

# EXHIBIT 3

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

-----X Index No.: 1001507/15  
**MEGAN CONNOR,**

**Plaintiff,**

**VERIFIED BILL  
OF PARTICULARS**

**-against-**

**DAVID A. GLUCK, M.D., and PARK MED NYC, LLC.,**

**Defendants,**

-----X  
Plaintiff, MEGAN CONNOR, by her attorneys, KRENTSEL & GUZMAN, LLP, as and  
for her Verified Bill of Particulars as to Defendant, **DAVID A. GLUCK, M.D. and PARK  
MED NYC, LLC.,** sets forth the following upon information and belief:

1. A) February 1, 2016, at Parkmed NYC 800 2<sup>nd</sup> Avenue #065, New York, NY 10017  
B) See Answer 1(A)  
C) Any and all agents or employees of Parkmed NYC involved in the care and  
treatment of Megan Connor at Parkmed NYC on February 1<sup>st</sup>, 2016.  
D) See Answer 1(C)  
E) Plaintiff's injures occurred on February 1, 2016 and are permanent and life-long  
in nature.
2. Plaintiff objects to this demand as being improper in that it calls for evidentiary  
material or information in the form of, or to be gleaned from, expert testimony,  
and therefore, such demand is overly broad, improper and beyond the scope of a  
bill of particulars.

However, without waiving the foregoing objection, plaintiff can state, at this time, Defendant, DAVID A GLUCK, M.D., was negligent in the following respect: **in improperly performing an abortion; in negligently and improperly damaging and injuring Plaintiff's uterus; in negligently and improperly puncturing Plaintiff's uterus during an abortion; in improper surgical technique;** Failure to appreciate the signs, symptoms, and complaints of Plaintiff immediately following her procedure of severe abdominal pain and blood loss; Failure to refer Plaintiff for follow-up testing upon hearing Plaintiff's complaints of severe abdominal pain and blood loss; Failure to order radiographic examinations for Plaintiff to find out source of Plaintiff's severe abdominal pain and blood loss; Failure to use best medical judgment;

3. Plaintiff objects to this demand as being improper in that it calls for evidentiary material or information in the form of, or to be gleaned from, expert testimony, and therefore, such demand is overly broad, improper and beyond the scope of a bill of particulars.

However, without waiving the foregoing objection, plaintiff can state, at this time, Defendant, PARKMED NYC, was negligent in the following respect: **in improperly performing an abortion; in negligently and improperly damaging and injuring Plaintiff's uterus; in negligently and improperly puncturing Plaintiff's uterus during an abortion; in improper surgical technique;** Failure to appreciate the signs, symptoms, and complaints of Plaintiff immediately following her procedure of severe abdominal pain and blood loss; Failure to refer

Plaintiff for follow-up testing upon hearing Plaintiff's complaints of severe abdominal pain and blood loss; Failure to order radiographic examinations for Plaintiff to find out source of Plaintiff's severe abdominal pain and blood loss; Failure to use best medical judgment;

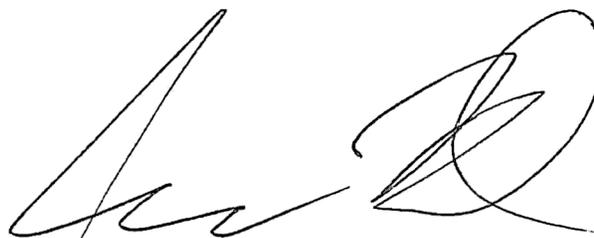
PARKMED, NYC, is vicariously liable for the improper care and treatment provided by DR. GLUCK as per Answer 2.

4. a) An abortion; b) Plaintiff was not made aware of any risks or potential complications related to the procedure; c) Plaintiff's uterus was perforated
5. Public Health Law 2801-d, Public Health Law 2805, Public Health Law 2805-d; Plaintiff reserves the right to supplement this pleading.
6. PARKMED NYC is vicariously liable for any and all agents or employees of Parkmed NYC involved in the care and treatment of Megan Connor at Parkmed NYC on February 1<sup>st</sup>, 2016.
7. Plaintiff undertook treatment to have an abortion performed.
8. Plaintiff's uterus was punctured; loss of ability to have children; post-traumatic stress disorder; loss of blood requiring blood transfusions; pain and suffering; anxiety
9. Plaintiff is not making a claim for special damages at this time other than enforceable lien amounts such as Medicaid and/or Medicare, to the extent they are applicable.
10. Plaintiff is not making a claim for special damages at this time other than enforceable lien amounts such as Medicaid and/or Medicare, to the extent they are

applicable.

11. See Answer 10
12. See Answer 10
13. See Answer 10.
14. ██████████ 1995; 5624 Ravens Crest Drive, Plainsboro, New Jersey 08536; ██████████ 4690
15. N/A
16. All hospitals, clinics, physician and/or medical practitioners for which plaintiff treated will be provided under separate cover along with authorizations.
17. N/A
18. N/A
19. CPLR Article 1602(7) - Defendant acted with reckless disregard for the safety of Plaintiff.

Dated: August 20, 2018  
New York, New York



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Jonathan J. Panarella, Esq.  
KRENTSEL & GUZMAN, LLP  
17 Battery Place, Suite 604  
New York, New York 10004

**ATTORNEY VERIFICATION**

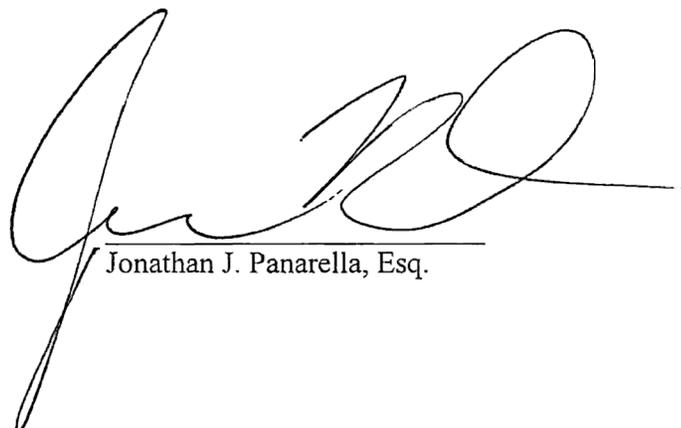
Jonathan J. Panarella, an attorney at law, duly admitted to practice in the Courts of the State of New York, affirms under the penalties of perjury that:

He is the attorney for the plaintiff(s) in the above entitled action. That he has read the foregoing **VERIFIED BILL OF PARTICULARS** and knows the contents thereof, and upon information and belief, deponent believes the matters alleged therein to be true.

The reason this Verification is made by deponent and not by the plaintiff(s) is that the plaintiff(s) herein reside(s) in a county other than the one in which the plaintiff's attorneys maintain their office.

The source of deponent's information and the grounds of his belief are communication, papers, reports and investigation contained in the file.

DATED: New York, New York  
August 20<sup>th</sup>, 2018



Jonathan J. Panarella, Esq.

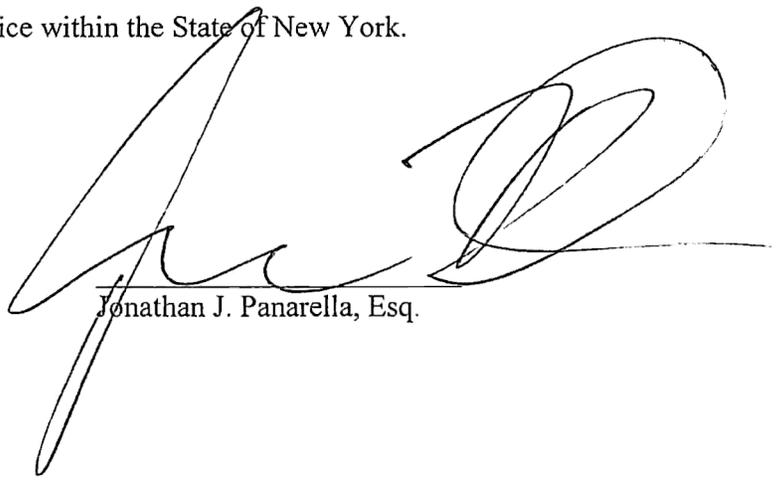
**AFFIRMATION OF SERVICE BY MAIL**

STATE OF NEW YORK                    )  
  )    ss.:  
COUNTY OF NEW YORK                )

Jonathan J. Panarella, an attorney duly admitted to practice law before the Courts of the State of New York, affirms the following under the penalties of perjury:

I am not a party to this action; I am over the age of 18 years; and reside in New York, New York.

On the 20<sup>th</sup> day of August, 2018, deponent served the within **VERIFIED BILL OF PARTICULARS** upon the following attorneys for the defendant(s), as listed below, at the address designated by said attorneys for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in a post office official depository under the exclusive care and custody of the United States Postal Service within the State of New York.



Jonathan J. Panarella, Esq.

TO:  
**DWYER & TAGLIA, ESQS.**  
*Attorneys for Defendants*  
111 John Street, Suite 620  
New York, New York 10038

Index No. : 805247/2018

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

MEGAN CONNOR,

Plaintiff(s),

-against-

DAVID A. GLUCK, M.D., and PARK MED NYC, LLC,

Defendant(s).

**VERIFIED BILL OF PARTICULARS**

**KRENTSEL & GUZMAN, LLP.**

*Attorneys for : Plaintiff(s)*

*Office and Post Office Address, Telephone*

17 Battery Place, #604

New York, New York 10004

(212) 227-2900

To  
Attorney(s) for

Service of a copy of the within  
is hereby admitted.  
Dated,

\_\_\_\_\_  
Attorney(s) for

PLEASE TAKE NOTICE:

NOTICE OF ENTRY

that the within is a (certified) true copy of a  
duly entered in the office of the clerk of the within name court on 19

NOTICE OF SETTLEMENT

that an order of which the within is a true copy  
will be presented for settlement to the HON. One of the judges of the  
within named Court, at

on at M.

Dated,

Yours, etc.

**KRENTSEL & GUZMAN, LLP.**