

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

-----X
SHEREA GILES,

Plaintiff,

-against-

**CHOICES WOMEN'S MEDICAL CENTER INC. and
GEORGE MCMILLAN M.D.**

Defendants.
-----X

To the above-named defendant(s):

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if a complaint is not served with this summons, to serve a notice of appearance, upon plaintiff's attorneys within twenty (20) days after service of this summons, exclusive of the day of service [or within thirty (30) days after service is complete if the summons is not personally delivered to you within the State of New York]; and in the case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Garden City, New York
February 28, 2019

Defendants:

CHOICES WOMEN'S MEDICAL CENTER INC.
147-32 Jamaica Avenue
Jamaica, New York 11435

GEORGE MCMILLAN M.D.
147-32 Jamaica Avenue
Jamaica, New York 11435

Index No.:

Plaintiff designates
Queens County as the place of
trial of this action

The basis of venue is:
Place of Business for Defendants

SUMMONS

JERALD S. CARTER, ESQ.

By:



JERALD S. CARTER

Attorney for Plaintiff

1103 Stewart Avenue, Suite 200
Garden City, New York 11530
(516) 640.3251

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

-----X
SHEREA GILES,

Plaintiff,

-against-

**CHOICES WOMEN'S MEDICAL CENTER INC. and
GEORGE MCMILLAN M.D.**

Defendants.
-----X

**VERIFIED
COMPLAINT**

Index No.:

The plaintiff, SHREA GILES by her attorney, Jerald S Carter Esq., complaining of the defendants, CHOICES WOMEN'S MEDICAL CENTER INC. and GEORGE McMillan respectfully shows and alleges, upon and belief as follows:

FIRST: The plaintiff, SHEREA GILES is a resident of the County of Suffolk and State of New York.

SECOND: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., was and still is a health care provider duly organized and existing under and by virtue of the laws of the State of New York.

THIRD: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., was and still is a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York.

FOURTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., was and still is a business entity doing or transacting business as Choices Women's Medical Center in the State of New York.

FIFTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., did maintain its principal place of business located at 147-32 Jamaica Avenue Jamaica. New York 11435.

SIXTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., owned a medical facility located at 147-32 Jamaica Avenue Jamaica, New York 11435.

SEVENTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., controlled a medical facility located at 147-32 Jamaica Avenue Jamaica, New York 11435.

EIGHTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., operated a medical facility located at 147-32 Jamaica Avenue, Jamaica, New York 11435.

NINTH: Defendant, CHOICES WOMEN'S MEDICAL CENTER INC., was and is a duly licensed medical facility which is operated in accord with the laws and regulations of the State of New York.

TENTH: Defendant, CHOICES WOMEN'S MEDICAL CENTER INC., its agents, servants and/or employees held itself out as qualified and competent to render requisite medical, surgical and treatment to the public at large and, more particularly to the plaintiff, SHREA GILES.

ELEVENTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., was engaged in supplying and furnishing medical and nursing personnel and services at Choices Women's Medical Center.

TWELFTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., employed physicians, nurses, physician assistants, nursing aides and other medical, administrative and non-medical personnel at Choices Women's Medical Center.

THIRTEENTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., by its agents, servants, and/or employees agreed to and undertook to faithfully, diligently, skillfully, and carefully and in accordance with accepted medical standards of practice and common usages prevailing in its locality, to furnish and supply proper, necessary and indicated care, treatment, attention and supervision and make available all necessary personnel and services hereinbefore alleged.

FOURTEENTH: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., by its agents, servants, and/or employees for agreed compensation agreed and undertook a duty to attend, care for, and treat plaintiff, SHREA GILES in a reasonable, proper, skillful and professional manner, in accordance with approved and accepted medical standards of practice.

FIFTEEN: At all times hereinafter mentioned, defendant, CHOICES WOMEN'S MEDICAL CENTER INC., its agents, servants, and/or employees, examined cared for and treated plaintiff, SHEREA GILES, as well as performed medical, surgical and other diagnostic procedures.

SIXTEENTH: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., was and still is a physician duly licensed to practice medicine in the State of New York.

SEVENTEENTH: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., was an employee of CHOICES WOMEN'S MEDICAL CENTER INC.

EIGHTEENTH: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., was an independent contractor of CHOICES WOMEN'S MEDICAL CENTER INC.

NINETEENTH: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., was an owner of CHOICES WOMEN'S MEDICAL CENTER INC.

TWENTIETH: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., was a member of CHOICES WOMEN'S MEDICAL CENTER INC.

TWENTY-ONE: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., was an agent and/or servant of defendant CHOICES WOMEN'S MEDICAL CENTER INC.

TWENTY-TWO: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., was associated with CHOICES WOMEN'S MEDICAL CENTER INC.

TWENTY-THREE: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., had privileges at Choices Women's Medical Center.

TWENTY-FOUR: At all times hereinafter mentioned, the defendant, GEORGE MC MILLAN M.D., was acting in the course and scope of his employment with CHOICES WOMEN'S MEDICAL CENTER INC.

TWENTY-FIVE: Defendant, GEORGE MCMILLIAN, held himself out to the public and to the plaintiff, SHREA GILES as possessing a proper degree of learning and skill incident to the practice of medicine and undertook to use reasonable to use reasonable care and diligence in the medical treatment of the plaintiff.

TWENTY-SIX: Defendant, GEORGE MCMILLIAN, held himself out to the public and to the plaintiff, SHREA GILES as a qualified physician who was competent to render requisite medical, surgical and treatment.

TWENTY-SEVEN: That at all times mentioned, the defendant, GEORGE MCMILLAN, specialized in the field of Obstetrics and Gynecology.

TWENTY-EIGHT: At all times hereinafter mentioned, defendant, GEORGE MC MILLAN M.D., by his agents, servants, and/or employees agreed to and undertook to faithfully, diligently, skillfully, and carefully and in accordance with accepted medical standards of practices and common usages prevailing in its locality, to furnish and supply proper, necessary and indicated care, treatment, attention and supervision and make available all necessary personnel and services hereinbefore alleged.

TWENTY-NINE: At all times hereinafter mentioned, defendant, GEORGE MC MILLAN, M.D. by his agents, servants, and/or employees for agreed compensation agreed and undertook to professionally, skillfully, diligently and carefully, in accordance with approved and accepted medical standards of practices, procedures and techniques prevailing in the locality, to treat care for and perform diagnostic, medical, nursing and other health related procedures upon the plaintiff SHEREA GILES.

THIRTIETH: At all times hereinafter mentioned, defendant, GEORGE MC MILLAN, by his agents, servants, and/or employees examined, cared for and treated plaintiff SHEREA GILES as well as performed medical, surgical and other diagnostic procedures.

AS AND FOR A FIRST CAUSE OF ACTION

THIRTY-ONE: Plaintiff repeats re-alleges and reiterates each and every allegation contained in Paragraphs FIRST through THIRTIETH with the same force and effect as if more fully set forth herein at length.

THIRTY-TWO: On or about August 31, 2018 plaintiff, SHEREA GILES presented herself and was a patient of the defendant, CHOICES WOMEN'S MEDICAL CENTER INC. for professional care and attention and was treated by said defendant, its agents, servants and/or employees.

THIRTY-THREE: On or about August 31, 2018 defendant, CHOICES WOMEN'S MEDICAL CENTER INC. undertook and agreed to render medical, surgical care and treatment to plaintiff, SHREA GILES.

THIRTY-FOUR: On or about August 31, 2018 plaintiff, SHEREA GILES was a patient at the defendant, CHOICES WOMEN'S MEDICAL CENTER INC. and was under the care, supervision and control of CHOICES WOMEN'S MEDICAL CENTER INC., its agents, servants and/or employees.

THIRTY-FIVE: On or about August 31, 2018 while the plaintiff, SHREA GILES was a patient in the care of defendant, CHOICES WOMEN'S MEDICAL CENTER INC., the defendant as well as its servants, agents and/or its employees ignored and/or disregarded the plaintiff's safety and health, and failed and neglected to take proper and reasonable precautions to avoid causing injury and damage to the plaintiff and failed to utilize the accepted standards in the community pertaining to the plaintiff's treatment and health.

THIRTY-SIX: The treatment rendered by defendant, CHOICES WOMEN'S MEDICAL CENTER INC, their agents, servants and/or employees was not in accord with good and accepted standards of medical and surgical care.

THIRTY-SEVEN: Defendant, CHOICES WOMEN'S MEDICAL CENTER INC, its agents, servants and/or employees were negligent, careless and reckless in supervising the medical, surgical care and treatment rendered to plaintiff, SHREA GILES.

THIRTY-EIGHT: That on or about August 31, 2018, the defendant, CHOICES WOMEN'S MEDICAL CENTER INC in attempting to treat plaintiff's conditions did so in a negligent, unskillful and careless manner in that the defendants failed to exercise the skill, care and diligence ordinarily possessed by and required of physicians; that the defendants, their agents, servants, employees were negligent and careless in the aforesaid medical, surgical and diagnostic

care and services rendered to the plaintiff; failed to properly and appropriately perform the surgical procedure performed on the plaintiff; failed to take proper precautions to ensure damage was not sustained to plaintiff's organs, blood vessels, nerves, ligaments and surrounding tissues; failed to perform proper pre-surgical testing to ensure damage was not sustained to the plaintiff, lacked the skill to properly perform the surgical procedure and used too much force causing damage to plaintiff's organs, blood vessels, nerves, ligaments and surrounding tissues; failed to provide acceptable care and treatment to the plaintiff including the failure to abide by accepted medical practice; failed to timely and properly perform physical examinations of the plaintiff; failed to timely and properly formulate a plan of treatment; used improper surgical technique; failed to obtain the plaintiff's informed consent; failed to provide sufficient information to plaintiff as to the risks, benefits and alternatives of the proposed treatment; so as to cause a failed treatment plan, personal injury, pain, suffering and other attendant damage to plaintiff.

FORTY: At all times hereinafter mentioned as a result of the aforesaid omissions, improper treatment and procedures all of which deviated from accepted standards of medical care in the community, said plaintiff, SHREA GILES suffered and sustained serious and severe injuries to her reproductive organs, resulting in severe loss of blood; cardiac arrest; catastrophic damage to her cervix and ovaries requiring and resulting in a total hysterectomy.

FORTY- ONE: At all times hereinafter mentioned, the defendant, CHOICES WOMEN'S MEDICAL CENTER INC., together with its agents, servants and/or employees, negligently and carelessly failed to exercise that degree of skilled care, competence, learning and diligence possessed and exercised by physicians, nurses, hospitals, clinics, sanatoriums, nursing homes, health related facilities and other medical and non-medical health services providers in the community.

FORTY- TWO: At all times hereinafter mentioned the aforesaid injuries were occasioned and caused solely by the carelessness, negligence, unskillfulness, and unprofessionalism of the defendant, CHOICES WOMEN'S MEDICAL CENTER INC., its agents, servants and/or employees.

FORTY-THREE: That by reason of the foregoing, plaintiff, SHEREA GILES, suffered cardiac arrest; severe loss of blood; severe internal hemorrhaging; catastrophic damage to her ovaries and cervix resulting a total hysterectomy, physical pain and suffering, mental anguish and other bodily related injuries culminating in a loss of enjoyment of life including but not limited to the ability to procreate as well as the onset of early menopause.

FORTY- FOUR: That all of the foregoing occurred without any negligence on the part of the plaintiff, SHEREA GILES contributing thereto.

FORTY-FIVE: As a result of the foregoing, the plaintiff, SHEREA GILES has been damaged in an amount to be determined at trial of this action.

FORTY-SIX: The amount of damages sought in this action exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

FORTY-SEVEN: C.P.L.R. Article 16 is in applicable to this action and/or this action falls within an exception as set forth in C.P.L.R section 1602.

AS AND FOR A SECOND CAUSE OF ACTION

FORTY-EIGHT: Plaintiff repeats re-alleges and reiterates each and every allegation contained in Paragraphs FIRST through FORTY-SEVEN with the same force and effect as if more fully set forth herein at length.

FORTY-NINE: Defendant, CHOICES WOMEN'S MEDICAL CENTER INC. prior to the granting and renewing of employment and association privileges of physicians, physician assistants, social workers, nurses, residents and others involved in the Plaintiff's care, failed to investigate the qualifications, competence, capacity abilities and capabilities of said staff including but not limited to, obtaining the following information; patient grievances, negative health care outcomes, incidents injurious to patients, medical malpractice actions commenced against said persons, including the outcome thereof, any history of associations, privileges and/or practice at other institutions, any discontinuance of said associations, employment, privileges and/or practice at other institutions, and any pending professional misconduct proceedings in the State or another State, the substance of the allegations in such proceedings and any additional information concerning such proceeding and the findings of the proceeding.

FIFTH: Had defendant, CHOICES WOMEN'S MEDICAL CENTER INC., made the above stated inquiry or, in the alternative, had defendants, reviewed and analyzed the information obtained in a proper manner, employment and or association would not have been granted.

FIFTY-ONE: By reason of the failure of the defendant, CHOICES WOMEN'S MEDICAL CENTER INC., to meet the aforementioned obligations, plaintiff was treated by physicians, physician assistants, social workers, nurses, residents and others who were lacking the requisite skills, abilities, competence and capacity, as a result of which the plaintiff, SHREA GILES, suffered and sustained serious and severe injuries to her reproductive organs, resulting a severe loss of blood; cardiac arrest; catastrophic damage to her cervix and ovaries requiring and resulting in a complete hysterectomy.

FIFTY-TWO: As a result of which the plaintiff, SHREA GILES, suffered and sustained serious and severe injuries to her reproductive organs, resulting a severe loss of blood; cardiac arrest; catastrophic damage to her cervix and ovaries requiring and resulting in a complete hysterectomy.

FIFTY-THREE: As a result of the foregoing, the plaintiff, SHEREA GILES has been damaged in an amount to be determined at trial of this action.

FIFTY-FOUR: The amount of damages sought in this action exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

FIFTY-FIVE: C.P.L.R. Article 16 is in applicable to this action and/or this action falls within an exception as set forth in C.P.L.R section 1602.

AS AND FOR A THIRD CAUSE OF ACTION

FIFTY-SIX: Plaintiff repeats re-alleges and reiterates each and every allegation contained in Paragraphs FIRST through FIFTY-FIVE with the same force and effect as if more fully set forth herein at length.

FIFTY-SEVEN: On or about August 31, 2018 plaintiff, SHEREA GILES presented herself and was a patient of the defendant, GEORGE MCMILLAN, M.D. for professional care and attention and was treated by said defendant, his agents, servants and/or employees.

FIFTY-EIGHT: On or about August 31, 2018 plaintiff, SHEREA GILES was a patient of the defendant, GEORGE MCMILLAN, M.D. and was under the care and supervision and control of GEORGE MCMILLAN, M.D. his agents, servants and/or employees.

FIFTY-NINE: That on or about August 31, 2018, the defendant, GEORGE MCMILLAN, M.D. in attempting to treat plaintiff's conditions did so in a negligent, unskillful and careless manner in that the defendants failed to exercise the skill, care and diligence ordinarily possessed by and required of physicians; that the defendants, their agents, servants, employees were negligent and careless in the aforesaid medical, surgical and diagnostic care and services rendered to the plaintiff; failed to properly and appropriately perform the surgical procedure performed on the plaintiff; failed to take proper precautions to ensure damage was not sustained to plaintiff's organs, blood vessels, nerves, ligaments and surrounding tissues; failed to perform proper pre-surgical

testing to ensure damage was not sustained to the plaintiff, lacked the skill to properly perform the surgical procedure and used too much force causing damage to plaintiff's organs, blood vessels, nerves, ligaments and surrounding tissues; failed to provide acceptable care and treatment to the plaintiff including the failure to abide by accepted medical practice; failed to timely and properly perform physical examinations of the plaintiff; failed to timely and properly formulate a plan of treatment; used improper surgical technique; failed to obtain the plaintiff's informed consent; failed to provide sufficient information to plaintiff as to the risks, benefits and alternatives of the proposed treatment; so as to cause a failed treatment plan, personal injury, pain, suffering and other attendant damage to plaintiff.

SIXTY: On or about August 31, 2018 while the plaintiff, SHERA GILES was patient in the care of GEORGE MCMILLAN M.D., the defendant as well as his servants, agents and/or its employees ignored and/or disregarded the plaintiff's safety and health, and failed and neglected to take proper and reasonable precautions to avoid causing injury and damage to the plaintiff and failed to utilize the accepted medical standards in the community pertaining to the plaintiff's treatment and health.

SIXTY-ONE: On or about August 31, 2018 while the plaintiff, SHERA GILES was a patient in the care of GEORGE MCMILLAN M.D., the defendant as well as its servants, agents and/or its employees ignored and/or disregarded the plaintiff's safety and health, and failed and neglected to take proper and reasonable precautions to avoid causing injury and damage to the plaintiff and failed to utilize the accepted standards in the community pertaining to the plaintiff's treatment including but not limited to the failure to properly dilate of the plaintiff's cervix prior to commencing invasive procedures.

SIXTY-TWO: At all times hereinafter mentioned as a result of the aforesaid omissions, improper treatment and procedures all of which deviated from accepted medical standards of care in the community, said plaintiff, SHERA GILES, suffered and sustained serious and severe injuries to her reproductive organs, resulting a severe loss of blood; cardiac arrest; catastrophic damage to her cervix and ovaries requiring and resulting in a complete hysterectomy.

SIXTY-THREE: At all times hereinafter mentioned, the defendant, GEORGE MCMILLAN M.D., together with his agents, servants and/or employees, negligently and carelessly failed to exercise that degree of skilled care, competence, learning and diligence possessed and exercised by physicians, nurses, hospitals, clinics, sanatoriums, nursing homes, health related facilities and other medical and non-medical health services providers in the community.

SIXTY- FOUR: At all times hereinafter mentioned the aforesaid injuries were occasioned and caused solely by the carelessness, negligence, unskillfulness, and unprofessionalism of the defendant GEORGE MCMILLAN M.D., his agents, servants and/or employees.

SIXTY-FOUR: That by reason of the foregoing, plaintiff, SHEREA GILES, suffered cardiac arrest; severe loss of blood; severe internal hemorrhaging; catastrophic damage to her ovaries and cervix resulting a total hysterectomy, physical pain and suffering, mental anguish and other bodily related injuries culminating in a loss of enjoyment of life including but not limited to the ability to procreate as well as the onset of early menopause.

SIXTY-FIVE: That all of the foregoing occurred without any negligence on the part of the plaintiff, SHEREA GILES contributing thereto.

SIXTY- SIX: As a result of the foregoing, the plaintiff, SHEREA GILES has been damaged in an amount to be determined at trial of this action.

SIXTY-SEVEN: The amount of damages sought in this action exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

SIXTY-EIGHT: C.P.L.R. Article 16 is in applicable to this action and/or this action falls within an exception as set forth in C.P.L.R section 1602.

AS AND FOR A FOURTH CAUSE OF ACTION

SIXTY-NINE: Plaintiff repeats re-alleges and reiterates each and every allegation contained in Paragraphs FIRST through SIXTY-EIGHT with the same force and effect as if more fully set forth herein at length.

SIXTY-NINE: There were certain risks, hazards and dangers with respect to the course of treatment, or lack thereof, undertaken by the defendants herein.

SEVENTY: The defendants, their agents, servants and employees failed to warn and advise plaintiff, SHREA GILES, of the risks, hazards and dangers of the aforesaid course of treatment or lack thereof.

SEVENTY-ONE: Plaintiff, SHREA GILES, had the right to know the risks, hazards dangers of the aforesaid course of treatment, or lack thereof, and available alternatives to it.

SEVENTY-TWO: Had plaintiff, SHREA GILES, or any reasonable person, been informed of the risks, hazards and dangers with respect to the above described course of treatment, or lack thereof, she would not have consented thereto.

SEVENTY-THREE: The lack of informed consent alleged herein is a proximate cause of the injuries, conditions and disabilities for which recovery is sought.

SEVENTY-FOUR: That this matter falls within the exceptions to joint and several liabilities as set forth in CPLR 1602 et. Seq. of the New York Civil Practice Law and Rules, as amended.


SEVENTY-FIVE: That by reason of the foregoing, the plaintiff, SHREA GILES suffered serious personal injuries, conscious pain and suffering and damaged in excess of the jurisdictional limit.

WHEREFORE, the plaintiff demands that this Court enter a judgment against the defendants, both jointly and separately, in an amount exceeding the jurisdictional limitations of all lower courts which would otherwise have jurisdiction over this case and awarding the plaintiff the costs and disbursements of this action and such other and further relief as this Court deem just and proper.

Dated: Garden City, New York

February 28, 2019

JERALD S. CARTER, ESQ.

By: 

JERALD S. CARTER
Attorneys for Plaintiff
1103 Stewart Avenue, Suite 200
Garden City, New York 11530
(516) 640-3251

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS-----X
SHELIA GILES,

Plaintiff,

VERIFICATION

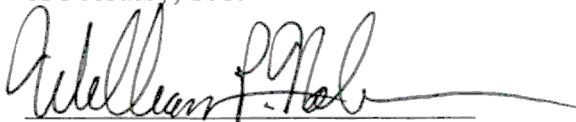
-against-

Index No.:

CHOICES WOMAN'S MEDICAL CENTER INC. and
GEORGE MCMILLAN M.D.Defendants.
-----XSTATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)

Sherea Giles being duly sworn deposes and states:

She is the plaintiff in this action.

That she has read the attached Verified Complaint and same is true as to her own belief,
except as to these matters alleged upon information and belief, and as to those matters, she
believes them to be true to the best of her knowledge.DATED: GARDEN CITY, NEW YORK
FEBRUARY 28, 2019
SHEREA GILESSworn to before me this 28th
of February, 2019
NOTARY PUBLICWILLIAM P. NOLAN
Notary Public, State of New York
No. 02N05070155
Qualified in Nassau County
Commission Expires Dec. 9, 2022

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

-----X
SHEREA GILES,

Plaintiff,

-against-

**CHOICES WOMEN'S MEDICAL CENTER INC. and
GEORGE MCMILLAN M.D.**

Defendants.
-----X

**CERTIFICATE
OF MERIT**

Index No.:

Jerald S. Carter, being duly sworn deposes and states the following to be true under the penalties of perjury:

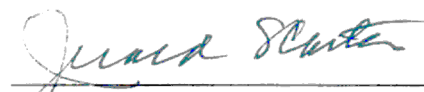
I am an attorney duly admitted to practice law in the State of New York. I am counsel for the Plaintiff in this matter.

I have reviewed the facts of the case and have consulted with at least one physician who is licensed to practice in this state or any other state and who I reasonably believe is knowledgeable in the relevant issues involved in this action, and I have concluded on the basis of this review and consultation that there is a reasonable basis for the commencement of this action.

Dated: Garden City, New York
February 28, 2019

JERALD S. CARTER, ESQ.

By:



JERALD S. CARTER
Attorneys for Plaintiff
1103 Stewart Avenue, Suite 200
Garden City, New York 11530
(516) 640.3251