor plaintiff's and his mother's medical condition on or about 2/23/12, and her failure to prescribe proper and timely treatment for said condition;
 - c. Defendant's failure to recognize, or have the knowledge to recognize her inability and lack of skill to diagnose and treat the minor plaintiff and his mother, when the defendant knew or should have known in the exercise of due care, the foreseeable consequences of her inability and failure to properly and skillfully provide the minor plaintiff and his mother with acceptable nursing services;
 - d. Defendant's failure to possess or negligent failure to exercise that degree of skill, training, and care as is possessed and exercised by average qualified members of the nursing profession practicing her specialty; and

- e. Defendant's failure to inform and to warn of the risks involved in or associated with the minor plaintiff's and his mother's condition and failure to inform and to warn about the treatment of said condition.
6. As a direct and proximate result of the negligence, carelessness, and unskillfulness of the defendant, Sharon Paterwic, R.N., the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Sharon Paterwic, R.N., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count V.

1. The minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, repeats and reavers fully herein Paragraphs One through Six of Count IV of this complaint as if each were set forth here in its entirety.
2. On or about 2/23/12, the defendant, Sharon Paterwic, R.N., contracted with the minor plaintiff's parents to provide professional services related to the minor plaintiff's and his mother's nursing care and treatment.
3. The defendant, Sharon Paterwic, R.N., expressly and impliedly warranted to the minor plaintiff's parents that she would perform and render said professional services in accordance with accepted standards for the practice of nursing, and that she would possess and exercise that degree of skill and care possessed and exercised by the average qualified members of the nursing profession practicing her specialty.
4. On or about 2/23/12, the defendant, Sharon Paterwic, R.N., breached her express and implied warranties by failing to perform and render professional services in accordance with accepted standards for the practice of nursing, 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 her specialty.
5. As a direct and proximate result of the defendant, Sharon Paterwic, R.N.'s breach of express and implied warranties, the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Sharon Paterwic, R.N., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count VI.

1. The minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, repeats and reavers fully herein Paragraphs One through Six of Count IV and Paragraphs One through Five of Count V of this complaint as if each were set forth here in its entirety.
2. On or about 2/23/12, average qualified members of the nursing profession practicing the defendant's specialty knew or should have known of the risks, potential consequences and alternatives to the defendant's choice of treatment of the minor plaintiff and his mother.
3. On or about 2/23/12, the defendant, Sharon Paterwic, R.N., knew or should have known of the risks, potential consequences and alternatives to the defendant's choice of treatment of the minor plaintiff and his mother.
4. On or about 2/23/12, the defendant, Sharon Paterwic, R.N., did not inform the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's choice of treatment of the minor plaintiff and his mother.
5. If the defendant, Sharon Paterwic, R.N., had informed the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's choice of treatment of the minor plaintiff and his mother, neither the minor plaintiff's parents nor a reasonable person in their position would have elected the defendant's choice of treatment.
6. The alternatives to and the risks and potential consequences of the defendant's choice of treatment were material to a decision by the minor plaintiff's parents and a reasonable person in their position as to whether to undergo the defendant's choice of treatment.
7. As a direct and proximate result of the defendant, Sharon Paterwic, R.N.'s failure to inform the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's treatment, the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Sharon Paterwic, R.N., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count VII.

1. The plaintiff, Ryan Close, is a minor who brings this action through his Mother and next friend, Christina Benson, a resident of Belchertown, MA, Hampshire County, Massachusetts.

2. The defendant, Timothy James Lepore, M.D., was at all times relevant to this complaint a physician licensed to practice his profession in the Commonwealth of Massachusetts.
3. At all times relevant to this complaint, the defendant, Timothy James Lepore, M.D., represented and held himself out to be a physician, skilled in the treatment of various illnesses and conditions and, in particular, represented to the minor plaintiff's parents that he was knowledgeable, competent, and qualified to diagnose and treat the minor plaintiff and his mother on or about 2/23/12.
4. On or about 2/23/12, the minor plaintiff's mother submitted herself and the minor plaintiff to the care and treatment of the defendant, Timothy James Lepore, M.D., who negligently, carelessly, and without regard for the minor plaintiff's and his mother's health and well being, treated the minor plaintiff and his mother in a manner resulting in the minor plaintiff's severe personal injuries.
5. The injuries sustained by the minor plaintiff, Ryan Close, were the direct and proximate result of the carelessness, unskillfulness, negligence and improper care and treatment by the defendant, Timothy James Lepore, M.D., including, but not limited to the following:
 - a. Defendant's misrepresentations to the minor plaintiff's parents that he was knowledgeable, skillful, and competent to diagnose and treat the minor plaintiff and his mother on or about 2/23/12;
 - b. Defendant's failure to adequately and properly diagnose the minor plaintiff's and his mother's medical condition on or about 2/23/12, and his failure to prescribe proper and timely treatment for said condition;
 - c. Defendant's failure to recognize, or have the knowledge to recognize his inability and lack of skill to diagnose and treat the minor plaintiff and his mother, when the defendant knew or should have known in the exercise of due care, the foreseeable consequences of his inability and failure to properly and skillfully provide the minor plaintiff and his mother with acceptable medical and diagnostic services;
 - d. Defendant's failure to possess or negligent failure to exercise that degree of skill, training, and care as is possessed and exercised by average qualified members of the medical profession practicing his specialty; and
 - e. Defendant's failure to inform and to warn of the risks involved in or associated with the minor plaintiff's and his mother's condition and failure to inform and to warn about the treatment of said condition.
6. As a direct and proximate result of the negligence, carelessness, and unskillfulness of the defendant, Timothy James Lepore, M.D., the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Timothy James Lepore, M.D., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count VIII.

1. The minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, repeats and reavers fully herein Paragraphs One through Six of Count VII of this complaint as if each were set forth here in its entirety.
2. On or about 2/23/12, the defendant, Timothy James Lepore, M.D., contracted with the minor plaintiff's parents to provide professional services related to the minor plaintiff's and his mother's medical care and treatment.
3. The defendant, Timothy James Lepore, M.D., expressly and impliedly warranted to the minor plaintiff's parents 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 his specialty.
4. On or about 2/23/12, the defendant, Timothy James Lepore, M.D., 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 his specialty.
5. As a direct and proximate result of the defendant, Timothy James Lepore, M.D.'s breach of express and implied warranties, the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Timothy James Lepore, M.D., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count IX.

1. The minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, repeats and reavers fully herein Paragraphs One through Six of Count VII and Paragraphs One through Five of Count VIII of this complaint as if each were set forth here in its entirety.
2. On or about 2/23/12, average qualified members of the medical profession practicing the defendant's specialty knew or should have known of the risks, potential consequences and alternatives to the defendant's choice of treatment of the minor plaintiff and his mother.

3. On or about 2/23/12, the defendant, Timothy James Lepore, M.D., knew or should have known of the risks, potential consequences and alternatives to the defendant's choice of treatment of the minor plaintiff and his mother.
4. On or about 2/23/12, the defendant, Timothy James Lepore, M.D., did not inform the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's choice of treatment of the minor plaintiff and his mother.
5. If the defendant, Timothy James Lepore, M.D., had informed the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's choice of treatment of the minor plaintiff and his mother, neither the minor plaintiff's parents nor a reasonable person in their position would have elected the defendant's choice of treatment.
6. The alternatives to and the risks and potential consequences of the defendant's choice of treatment were material to a decision by the minor plaintiff's parents and a reasonable person in their position as to whether to undergo the defendant's choice of treatment.
7. As a direct and proximate result of the defendant, Timothy James Lepore, M.D.'s failure to inform the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's treatment, the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Timothy James Lepore, M.D., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count X.

1. The plaintiff, Ryan Close, is a minor who brings this action through his Mother and next friend, Christina Benson, a resident of Belchertown, MA, Hampshire County, Massachusetts.
2. The defendant, Mohammed Ahmed, M.D., was at all times relevant to this complaint a physician licensed to practice his profession in the Commonwealth of Massachusetts.
3. At all times relevant to this complaint, the defendant, Mohammed Ahmed, M.D., represented and held himself out to be a physician, skilled in the treatment of various illnesses and conditions and, in particular, represented to the minor plaintiff's parents that he was knowledgeable, competent, and qualified to diagnose and treat the minor plaintiff and his mother on or about 2/23/12.
4. On or about 2/23/12, the minor plaintiff's mother submitted herself and the minor plaintiff to the care and treatment of the defendant, Mohammed Ahmed, M.D., who negligently, carelessly, and without regard for the minor plaintiff's and his mother's health and well being, treated the minor plaintiff and his mother in a manner resulting in the minor plaintiff's severe personal injuries.

5. The injuries sustained by the minor plaintiff, Ryan Close, were the direct and proximate result of the carelessness, unskillfulness, negligence and improper care and treatment by the defendant, Mohammed Ahmed, M.D., including, but not limited to the following:
 - a. Defendant's misrepresentations to the minor plaintiff's parents that he was knowledgeable, skillful, and competent to diagnose and treat the minor plaintiff and his mother on or about 2/23/12;
 - b. Defendant's failure to adequately and properly diagnose the minor plaintiff's and his mother's medical condition on or about 2/23/12, and his failure to prescribe proper and timely treatment for said condition;
 - c. Defendant's failure to recognize, or have the knowledge to recognize his inability and lack of skill to diagnose and treat the minor plaintiff and his mother, when the defendant knew or should have known in the exercise of due care, the foreseeable consequences of his inability and failure to properly and skillfully provide the minor plaintiff and his mother with acceptable medical and diagnostic services;
 - d. Defendant's failure to possess or negligent failure to exercise that degree of skill, training, and care as is possessed and exercised by average qualified members of the medical profession practicing his specialty; and
 - e. Defendant's failure to inform and to warn of the risks involved in or associated with the minor plaintiff's and his mother's condition and failure to inform and to warn about the treatment of said condition.
6. As a direct and proximate result of the negligence, carelessness, and unskillfulness of the defendant, Mohammed Ahmed, M.D., the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Mohammed Ahmed, M.D., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

Count XI.


1. The minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, repeats and reavers fully herein Paragraphs One through Six of Count X of this complaint as if each were set forth here in its entirety.
2. On or about 2/23/12, the defendant, Mohammed Ahmed, M.D., contracted with the minor plaintiff's parents to provide professional services related to the minor plaintiff's and his mother's medical care and treatment.

6. The alternatives to and the risks and potential consequences of the defendant's choice of treatment were material to a decision by the minor plaintiff's parents and a reasonable person in their position as to whether to undergo the defendant's choice of treatment.
7. As a direct and proximate result of the defendant, Mohammed Ahmed, M.D.'s failure to inform the minor plaintiff's parents of the alternatives to and risks and potential consequences of the defendant's treatment, the minor plaintiff, Ryan Close, was caused to sustain severe and permanent personal injuries; has incurred and will continue to incur great expense for his 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 continue to be hospitalized; has been and will continue to be unable to pursue normal activities; and his ability to enjoy life has been permanently adversely affected.

WHEREFORE, the minor plaintiff, Ryan Close, through his Mother and next friend, Christina Benson, prays judgment against the defendant, Mohammed Ahmed, M.D., in an amount which is just and appropriate to compensate him for his injuries, together with interest and costs.

PLAINTIFF CLAIMS TRIAL BY JURY.

Respectfully submitted,
The plaintiff,
By his attorneys,



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