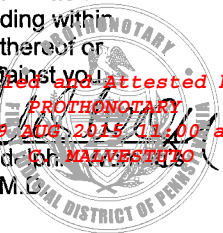


You are hereby notified to file a written response to the enclosed pleading within twenty (20) days from service thereof or a judgment may be entered against you.

Attested by
Donna L. Adelsberger
PROTHONOTARY
15 AUG 2015 11:00 am
Attorney for Defendants, Philadelphia Women's Center, Inc. and Taida Wolfe, M.D.



Donna L. Adelsberger, Esquire
DONNA ADELSBERGER & ASSOCIATES, P.C.
I.D. No. 53070
2782 Jenkintown Road
Glenside, PA 19038
215-576-8690
215-576-8695(fax)

Attorney for Defendants,
Philadelphia Women's Center, Inc. and
Taida Wolfe, M.D.

LAKEYSHIA MOODY	:	COURT OF COMMON PLEAS
	:	PHILADELPHIA COUNTY
vs.	:	JUNE TERM, 2015
	:	
	:	
PHILADLEPHIA WOMEN'S CENTER and TAIDA WOLFE, M.D.	:	No. 0239

**ANSWER OF DEFENDANTS, WOMEN'S CENTER, INC. AND TAIDA WOLFE, M.D. TO PLAINTIFF'S COMPLAINT TOGETHER WITH
NEW MATTER – AFFIRMATIVE DEFENSES**

1. Admitted in part; denied in part. It is admitted only that Lakeyshia Moody is an adult individual. Answering Defendants are without sufficient information to admit or deny the remaining allegations in this paragraph therefore, same are denied.

2. Admitted in part; denied in part. It is admitted that Philadelphia Women's Center, Inc. is a Pennsylvania corporation. The remaining allegations in this paragraph are denied. By way of further answer, Defendant's registered office is located at 777 Appletree Street, 7th Floor, Philadelphia, PA 19106.

3. Admitted.

4. Admitted.

5. Admitted.

6. Denied pursuant to Pa.R.C.P. 1029(e).

7. Denied pursuant to Pa.R.C.P. 1029(e).

8. The allegations in this paragraph state conclusions of law which require no responsive pleading, therefore, same are denied. It is specifically denied that Dr. Wolfe was an employee of Philadelphia Women's Center, Inc.

9. Admitted.

10. Admitted.

11. Admitted.

12. Denied as stated. It is admitted only that the Philadelphia Women's Center was, at all times material to this alleged incident, operated and controlled by Philadelphia Women's Center Inc. Philadelphia Women's Center, Inc. is owned by HUMEDCO Corp.

13. Denied. Answering Defendants are unable to answer the broad allegations in this paragraph, since no particular person is identified; therefore, same are denied. It is specifically denied that any medical personnel at the Philadelphia Women's Center, whether employees or independent contractors, failed to act within the course and scope of their employment.

14. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

15. Admitted.

16. Admitted.

17. Admitted only to the extent that the facts alleged in this paragraph are consistent with the medical records of the subject procedure.

18. Admitted only to the extent that the facts alleged in this paragraph are consistent with the medical records of the subject procedure.

19. Admitted only to the extent that the facts alleged in this paragraph are consistent with the medical records of the subject procedure.

20. Admitted only to the extent that the facts alleged in this paragraph are consistent with the medical records of the subject procedure.

21. Admitted only to the extent that the facts alleged in this paragraph are consistent with the medical records of the subject procedure.

22. Admitted.

23. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

24. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

25. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

26. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

27. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

28. Denied pursuant to Pa.R.C.P. 1029(e).

29. Denied pursuant to Pa.R.C.P. 1029(e).

30. Denied pursuant to Pa.R.C.P. 1029(e).

31. Denied pursuant to Pa.R.C.P. 1029(e).

32. Denied pursuant to Pa.R.C.P. 1029(e).

33. Denied pursuant to Pa.R.C.P. 1029(e).

34. Denied pursuant to Pa.R.C.P. 1029(e).

35. Denied pursuant to Pa.R.C.P. 1029(e).

COUNT I
MEDICAL NEGLIGENCE
PLAINTIFF LAKEYSHIA MOODY VS. DEFENDANT DR. TAIDA WOLFE

36. Answering Defendant incorporates her answers to paragraphs 1 through 35 as if fully set forth herein at length.

37. Denied. Dr. Wolfe was, at all times material to this incident, an independent contractor. It is further denied that Dr. Wolfe failed to act within the scope of her employment.

38.(a-p). Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in these paragraphs; therefore, same are denied and strict proof is demanded at trial.

39. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

40. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

41. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

WHEREFORE, Defendant, Taida Wolfe, M.D., demands judgment in her favor and against Plaintiff with prejudice together with costs and such other relief as deemed to be just and appropriate under the circumstances.

COUNT II
MEDICAL NEGLIGENCE
PLAINTIFF LAKEYSHIA MOODY VS. DEFENDANT PWC

42. Answering Defendant incorporates its answers to paragraphs 1 through 41 as if fully set forth herein at length.

43. Denied. Dr. Wolfe was an independent contractor.

44. Denied to the extent that the allegations in this paragraph imply that Dr. Wolfe was an employee of Philadelphia Women's Center.

45. This paragraph states conclusions of law which require no responsive pleading, therefore, same are denied.

46. Denied pursuant to Pa.R.C.P. 1029(e)

47 (a-p). Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

48. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

49. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

50. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

WHEREFORE, Defendant, Philadelphia Women's Center, Inc., demands judgment in its favor and against Plaintiff with prejudice together with costs and such other relief as deemed to be just and appropriate under the circumstances.

**COUNT III
CORPORATE NEGLIGENCE
PLAINTIFF LAKEYSHIA MOODY VS. DEFENDANT PWC**

51. Answering Defendant incorporates its answers to paragraphs 1 through 50 as if fully set forth herein at length.

52. This paragraph states conclusions of law which require no responsive pleading, therefore, same are denied.

53(a-i). Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in these paragraphs; therefore, same are denied and strict proof is demanded at trial.

54. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

55. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

56. Denied. After reasonable investigation, Answering Defendants are without sufficient knowledge or information to form a belief as to the truth of the averments

contained in this paragraph; therefore, same are denied and strict proof is demanded at trial.

WHEREFORE, Defendant demands judgment in its favor and against Plaintiff with prejudice together with costs and such other relief as deemed to be just and appropriate under the circumstances.

NEW MATTER – AFFIRMATIVE DEFENSES

57. Plaintiff has failed to state a cause of action upon which relief may be granted.

58. Plaintiff's alleged injuries were not proximately caused by any negligent act or omission on the part of Answering Defendants.

59. Plaintiff's alleged injuries and/or damages were or may have been proximately caused by medical conditions and/or other factors beyond the control of Answering Defendants.

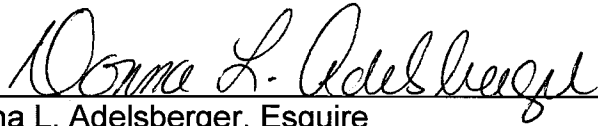
60. Answering Defendants assert all affirmative defenses and/or limitations on liability and damages pursuant to the Medical Care Availability and Reduction of Error (MCARE) Act 40 P.S. §1303-101 *et seq.*

61. Answering Defendants did not breach any duty to the Plaintiffs under the circumstances of this case.

62. Plaintiff was fully and completely informed and aware of the material risks and complications of the surgical procedure(s) she underwent at the time she consented to the procedure.

WHEREFORE, Answering Defendants demand judgment in their favor and against Plaintiff, with prejudice, together with costs and such other relief as deemed to be just and appropriate under the circumstances.

DONNA ADELSBERGER & ASSOCIATES, P.C.

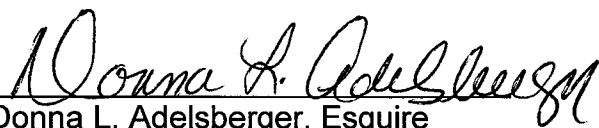


Donna L. Adelsberger, Esquire
Attorney for Defendants, Philadelphia Women's
Center, Inc. and Taida Wolfe, M.D.

DATE: 8/19/15

VERIFICATION

I, Donna L. Adelsberger, hereby state that I am the attorney for the Defendants in the within action and that the information contained in the attached Answer to Complaint is true and correct to the best of my information, knowledge and belief. This Verification is made subject to the penalties of 18 Pa.C.S.A. § 4904 relating to unsworn falsification to authorities. The undersigned has filed this verification because the designee for the Defendants is currently out of town and cannot be reached within the time allowed for this filing. The verification will be substituted by the designee upon her return.


Donna L. Adelsberger, Esquire
Attorney for Defendants, Philadelphia
Women's Center and Taida Wolfe, M.D.


Date: August 19, 2015

**CERTIFICATE OF SERVICE FOR DEFENDANTS'
ANSWER TO PLAINTIFF'S COMPLAINT**

I, Donna L. Adelsberger, Esquire, hereby certify that on the date set forth below, I sent a copy of Defendants' Answer to Complaint, via email to the following:

Kelly Trewella, Esquire
Emeka Igwe, Esquire
Law Offices of Emeka Igwe, P.A.
1500 Walnut Street
Suite 409
Philadelphia, PA 19102

DONNA ADELSBERGER & ASSOCIATES, P.C.

BY: 
Donna L. Adelsberger, Esquire
Attorney for Defendants

Date: 8/19/15