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STATE OF MISSOURI)
)
CITY OF ST. LOUIS)

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS
STATE OF MISSOURI

MAUREEN PEAL	)	
	)	
Plaintiff,	)	
	)	Cause No.:
v.	)	
	)	Div No.:
PLANNED PARENTHOOD)		
4251 FOREST PARK AVE	)	MEDICAL MALPRACTICE
ST. LOUIS, MO 63108	)	
and	)	JURY TRIAL REQUESTED
DR. JUSTIN DEIDRICH	)	
(No Service Required)	)	
	)	
Defendants.	)	

HEALTH CARE AFFIDAVIT

Comes now Eugene H. Fahrenkrog, Jr., Attorney at Law and Attorney for Plaintiff in the above styled cause and Affiant herein and states to the Court pursuant to Missouri Revised Statutes Section 538.225 as follows:

1. That I have obtained a report from a legally qualified health care provider who is licensed in the State of Missouri and is board certified in Obstetrics & Gynecology and is actively practicing within the same area as Defendant Deidrich was practicing in 2018.

2. That the aforesaid written report states that Defendant Deidrich and Defendant Planned Parenthood deviated from appropriate standards of care as set out in the Petition herein and that said deviations directly and proximately caused and contributed to cause Plaintiff's injuries, damages and expenses as more fully set out in the aforesaid Petition.

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3. That the aforesaid written opinion assumes that the aforesaid attending physicians and fellows were acting as the duly authorized agents, servants, employees and representatives of Defendant Washington University and that the resident physicians were acting as the duly authorized agents, servants, employees and representatives of Defendant Barnes Jewish Hospital during their care for Plaintiff during the aforesaid hospitalization and that said physicians failed to use such care as reasonably prudent and careful health care providers would have provided under similar circumstances.

4. That the aforesaid deviations from standard of care directly caused or directly contributed to cause Plaintiff's injuries as set out in the Petition herein.

5. That the aforesaid written opinion relating to the aforesaid deviations from standard of care was provided by Dr. Michael J. DeRosa, M.D., 21 S. New Ballas, Tower A, Suite 101, St. Louis, MO 63141.

Eugene H. Fahrenkrog, Jr. #22309
Attorney for Plaintiff
7777 Bonhomme, Suite 2100
Clayton, MO 63105
(314) 241-4567
gfahrenkrog@mvp.net

Sworn and subscribed to before me this 21 day of March, 2019.

Notary Public

My Commission Expires:

SHERRY HERGET
Notary Public - Notary Seal
Jefferson County - State of Missouri
Commission Number 14455906
My Commission Expires Oct 13, 2022

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SHERRY HUBBER
Notary Public - Notary Seal
Jefferson County - State of Missouri
Commission Number 14455906
My Commission Expires Oct 13, 2022