

SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
Civil Division

MARKEISHA HEMSLEY

[REDACTED]

[REDACTED]

Plaintiff,

v.

Civil Action No. 2021 CA 003339 M

KHALILAH Q. JEFFERSON

13103 Saint James Sanctuary Drive

Bowie, MD 20720-6370

-and-

UNITED HEALTH GROUP, LLC

d/b/a Capital Women's Services

6323 Georgia Avenue NW, Suite 210

Washington, D.C. 20011

SERVE:

R. Smith, Registered Agent

6323 Georgia Avenue NW, Suite 210

Washington, D.C. 20011

-and-

MOORE OBGYN, LLC

6196 Oxon Hill Road, Suite 610

Oxon Hill, MD 20745

SERVE:

Gina Thomas, Resident Agent

6196 Oxon Hill Road, Suite 610

Oxon Hill, MD 20745

Defendants.

COMPLAINT AND JURY DEMAND

COMES NOW, Markeisha Hemsley (“Ms. Hemsley, “or “Plaintiff”), by and through undersigned counsel, to file this Complaint and Jury Demand against Defendants Khalilah Q. Jefferson (“Jefferson” or “Defendant Jefferson”), United Health Group, LLC d/b/a Capital Women’s Services (“Capital Women’s Services”) and Moore OBGYN, LLC (“Moore OBGYN”) based on the following:

OVERVIEW

This is a medical malpractice case arising out of (1) Defendant Jefferson’s failure to adequately dilate Ms. Hemsley’s cervix for a second-trimester dilation and evacuation procedure, resulting in the perforation of Ms. Hemsley’s uterus and the expulsion of the fetal calvarium from the endometrial cavity into Ms. Hemsley’s abdomen; (2) Defendant Jefferson’s subsequent failure to manage the injuries she caused, as she personally transported Ms. Hemsley from Capital Women’s Services in Washington, D.C. to her other employer’s office, Moore OBGYN in Greenbelt, MD, rather than to a hospital; (3) Defendant Jefferson’s attempt of an illegal dilation and evacuation procedure in the offices of Moore OBGYN in Maryland; and (4) Defendant Jefferson’s failure to accurately record what occurred during the abortion procedure, making it impossible for any subsequent treating physicians to determine what was done to Ms. Hemsley. As a result of Defendant Jefferson’s outrageous actions, Ms. Hemsley suffered a perforated uterus, hemoperitoneum, hours of excruciating pain and suffering, and feared she was going to die. After emergency surgery at GW hospital to remove the calvarium from her abdomen and sew up her damaged uterus, Ms. Hemsley was counseled that her ability to have children in the future is in jeopardy. Defendant Jefferson’s actions, both negligent and reckless, were such a gross deviation from the standards of care that Ms. Hemsley is lucky to be alive.

And because at all relevant times Defendant Jefferson, as well as other persons who assisted her in providing care and treatment to Ms. Hemsley at Capital Women's Services and Moore OBGYN, were acting within the scope of their employment and/or agency with those entities, Capital Women's Services and Moore OBGYN are vicariously liable, jointly and severally, for their actions.

JURISDICTION AND VENUE

1. This Court has personal jurisdiction over all Defendants under D.C. Code §§ 13 422, and/or 13 423.
2. This Court has subject matter jurisdiction over this action under D.C. Code § 11-921(a)(6).
3. On or about February 1, 2021, Plaintiff served notice upon all Defendants in compliance with D.C. Code § 16-2802, placing Defendants on notice of her claims.

PARTIES

4. Plaintiff Markeisha Hemsley is an adult citizen of the State of Maryland, currently residing at 8960 Riverside Road, Nanjemoy, MD 20662.
5. Defendant Khalilah Jefferson is a citizen of the State of Maryland, currently residing at [REDACTED]. At all times relevant to this Complaint, Jefferson was a certified registered nurse practitioner licensed in the District of Columbia (License #RN961391) and Maryland (License #R147535), holding herself out as possessing the necessary expertise, skill, and ability to provide competent abortion services that met the requisite standard of care. At all times relevant to this Complaint, Jefferson was an employee/agent of both United Health Group, LLC d/b/a Capital Women's Services and Moore

OBGYN, LLC, whose negligent actions and inactions within the scope of said employment/agency caused Plaintiff's injuries.

6. Defendant United Health Group, LLC, d/b/a Capital Women's Services, is a District of Columbia limited liability company which was at all relevant times herein a health care provider with its principal place of business at 6323 Georgia Avenue, NW, Suite 210, Washington, DC 20011. At all times relevant hereto, Capital Women's Services provided health care services through its employees and real and/or ostensible agents, including but not limited to Khalilah Jefferson, attendants, front desk associates, and other physicians and/or nurses, to individuals in need thereof, including the Plaintiff, Markeisha Hemsley.

7. Defendant Moore OBGYN is a Maryland limited liability company which was at all relevant times herein a health care provider with a principal place of business at 6196 Oxon Hill Road, Suite 610, Oxon Hill, MD 20745, and who maintains five other offices, including a location at 1328 Southern Ave. SE, Suite 216, Washington, D.C. 20032. At all times relevant hereto, Moore OBGYN provided health care services through its employees and real and/or ostensible agents, including but not limited to: Khalilah Jefferson, attendants, front desk associates, and other physicians and/or nurses, to individuals in need thereof, including the Plaintiff, Markeisha Hemsley.

FACTS

8. Plaintiff incorporates by reference the preceding paragraphs of this Complaint as if fully set forth herein.

9. Plaintiff scheduled an appointment for a second-trimester abortion with Capital Women's Services sometime before October 25, 2018. Plaintiff chose Capital Women's Services

as they were the only abortion provider she contacted who represented that they performed second-trimester abortions.

10. When scheduling the appointment, Capital Women's Services did not ask for Ms. Hemsley's medical history, did not explain the second-trimester dilation and evacuation procedure, did not offer counseling, and did not schedule any appointments at Capital Women's Services (or any other medical provider) before October 25, 2018. They only asked for Ms. Hemsley's name and length of pregnancy.

11. Ms. Hemsley arrived at Capital Women's Services for her appointment on October 25, 2018, between 8:00 and 9:00 AM. Her mother, Dora Washington, accompanied her.

12. Upon arrival, an unidentified Capital Women's Services employee gave Ms. Hemsley several documents to review and endorse. These documents were titled "Informed Consent for Abortion After 14 Weeks," "Fact Sheet on 2nd Trimester Pregnancy Termination (Abortion)," "Consent for Abortion," "Consent for use of Misoprostol in Abortion," "Consent for Conscious Sedation," and "Consent for Laminaria Insertion." No employee informed Ms. Hemsley what these documents were, suggested that she review them carefully, or attempted to explain their contents.

13. The document titled "Informed Consent for Abortion after 14 Weeks" required the initialing of thirty-four (34) separate items across three pages, each replete with extensive medical terminology, and then the following final endorsement, which Ms. Hemsley signed:

Finally, after carefully reading all of the information on this four-page Informed Consent Agreement, and after initialing every paragraph on the Agreement, and after weighing my options, and after discussing my situation with a counselor, and after considering the nature of the abortion method as well as the risks, benefits and alternatives of a abortion, I declare my intention to have a abortion and I hereby consent to, and request that, my Doctor and UHG provide me with a abortion under the provisions of this Consent Agreement.

 10/25/18
Patient Signature and Date

 10/25/18
Witness Signature and Date

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Despite the language above, no counselor or any other employee of Capital Women's Services discussed anything with Ms. Hemsley at any time.

14. The document titled "Fact Sheet on 2nd Trimester Termination (Abortion)" described the Dilation and Evacuation surgical abortion procedure as follows:

HOW IS IT DONE?

Dilation and Evacuation is currently the most common method when the pregnancy has advanced more than 14 weeks from a woman's last menstrual period. The day prior to the abortion, tapered dilators are inserted into the patient's cervix, which swell and dilate the cervix overnight. It may be necessary to induce fetal demise with an injection into the uterus.

On the day of the procedure, a local anesthetic is usually injected into the cervix (the lower part of the uterus) in order to numb the cervix and make the patient more comfortable. In some cases, a relaxant or tranquilizing medication and other medications for pain may be given.

When the cervical opening is wide enough to admit it, the doctor will then insert into the uterus instruments to remove the pregnancy tissue. The doctor may also check to make sure all the tissue is removed with a small spoon shaped instrument called a curette.

Upon information and belief, when referring to tapered dilators, Defendants meant osmotic dilators.¹ Osmotic dilators are devices placed in the cervix 12-24 hours before an abortion procedure to absorb moisture and swell, opening the cervix slowly with minimal discomfort to the patient. Osmotic dilators are medically necessary to dilate the cervix to the proper diameter for a second-trimester abortion procedure. Contrary to this description, no osmotic dilators were inserted into Ms. Hemsley's cervix at any time.

15. In a section titled "Possible Complications," the document described Capital Women's Services' stated procedure if the patient's uterus was perforated:

Perforation: Rarely, an instrument may go through the wall of the uterus. The frequency of this event is about 1 per 1000 cases. Should this happen, hospitalization is usually required for observation and/or completion of the abortion. To inspect the condition of the uterus in this situation, a small telescope (laparoscope) can be inserted through the navel. Rarely, an abdominal operation is required to repair the damage. This can include hysterectomy (removal of the uterus), which makes it impossible to have children. The frequency of hysterectomy is less than 1 in 10,000 cases.

¹ "Tapered" describes a characteristic of the dilator and not a type of dilator.

16. As noted above, Ms. Hemsley was required to sign a document titled “Consent for Laminaria Insertion.” Laminaria is a small tube made of dried seaweed or kelp and is the most common type of osmotic dilator. No one administered laminaria to Ms. Hemsley at any time.

17. “Consent for Laminaria Insertion” also contained the following paragraph:

Markisha Hemsley hereby give my full informed consent to Dr. _____ and any other Physicians or Staff of United Health Group, LLC, and ask on my own free will that Dr. _____ insert Laminaria into my cervix. I understand that insertion of Laminaria into my cervix **IS A DEFINITIVE STEP TOWARDS CAUSING AND ABORTION AND COMMITS ME TO THE TERMINATION OF MY PREGNANCY.** I understand that although some patients have changed their mind and had their Laminaria removed and gone on to a normal full-term delivery. **NO STAFF OR PHYSICIAN OF United Health Group, LLC, HAS MADE ANY PROMISE OR GUARANTEE** that I would be able to continue to carry this pregnancy to term should I change my mind and either remove the Laminaria myself or ask someone else to remove the Laminaria. I have carefully evaluated all of my options and have decided of my own free will to terminate this pregnancy.

Like every other document Ms. Hemsley completed that referred to “your doctor” or “the doctor” as the source for procedural parameters and medication, the identity of this alleged physician is left blank.

18. No Capital Women’s Services personnel discussed the documents with Ms. Hemsley before, during, or after completion.

19. No Capital Women’s Services personnel discussed anything about the dilation and evacuation procedure with Ms. Hemsley at any time.

20. No Capital Women’s Services personnel discussed the risks of a second-trimester abortion procedure with Ms. Hemsley at any time.

21. No Capital Women’s Services personnel discussed the medications that would be used during the procedure with Ms. Hemsley at any time.

22. After turning in the paperwork, Ms. Hemsley paid approximately \$1,000.00 in cash for the procedure, with Ms. Washington paying the remaining \$495.00 by credit card for a total cost of roughly \$1,495.00.

23. After payment, another unidentified Capital Women's Services employee gave Ms. Hemsley two sets of pills and asked her to take them to soften her cervix. The employee instructed her to take the first set of pills immediately, wait an hour, and then take the second set.

24. According to the Abortion Procedure Record of Defendant Jefferson, these pills contained 200 mcg of Misoprostol. Misoprostol is primarily used for "medical abortions" - abortions that use medication to end pregnancy but has some utility in softening the cervix for surgical abortions like the one performed on Ms. Hemsley. However, to be effective, the proper dosing prescription would be 200 mcg every *three* hours, and then beginning the procedure six hours after the first dose.

25. Ms. Hemsley dutifully took the pills given to her, ingesting the first set upon receipt and the next set an hour later. Approximately two hours and forty-five minutes after taking the first set of pills, Ms. Hemsley was called back to the operating room to begin.

26. Defendant Jefferson entered the operating room wearing a white lab coat but did not identify herself. Ms. Hemsley believed at the time that Jefferson was a physician.

27. Jefferson instructed Ms. Hemsley to get undressed, lay down on the operating table, and place her legs in stirrups. Based upon the Abortion Procedure Record and later statements made by Jefferson to emergency medical personnel, she then administered 150 mg of ketamine and 4 mg of midazolam to Ms. Hemsley via injection at 2:15 PM. Ketamine and midazolam are sedatives used for inducing conscious sedation.

28. Shortly after Jefferson administered the ketamine and midazolam, Ms. Hemsley rolled over onto her side and vomited into a nearby trashcan. Nausea and vomiting are common side-effects of Misoprostol. Ms. Hemsley then began to feel drowsy and numb but remained aware of what was happening.

29. Jefferson next moved a sonogram wand over Ms. Hemsley's stomach and inserted a probe into Ms. Hemsley's cervix.

30. Following the attainment of a sonogram image of the fetus, upon information and belief, Jefferson inserted mechanical dilators into Ms. Hemsley's cervix. Mechanical dilators are firm, cylindrical devices usually made from either medical grade plastic or silicone. For a gestational period of 20.3 weeks, mechanical dilators are insufficient on their own to adequately dilate the cervix to the necessary 3-4 centimeters to evacuate the fetal tissue.

31. Without the laminaria or other form of osmotic dilator, Ms. Hemsley's cervix could not be dilated to the approximately 3-4 centimeters necessary for a second-trimester abortion procedure. That inadequate dilation was a direct and proximate cause of the perforation of her uterus.

32. Jefferson next inserted a cannula into Ms. Hemsley's uterus. A cannula is a thin tube connected to a specialized syringe or pump used to aspirate fetal tissue. Jefferson then began the evacuation.

33. The national standard of care for second-trimester abortions, and specifically for procedures at gestational periods of 20.3 weeks, required 1) the use of an osmotic dilator, typically laminaria, inserted 12-24 hours prior in order to dilate the cervix to 3-4 centimeters, depending on the size of the fetal tissue; 2) the use of two sizes of forceps, referred to as Bierer and Sopher forceps, to extract the fetal tissue and majority of the placenta through the cervix;

and 3) a suction curette to then extract the remainder of the fetal tissue and placenta inside of the uterus. Cannulas are rarely wide enough to adequately aspirate the large amount of fetal tissue present at this gestational age.

34. Jefferson notes on the Abortion Procedure Record that she used “Forceps” and “curette” but did not specify the type, and Ms. Hemsley does not recall seeing her use forceps at Capital Women’s Services.

35. At some point during the procedure, Ms. Hemsley’s sedation began to wear off. She felt intense, increasing pain in her lower abdomen, and noticed she was bleeding profusely.

36. Jefferson removed the cannula and moved the sonogram wand along Ms. Hemsley’s stomach. Ms. Hemsley heard Jefferson repeatedly say, “I missed it.” Based upon later treatment records, Jefferson was referring to the fetal calvarium, a portion of the fetal skull, which had exited the endometrial cavity and become lodged in Ms. Hemsley’s abdomen due to the uterine perforation.

37. At this point, Jefferson knew or should have known that Ms. Hemsley’s uterus was perforated and that the calvarium was in a location dangerous to Ms. Hemsley’s health. The national standard of care required that when a complication arises, the provider either correct the injury or assure that the patient is quickly taken to a facility that can manage the complication when a complication occurs. For an injury such as Ms. Hemsley’s, the standard of care required an abdominal exploration to determine the extent of the uterine defect and remove the remaining fetal parts. This can only be done at a hospital with full operating room facilities.

38. Instead, Jefferson emerged from the operating room and told Ms. Washington that the sonogram was not giving a clear enough image of the fetus and that she wanted to move Ms.

Hemsley to “her other office” where they had better equipment. Jefferson did not relay where they would be going, discuss Ms. Hemsley’s injuries, or suggest calling an ambulance.

39. Throughout the Capital Women’s Services procedure, Jefferson failed to properly record what was occurring on the Abortion Procedure Record, contrary to the national standard of care. For example, at the beginning of the procedure, Ms. Hemsley’s cervix was noted as dilated to 101 millimeters, or 10.1 centimeters. This diameter is both physically impossible with a mechanical dilator and medically unnecessary. Jefferson also reported an estimated blood loss of just 25 mL, an astonishingly low number for a procedure that typically produces a blood loss in the 100 mL – 400 mL range.

40. Farther down on the Abortion Procedure Record, Jefferson recorded the following narrative of what happened at Capital Women’s Services in the section entitled “Practitioner's Comments:”

Cervix dilated without difficulty and documented above. SROM², uterus evacuated utilizing classic D&E procedure. All fetal parts removed except part of cavaranium[sic]. Upon TV³ u/s cavaranium[sic] noted outside of uterus. EMS contacted & given update pt transferred to GW Hospital. Bp 118/60, p 80, T 98.9. Minimal bleeding.

41. Like the remainder of the abortion procedure record, this narrative contains numerous factual inaccuracies and puts into question what happened during Ms. Hemsley's procedure.

42. Jefferson did not contact EMS and did not facilitate the transportation of Ms. Hemsley to the hospital from Capital Women's Services. Instead, Jefferson instructed her

² Spontaneous rupture of membranes.

³ Trans-vaginal ultrasound.

attendants to help get Ms. Hemsley into the back seat of Jefferson's personal BMW SUV. Unable to sit up due to the pain, Ms. Hemsley laid down across the back seat with only a pad underneath to manage her bleeding.

43. Jefferson did not ask for Ms. Hemsley's consent to take her anywhere or inform her where they were going.

44. Jefferson transported Ms. Hemsley to the Moore OBGYN facility at 7525 Greenway Center Drive in Greenbelt, MD, approximately 14 miles away and across a state line. Ms. Hemsley remained in tremendous pain and pleaded for Jefferson to stop and take her to the hospital. In response, Jefferson turned the volume up on the stereo to drown out Ms. Hemsley's cries, insulted her, and yelled, "Shut up!"

45. Once they arrived at Moore OBGYN, Jefferson brought Ms. Hemsley inside with the assistance of another unidentified employee. Jefferson then placed Ms. Hemsley on an operating table, hooked her up to a sonogram belt, and attempted the same dilation and evacuation procedure as had failed at Capital Women's Services.

46. While registered nurses may perform surgical abortions in the District of Columbia, only licensed physicians may perform them under Maryland Law.⁴ Thus, in attempting a dilation and evacuation procedure in Maryland without the presence of a licensed physician, Defendant Jefferson, as well as the other employees of Moore OBGYN assisting her, were breaking the law.

47. At this point, Ms. Hemsley's medication had worn off, and she was in extreme pain. She cried out for Jefferson to stop and felt like she was going to die.

⁴ Md. Code Ann., Health-Gen. § 20-208 (LexisNexis 1991).

48. Jefferson did not stop and, upon information and belief, used forceps to try to remove the calvarium from the abdominal cavity through the cervix, a hazardous maneuver with Ms. Hemsley's uterus already perforated.

49. Ms. Washington, who had followed Jefferson to the Moore OBGYN facility and heard her daughter's cries, entered the operating room and saw Jefferson standing in front of her screaming daughter holding bloody forceps.

50. Jefferson finally acknowledged that Ms. Hemsley needed to go to the hospital. However, she pleaded with Ms. Washington not to identify their location when she called the ambulance. When Ms. Washington refused, Jefferson grabbed Ms. Washington's phone from her hand and impersonated Ms. Washington to the 9-1-1 dispatcher, repeatedly referring to Ms. Hemsley as "my daughter."

51. Jefferson then made Ms. Hemsley and Ms. Washington go downstairs in the elevator, and the three of them waited on the curb outside the Moore OBGYN building for the ambulance to arrive. Ms. Hemsley could not stand without Ms. Washington's support and was in and out of consciousness from the pain.

52. When the ambulance arrived, Jefferson intercepted the EMTs and identified herself as an employee of Moore OBGYN. She told the EMTs that Ms. Hemsley had "just had" an abortion at the Moore facility, and during the termination, the fetal calvarium became stuck inside the cervix, perforating the uterus and causing internal bleeding. As noted above, Jefferson knew or should have known the calvarium was stuck in Ms. Hemsley's abdominal cavity based on the ultrasound. This misrepresentation was intentional, self-serving, reckless, completely disregarded Ms. Hemsley's rights, and prolonged her pain and suffering.

53. After hours of excruciating pain and mistreatment, Ms. Hemsley finally arrived at the Emergency Room of George Washington Hospital (GW) via ambulance at approximately 6:15 PM. In the ER, Ms. Hemsley presented with altered consciousness and was in evident distress, describing throbbing pain in the lower right quadrant of her abdomen with a rating of 8/10.

54. At GW, the doctors diagnosed Ms. Hemsley with hemoperitoneum, a type of internal bleeding in which blood gathers in the peritoneal cavity, the space between the organs and the inner abdominal wall. Doctors also identified a seven-centimeter laceration on the left side of Ms. Hemsley's uterus, extending entirely across the left uterine artery.

55. Due to these injuries, Ms. Hemsley underwent a diagnostic laparoscopy, laparotomy with Pfannenstiel incision, a repair of uterine perforation, and a cystoscopy. Doctors had to temporarily remove Ms. Hemsley's uterus from her body to retrieve the partially crushed fetal calvarium from the peritoneal cavity.

56. The surgery at GW left Ms. Hemsley with a permanent scar extending from hip to hip, just above her groin area.

57. Following surgery, Dr. Kathryn Denny counseled Ms. Hemsley that she should not have children for at least two years due to the damage to her uterus and the subsequent surgery. If Ms. Hemsley did become pregnant in the future, Dr. Denny advised her it would require extensive monitoring, she would not be able to go into labor, and she would be unable to give birth vaginally ever again.

58. Due to concern over internal bleeding and the healing progress of her injuries, Ms. Hemsley remained hospitalized until October 29, 2018.

59. In addition to her physical injuries, the traumatic experience has left Ms. Hemsley with severe emotional and psychological damage. She was afraid to see an OBGYN, only returning in February of 2021, and continues to experience psychological and emotional symptoms, especially in October.

60. At all times relevant herein, Defendant Jefferson was acting within the scope of her employment and/or agency with Capital Women's Services and Moore OBGYN, thereby rendering them jointly and severally vicariously liable for her negligence under principles of *respondeat superior*.

61. As a direct and proximate result of Defendant Jefferson's conduct, Ms. Hemsley suffered severe, permanent injuries which required extensive medical treatment and from which she will never recover.

62. At all times relevant to this Complaint, Defendant Jefferson's conduct was outrageous and reckless toward the safety of Ms. Hemsley.

COUNT I
(Medical Negligence (Malpractice))
(Against all Defendants)

63. Plaintiff hereby incorporates each and every allegation set forth above as if fully incorporated herein.

64. At all times relevant hereto, Defendant Jefferson was a certified registered nurse practitioner licensed in the District of Columbia and the State of Maryland, and as such held herself out to the public and especially to Plaintiff as a professional well-skilled in the practice of medicine and especially well-skilled and competent in the practice of abortions.

65. At all times relevant hereto, Capital Women's Services engaged in the practice, *inter alia*, of healthcare, gynecological, and surgical services in the District of Columbia.

66. At all times relevant hereto, Moore OBGYN engaged in the practice, *inter alia*, of healthcare, gynecological, and surgical services in the District of Columbia and Maryland.

67. All Defendants, and persons for whose conduct they are legally responsible, owed Plaintiff the duty to exercise reasonable care and comply with the standard of care set forth in the laws of the District of Columbia, the State of Maryland, and nationally.

68. At all times herein, it was Defendants' duty to provide Plaintiff with that degree of care, skill, and diligence provided by a reasonably prudent abortion provider.

69. Notwithstanding the duties described above, Defendants negligently breached the standard of care and duties owed to Plaintiff, and directly and proximately caused Plaintiff's harm, injuries, and damages, as well as her related medical expenses (past, present, and future).

70. Without limitation or exclusion, the following specific negligent conduct or omission by Defendants caused or substantially contributed to Plaintiff's harm, injuries, and damages:

a. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently failed to administer laminaria, or any other osmotic dilator, to Ms. Hemsley's cervix before initiating the dilation and evacuation procedure, leading to her cervix being inadequately dilated for a second-trimester abortion;

b. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently failed to otherwise adequately dilate Ms. Hemsley's cervix for a second-trimester abortion before initiating the dilation and evacuation procedure. At a gestational age of 20.3 weeks, the cervix must be dilated between 3-4 centimeters to remove the fetal tissue;

c. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently administered Misoprostol to Ms. Hemsley. A dosage of 200 mcg prescribed to soften the cervix requires two total doses taken every three hours, not the one hour wait prescribed to Ms. Hemsley;

d. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently used mechanical dilators, in conjunction with Misoprostol, as the method of dilation for the second-trimester dilation and evacuation, in violation of the standard of care. Neither mechanical dilators nor Misoprostol at that dosage nor both together can achieve the necessary dilation of 3-4 centimeters required to perform the procedure safely;

e. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently failed to use Bierer and/or Sopher forceps to remove the fetal tissue and placenta from Ms. Hemsley's uterus prior to aspiration;

f. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently used a cannula to aspirate the fetal tissue without first removing the largest portions of the tissue and placenta with forceps;

g. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently failed to use a suction curette following the use of the forceps to remove the remainder of the fetal tissue and placenta from the uterus;

h. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently caused Ms. Hemsley's uterus to become perforated in the course of the dilation and evacuation;

i. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently caused the fetal calvarium to be expelled from the endometrial cavity and become lodged in Ms. Hemsley's abdominal cavity through the perforation of Ms. Hemsley's uterus, causing hemoperitoneum and other internal injuries;

j. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently failed to recognize and properly manage the complications arising from the injuries caused by the inadequate dilation of the cervix, and otherwise assure that Ms. Hemsley was quickly taken to a facility that could manage the complication;

k. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently failed to promptly transport Ms. Hemsley to a hospital, the only medical facility capable of performing an abdominal exploration to determine the extent of the uterine defect as well as to remove the fetal parts;

l. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently transported an injured Ms. Hemsley in Jefferson's personal vehicle to Moore OBGYN rather than a hospital or appropriate medical facility, without asking for Ms. Hemsley's consent or informing her where they were going;

m. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently attempted the same dilation and evacuation procedure at Moore OBGYN as had injured Ms. Hemsley at Capital Women's Services rather than treating her injuries or transporting her to a proper medical facility;

n. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently attempted to extract the fetal calvarium from the

abdominal cavity through Ms. Hemsley's cervix using forceps when she was already suffering from hemoperitoneum;

o. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently interfered with Ms. Hemsley's further medical care by, including but not limited to, maliciously delaying treatment and lying to the responding EMTs about what had occurred;

p. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently failed to document the procedure correctly, including but not limited to the inaccurate recording of the amount of cervical dilation, the estimated blood loss, and upon information and belief, the intentional misrepresentation of what occurred before, during, and after the procedure on the Abortion Procedure Record;

q. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, negligently failed to otherwise follow the standards and practices of a reasonably competent medical professional in performing a second-trimester dilation and evacuation abortion procedure.

71. As a direct and proximate result of the negligence of Defendants, and through no fault of her own, Plaintiff suffered, and will in the future suffer, pain and suffering, mental anguish, disfigurement, deformities, inconvenience, discomfort, emotional anguish, medical expenses, and other pecuniary losses.

72. The above injuries were caused solely and proximately by Defendants' negligence, without any contributory negligence on the part of Plaintiff.

73. In carrying out the aforesaid negligent acts and omissions, Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, acted in willful

disregard for the rights of Ms. Hemsley and their conduct was outrageous and/or reckless toward the safety of Ms. Hemsley, thereby entitling her to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against all Defendants, jointly and severally, as follows: (1) for compensatory damages in the amount of \$10,000,000.00, which amount will be proven at trial; (2) for all costs associated with this action; (3) for punitive damages in the amount of \$20,000,000.00; (4) for pre-and post-judgment interest as permitted by law; and (5) for such other and further relief as this Court may deem just and proper.

COUNT II
(Negligence *Per Se*)
(Against all Defendants)

74. Plaintiff hereby incorporates each and every allegation set forth above as if fully incorporated herein.

75. At all times relevant, Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, were employees and/or agents and acting within the scope of that employment and agency, rendering Defendants Capital Women's Services and Moore OBGYN jointly and severally vicariously liable under the doctrine of *respondeat superior*.

76. Defendant Jefferson is not and never has been a licensed physician certified to practice medicine in Maryland.

77. Defendants Jefferson's, as well as other employees of Capital Women's Services and Moore OBGYN, conduct in performing a surgical dilation and evacuation abortion procedure at Moore OBGYN in Greenbelt, MD, was in violation of Md. Code Ann., Health-Gen. § 20-208, which requires that "an abortion must be performed by a licensed physician."

78. Md. Code Ann., Health-Gen. § 20-208 (LexisNexis 1991) is designed to protect patients and ensure that abortion procedures are safe, effective, and performed consistent with the standards and practices of licensed physicians.

79. As a patient seeking abortion services, Ms. Hemsley is a member of the class of persons that Md. Code Ann., Health-Gen. § 20-208 (LexisNexis 1991) is designed to protect.

80. The injuries suffered by Ms. Hemsley are the type that Md. Code Ann., Health-Gen. § 20-208 (LexisNexis 1991) is intended to protect against.

81. Defendants Jefferson's, as well as other employees of Capital Women's Services and Moore OBGYN, violation of the laws of the State of Maryland, which caused Plaintiff's injuries, are evidence of negligence.

82. As a direct and proximate result of Defendants' negligence, and through no fault of her own, Plaintiff suffered, and will in the future suffer, pain and suffering, mental anguish, disfigurement, deformities, inconvenience, discomfort, emotional anguish, and medical expenses and other pecuniary losses.

83. In carrying out the aforesaid negligent acts and omissions, Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, acted in willful disregard for the rights of Ms. Hemsley, and their conduct was outrageous and/or reckless toward the safety of Ms. Hemsley, thereby entitling her to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against all Defendants, jointly and severally, as follows: (1) for compensatory damages in the amount of \$10,000,000.00, which amount will be proven at trial; (2) for all costs associated with this action; (3) for punitive damages in the amount of \$20,000,000.00; (4) for pre- and post-judgment interest as permitted by law; and (5) for such other and further relief as this Court may deem just and proper.

COUNT III
(Battery - Medical)
(Against all Defendants)

84. Plaintiff hereby incorporates each and every allegation set forth above as if fully incorporated herein.

85. Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, intentionally performed a dilation and evacuation procedure at Moore OBGYN without Ms. Hemsley's consent and despite her pleas to stop.

86. Ms. Hemsley did not consent to be transported to Moore OBGYN, nor to undergo a second attempt at a dilation and evacuation procedure at Moore OBGYN, nor to have Defendant Jefferson try to manually remove the fetal calvarium from her abdominal cavity through her cervix using forceps.

87. In transporting Ms. Hemsley to Moore OBGYN in Maryland for an unwanted medical procedure, performing an unconsented to dilation and evacuation procedure at Moore OBGYN, and using forceps to try to remove the fetal calvarium from Ms. Hemsley's abdominal cavity through her cervix, Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, committed an unwanted, harmful, and offensive touching, outside and distinct from the scope of any consented to medical procedure, and unrelated to the exigent circumstances, namely the perforated uterus, that otherwise existed.

88. Defendant Jefferson's, as well as other employees of Capital Women's Services and Moore OBGYN, performance of an abortion at Moore OBGYN without a licensed physician, in violation of Md. Code Ann., Health-Gen. § 20-208 (LexisNexis 1991), is evidence of battery. Indeed, as a matter of law, Plaintiff could not have consented to the illegal procedure.

89. As a direct and proximate result of this unwanted, intentional touching, Plaintiff suffered pain and suffering, mental anguish, disfigurement, deformities, inconvenience, discomfort, emotional anguish, medical expenses, and other pecuniary losses.

90. At all times relevant, Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, were employees and/or agents, and acting within the scope of that employment and agency, rendering Defendants Capital Women's Services and Moore OBGYN jointly and severally vicariously liable under the doctrine of *respondeat superior*.

91. In transporting Ms. Hemsley to Moore OBGYN for the purpose of an unwanted medical procedure, performing an unconsented to dilation and evacuation procedure at Moore OBGYN, and using forceps to try and remove the fetal calvarium from Ms. Hemsley's abdominal cavity through her cervix, Defendant Jefferson, as well as other employees of Capital Women's Services and Moore OBGYN, acted in willful disregard for the rights of Ms. Hemsley and their conduct was outrageous and/or reckless toward the safety of Ms. Hemsley, thereby entitling her to an award of punitive damages.

WHEREFORE, Plaintiff demands judgment against all Defendants, jointly and severally, as follows: (1) for compensatory damages in the amount of \$10,000,000.00, which amount will be proven at trial; (2) for all costs associated with this action; (3) for punitive damages in the amount of \$20,000,000.00; (4) for pre- and post-judgment interest as permitted by law; and (5) for such other and further relief as this Court may deem just and proper.

COUNT IV
(Lack of Informed Consent)
(Against all Defendants)

92. Plaintiff hereby incorporates each and every allegation set forth above as if fully incorporated herein.

93. Defendants, individually and collectively, had a duty to explain the possible risks, complications, and dangers of the second-trimester dilation and evacuation procedure, and the potential outcomes of the treatment to Plaintiff, beyond giving her a stack of papers replete with medical terminology to sign. Defendants negligently failed to do so.

94. The disclosures that were made to Plaintiff were false and misleading, and Defendants made no effort to ensure Plaintiff had an informed understanding of what she agreed to.

95. Additionally, contrary to the representations made on both their advertising material and on the documentation given to Ms. Hemsley before the procedure, Defendants did not inform Plaintiff of, among other things:

- a. That Ms. Hemsley would be treated exclusively by Defendant Jefferson, a certified nurse practitioner, and other non-physician employees of Capital Women's Services and Moore OBGYN, and not by a board-certified physician;

- b. That Defendants would not be administering laminaria or any other osmotic dilator before the procedure, in contravention of the standard of care;

- c. That Defendants would not be dilating her cervix to an adequate amount for second-trimester abortion;

- d. That Defendants would not transport Ms. Hemsley to a hospital immediately when complications arose;

- e. That Defendant Jefferson would attempt to do a second dilation and evacuation procedure on Ms. Hemsley at Moore OBGYN when Ms. Hemsley was already grievously injured;

f. That Defendant Jefferson would fail to accurately record what occurred on the Abortion Procedure Record.

96. Had Ms. Hemsley been appropriately informed of these facts at any time, she would not have consented in any manner to the treatment she received from Defendants.

97. Due to Defendants' concealment, omissions, misrepresentations, and failures to inform Ms. Hemsley of the above information, both individually and collectively, Plaintiff could not make an informed decision about accepting Defendants' treatment.

98. Defendants' failure, individually and collectively, to provide informed consent was a proximate cause of injuries and damages to Plaintiff.

99. As a direct and proximate result of the failure to provide informed consent by Defendants, and through no fault of her own, Plaintiff suffered, and will continue to suffer, pain and suffering, mental anguish, disfigurement, deformities, inconvenience, discomfort, emotional anguish, medical expenses, and other pecuniary losses.

100. In failing to counsel or discuss the procedure with Ms. Hemsley and then actively concealing and misrepresenting what they would do, Defendants acted in willful disregard for the rights of Ms. Hemsley and their conduct was outrageous and/or reckless toward the safety of Ms. Hemsley, thereby entitling her to an award of punitive damages

WHEREFORE, Plaintiff demands judgment against all Defendants, jointly and severally, as follows: (1) for compensatory damages in the amount of \$10,000,000.00, which amount will be proven at trial; (2) for all costs associated with this action; (3) for punitive damages in the amount of \$20,000,000.00 (4) for pre-and post-judgment interest as permitted by law; and (5) for such other and further relief as this Court may deem just and proper.

COUNT V
(Negligent Hiring, Training, Supervision, and Retention)
(Against Defendants Capital Women's Services and Moore OBGYN)

101. Plaintiff hereby incorporates each and every allegation set forth above as if fully incorporated herein.

102. Capital Women's Services and Moore OBGYN owed Ms. Hemsley a duty to use reasonable care to select, train, supervise, and retain employees who are competent and fit to perform the duties required of their perspective positions.

103. As part of that duty, Capital Women's Services had the duty to ensure that Defendant Jefferson and its other employees were properly trained, instructed, and supervised in their performance of surgical abortion procedures consistent with the applicable standard of care and the laws and regulations of the District of Columbia and nationally.

104. As part of that duty, Moore OBGYN had the duty to ensure that Defendant Jefferson and its other employees were properly trained, instructed, and supervised in their performance of surgical abortion procedures consistent with the applicable standard of care and the laws and regulations of the State of Maryland.

105. Capital Women's Services breached its duty to Ms. Hemsley by failing to train, instruct, and/or supervise Defendant Jefferson, and other employees and/or agents, in the safe and proper administration of a second-trimester dilation and evacuation abortion, including, among other things, the administration of an osmotic dilator, the proper cervical dilation for evacuation, the proper use of Misoprostol, the use of forceps, the use of a suction curette, the management of procedural complications, and the proper recording of what occurred during the procedure.

106. As a direct and proximate result of the negligence of Defendant Capital Women's Services, Ms. Hemsley suffered pain and suffering, mental anguish, disfigurement, deformities,

inconvenience, discomfort, emotional anguish, and economic damages including medical expenses.

107. Moore OBGYN breached their duty to Ms. Hemsley by failing to train, instruct, and/or supervise Defendant Jefferson in Maryland Law, Md. Code Ann., Health-Gen. §20-208 (LexisNexis 1991), which requires that only a physician licensed to practice medicine in the state may provide surgical abortion services.

108. Moore OBGYN further breached their duty to Ms. Hemsley by failing to train, instruct, and/or supervise Jefferson, as well as other employees of Moore OBGYN, so that they knew that Ms. Hemsley's cervix was not adequately dilated for a dilation and evacuation at 20.3 weeks, that the use of forceps to remove the calvarium from the abdominal cavity was dangerous, and that Ms. Hemsley's perforated uterus required immediate hospital treatment, consistent with the standard of care of the State of Maryland and nationally.

109. As a direct and proximate result of the negligence of Moore OBGYN, Ms. Hemsley suffered, and will in the future suffer, pain and suffering, mental anguish, disfigurement, deformities, inconvenience, discomfort, emotional anguish, and economic damages including medical expenses.

WHEREFORE, Plaintiff demands judgment against Defendants Capital Women's Services and Moore OBGYN, jointly and severally, as follows: (1) for compensatory damages in the amount of \$10,000,000.00, which amount will be proven at trial; (2) for all costs associated with this action; (3) for pre-and post-judgment interest as permitted by law; and (4) for such other and further relief as this Court may deem just and proper.

JURY TRIAL REQUESTED

Plaintiff respectfully requests a jury trial in this action to the maximum extent permitted by law.

Respectfully submitted,
Markeisha Hemsley

September 21, 2021

A handwritten signature in black ink, appearing to read "Peter C. Grenier".

Peter C. Grenier (DCB #418570)
David W. Blum (DCB #1029697)
GRENIER LAW GROUP PLLC
1920 L Street NW, Suite 750
Washington, DC 20036
Telephone: (202) 768-9600
Facsimile: (202) 768-9604
pgrenier@grenierlawgroup.com
dblum@grenierlawgroup.com
Counsel for Plaintiff

Superior Court of the District of Columbia

CIVIL DIVISION- CIVIL ACTIONS BRANCH

INFORMATION SHEET

Markeisha Hemsley

Case Number: **2021 CA 003339 M**

VS

Date: **September 21, 2021**

Khalilah Q. Jefferson, United Health Group, LLC d/b/a Capital Women's Services, and Moore OBGYN, LLC

☐ One of the defendants is being sued in their official capacity.

Name: <i>(Please Print)</i> Peter C. Grenier		Relationship to Lawsuit <input checked="" type="checkbox"/> Attorney for Plaintiff <input type="checkbox"/> Self (Pro Se) <input type="checkbox"/> Other: _____
Firm Name: Grenier Law Group, PLLC		
Telephone No.: 202-768-9600	Six digit Unified Bar No.: 418570	

TYPE OF CASE: ☐ Non-Jury ☒ 6 Person Jury ☐ 12 Person Jury
Demand: \$ **30,000,000.00** Other: _____

PENDING CASE(S) RELATED TO THE ACTION BEING FILED

Case No.: _____ Judge: _____ Calendar #: _____

Case No.: _____ Judge: _____ Calendar #: _____

NATURE OF SUIT: *(Check One Box Only)*

A. CONTRACTS

COLLECTION CASES

- | | | |
|---|---|---|
| <input type="checkbox"/> 01 Breach of Contract | <input type="checkbox"/> 14 Under \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 16 Under \$25,000 Consent Denied |
| <input type="checkbox"/> 02 Breach of Warranty | <input type="checkbox"/> 17 OVER \$25,000 Pltf. Grants Consent | <input type="checkbox"/> 18 OVER \$25,000 Consent Denied |
| <input type="checkbox"/> 06 Negotiable Instrument | <input type="checkbox"/> 27 Insurance/Subrogation | <input type="checkbox"/> 26 Insurance/Subrogation |
| <input type="checkbox"/> 07 Personal Property | Over \$25,000 Pltf. Grants Consent | Over \$25,000 Consent Denied |
| <input type="checkbox"/> 13 Employment Discrimination | <input type="checkbox"/> 07 Insurance/Subrogation | <input type="checkbox"/> 34 Insurance/Subrogation |
| <input type="checkbox"/> 15 Special Education Fees | Under \$25,000 Pltf. Grants Consent | Under \$25,000 Consent Denied |
| | <input type="checkbox"/> 28 Motion to Confirm Arbitration | |
| | Award (Collection Cases Only) | |

B. PROPERTY TORTS

- | | | |
|--|---|--------------------------------------|
| <input type="checkbox"/> 01 Automobile | <input type="checkbox"/> 03 Destruction of Private Property | <input type="checkbox"/> 05 Trespass |
| <input type="checkbox"/> 02 Conversion | <input type="checkbox"/> 04 Property Damage | |
| <input type="checkbox"/> 07 Shoplifting, D.C. Code § 27-102(a) | | |

C. PERSONAL TORTS

- | | | |
|--|---|---|
| <input type="checkbox"/> 01 Abuse of Process | <input type="checkbox"/> 10 Invasion of Privacy | <input type="checkbox"/> 17 Personal Injury (Not Automobile, Not Malpractice) |
| <input type="checkbox"/> 02 Alienation of Affection | <input type="checkbox"/> 11 Libel and Slander | <input type="checkbox"/> 18 Wrongful Death (Not Malpractice) |
| <input type="checkbox"/> 03 Assault and Battery | <input type="checkbox"/> 12 Malicious Interference | <input type="checkbox"/> 19 Wrongful Eviction |
| <input type="checkbox"/> 04 Automobile Personal Injury | <input type="checkbox"/> 13 Malicious Prosecution | <input type="checkbox"/> 20 Friendly Suit |
| <input type="checkbox"/> 05 Deceit (Misrepresentation) | <input type="checkbox"/> 14 Malpractice Legal | <input type="checkbox"/> 21 Asbestos |
| <input type="checkbox"/> 06 False Accusation | <input checked="" type="checkbox"/> 15 Malpractice Medical (Including Wrongful Death) | <input type="checkbox"/> 22 Toxic/Mass Torts |
| <input type="checkbox"/> 07 False Arrest | <input type="checkbox"/> 16 Negligence (Not Automobile, Not Malpractice) | <input type="checkbox"/> 23 Tobacco |
| <input type="checkbox"/> 08 Fraud | | <input type="checkbox"/> 24 Lead Paint |

SEE REVERSE SIDE AND CHECK HERE IF USED

Information Sheet, Continued

C. OTHERS

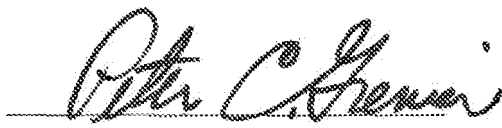
- | | |
|---|---|
| <input type="checkbox"/> 01 Accounting | <input type="checkbox"/> 17 Merit Personnel Act (OEA) |
| <input type="checkbox"/> 02 Att. Before Judgment | (D.C. Code Title I, Chapter 6) |
| <input type="checkbox"/> 05 Ejectment | <input type="checkbox"/> 18 Product Liability |
| <input type="checkbox"/> 09 Special Writ/Warrants
(DC Code § 11-941) | <input type="checkbox"/> 24 Application to Confirm, Modify,
Vacate Arbitration Award (DC Code § 16-4401) |
| <input type="checkbox"/> 10 Traffic Adjudication | <input type="checkbox"/> 29 Merit Personnel Act (OHR) |
| <input type="checkbox"/> 11 Writ of Replevin | <input type="checkbox"/> 31 Housing Code Regulations |
| <input type="checkbox"/> 12 Enforce Mechanics Lien | <input type="checkbox"/> 32 Qui Tam |
| <input type="checkbox"/> 16 Declaratory Judgment | <input type="checkbox"/> 33 Whistleblower |

II.

- | | | |
|--|---|--|
| <input type="checkbox"/> 03 Change of Name | <input type="checkbox"/> 15 Libel of Information | <input type="checkbox"/> 21 Petition for Subpoena
[Rule 28-1 (b)] |
| <input type="checkbox"/> 06 Foreign Judgment/Domestic | <input type="checkbox"/> 19 Enter Administrative Order as
Judgment [D.C. Code § | <input type="checkbox"/> 22 Release Mechanics Lien |
| <input type="checkbox"/> 08 Foreign Judgment/International | 2-1802.03 (h) or 32-151 9 (a)] | <input type="checkbox"/> 23 Rule 27(a)(1)
(Perpetuate Testimony) |
| <input type="checkbox"/> 13 Correction of Birth Certificate | <input type="checkbox"/> 20 Master Meter (D.C. Code § | <input type="checkbox"/> 24 Petition for Structured Settlement |
| <input type="checkbox"/> 14 Correction of Marriage
Certificate | 42-3301, et seq.) | <input type="checkbox"/> 25 Petition for Liquidation |
| <input type="checkbox"/> 26 Petition for Civil Asset Forfeiture (Vehicle) | | |
| <input type="checkbox"/> 27 Petition for Civil Asset Forfeiture (Currency) | | |
| <input type="checkbox"/> 28 Petition for Civil Asset Forfeiture (Other) | | |

D. REAL PROPERTY

- | | |
|--|--|
| <input type="checkbox"/> 09 Real Property-Real Estate | <input type="checkbox"/> 08 Quiet Title |
| <input type="checkbox"/> 12 Specific Performance | <input type="checkbox"/> 25 Liens: Tax / Water Consent Granted |
| <input type="checkbox"/> 04 Condemnation (Eminent Domain) | <input type="checkbox"/> 30 Liens: Tax / Water Consent Denied |
| <input type="checkbox"/> 10 Mortgage Foreclosure/Judicial Sale | <input type="checkbox"/> 31 Tax Lien Bid Off Certificate Consent Granted |
| <input type="checkbox"/> 11 Petition for Civil Asset Forfeiture (RP) | |



..... Attorney's Signature

September 21, 2021

.....
Date



Superior Court of the District of Columbia

CIVIL DIVISION

Civil Actions Branch

500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001

Telephone: (202) 879-1133 Website: www.dccourts.gov

MARKEISHA HEMSLEY

Plaintiff

vs.

KHALILAH Q. JEFFERSON

Defendant

Case Number **2021 CA 003339 M**

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Peter C. Grenier

Name of Plaintiff's Attorney

1920 L Street NW, Suite 750

Address

202-768-9600

Telephone

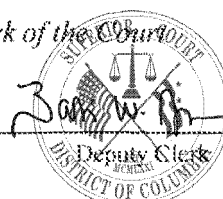
如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

법원을 함하사람, (202) 879-4828로 전화주세요. የአገርን ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

Clerk of the Court



By

Date

09/22/2021

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA

DIVISIÓN CIVIL

Sección de Acciones Civiles

500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001

Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

Demandante

contra

Número de Caso: _____

Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintiún (21) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante

Por:

Dirección

Subsecretario

Fecha

Teléfono

如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

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IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE OPONERSE A ESTA ACCIÓN, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
See reverse side for English original



Superior Court of the District of Columbia

CIVIL DIVISION

Civil Actions Branch

500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001

Telephone: (202) 879-1133 Website: www.dccourts.gov

MARKEISHA HEMSLEY

Plaintiff

vs.

Case Number **2021 CA 003339 M**

UNITED HEALTH GROUP, LLC D/B/A CAPITAL WOMEN'S SERVICES

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

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Peter C. Grenier

Name of Plaintiff's Attorney

1920 L Street NW, Suite 750

Address

(202) 768-9600

Telephone

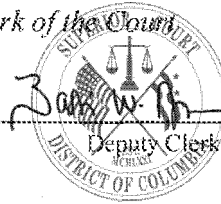
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Để có một bản dịch, hãy gọi (202) 879 4828

법률용 원어사, (202) 879-4828로 전화하십시오. የአግርኛ ትርጉም ለማግኘት (202) 879-4828 ይደውሉ

Clerk of the Court



By

Date

09/22/2021

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

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Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL

Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
contra _____

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

Por la presente se le cita a comparecer y se le requiere entregar una Contestación a la Demanda adjunta, sea en persona o por medio de un abogado, en el plazo de veintidós (22) días contados después que usted haya recibido este citatorio, excluyendo el día mismo de la entrega del citatorio. Si usted está siendo demandado en calidad de oficial o agente del Gobierno de los Estados Unidos de Norteamérica o del Gobierno del Distrito de Columbia, tiene usted sesenta (60) días, contados después que usted haya recibido este citatorio, para entregar su Contestación. Tiene que enviarle por correo una copia de su Contestación al abogado de la parte demandante. El nombre y dirección del abogado aparecen al final de este documento. Si el demandado no tiene abogado, tiene que enviarle al demandante una copia de la Contestación por correo a la dirección que aparece en este Citatorio.

A usted también se le requiere presentar la Contestación original al Tribunal en la Oficina 5000, sito en 500 Indiana Avenue, N.W., entre las 8:30 a.m. y 5:00 p.m., de lunes a viernes o entre las 9:00 a.m. y las 12:00 del mediodía los sábados. Usted puede presentar la Contestación original ante el Juez ya sea antes que usted le entregue al demandante una copia de la Contestación o en el plazo de siete (7) días de haberle hecho la entrega al demandante. Si usted incumple con presentar una Contestación, podría dictarse un fallo en rebeldía contra usted para que se haga efectivo el desagravio que se busca en la demanda.

SECRETARIO DEL TRIBUNAL

Nombre del abogado del Demandante _____

Por: _____ Subsecretario

Dirección _____

Fecha _____

Teléfono _____

如需翻译, 请打电话 (202) 879-4828. Veuillez appeler au (202) 879-4828 pour une traduction. Để có một bản dịch, hãy gọi (202) 879-4828.
 如需翻译, 请拨打 (202) 879-4828. 如需翻译, 请拨打 (202) 879-4828. 如需翻译, 请拨打 (202) 879-4828.

IMPORTANTE: SI USTED INCUMPLE CON PRESENTAR UNA CONTESTACIÓN EN EL PLAZO ANTES MENCIONADO O, SI LUEGO DE CONTESTAR, USTED NO COMPARECE CUANDO LE AVISE EL JUZGADO, PODRÍA DICTARSE UN FALLO EN REBELDÍA CONTRA USTED PARA QUE SE LE COBRE LOS DAÑOS Y PERJUICIOS U OTRO DESAGRAVIO QUE SE BUSQUE EN LA DEMANDA. SI ESTO OCURRE, PODRÍA RETENÉRSELE SUS INGRESOS, O PODRÍA TOMÁRSELE SUS BIENES PERSONALES O BIENES RAÍCES Y SER VENDIDOS PARA PAGAR EL FALLO. SI USTED PRETENDE Oponerse a esta acción, NO DEJE DE CONTESTAR LA DEMANDA DENTRO DEL PLAZO EXIGIDO.

Si desea conversar con un abogado y le parece que no puede pagarle a uno, llame pronto a una de nuestras oficinas del Legal Aid Society (202-628-1161) o el Neighborhood Legal Services (202-279-5100) para pedir ayuda o venga a la Oficina 5000 del 500 Indiana Avenue, N.W., para informarse sobre otros lugares donde puede pedir ayuda al respecto.

Vea al dorso el original en inglés
See reverse side for English original



Superior Court of the District of Columbia
CIVIL DIVISION
Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000 Washington, D.C. 20001
Telephone: (202) 879-1133 Website: www.dccourts.gov

MARKEISHA HEMSLEY

Plaintiff

vs.

Case Number **2021 CA 003339 M**

MOORE OBGYN, LLC

Defendant

SUMMONS

To the above named Defendant:

You are hereby summoned and required to serve an Answer to the attached Complaint, either personally or through an attorney, within twenty one (21) days after service of this summons upon you, exclusive of the day of service. If you are being sued as an officer or agency of the United States Government or the District of Columbia Government, you have sixty (60) days after service of this summons to serve your Answer. A copy of the Answer must be mailed to the attorney for the plaintiff who is suing you. The attorney's name and address appear below. If plaintiff has no attorney, a copy of the Answer must be mailed to the plaintiff at the address stated on this Summons.

You are also required to file the original Answer with the Court in Suite 5000 at 500 Indiana Avenue, N.W., between 8:30 a.m. and 5:00 p.m., Mondays through Fridays or between 9:00 a.m. and 12:00 noon on Saturdays. You may file the original Answer with the Court either before you serve a copy of the Answer on the plaintiff or within seven (7) days after you have served the plaintiff. If you fail to file an Answer, judgment by default may be entered against you for the relief demanded in the complaint.

Peter C. Grenier

Name of Plaintiff's Attorney

1920 L Street NW, Suite 750

Address

(202) 768-9600

Telephone

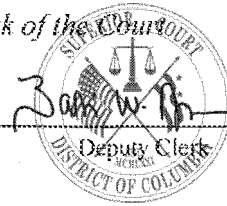
如需翻译, 请打电话 (202) 879-4828

Veuillez appeler au (202) 879-4828 pour une traduction

Để có một bản dịch, hãy gọi (202) 879-4828

번역을 원하시면, (202) 879-4828로 전화주세요. የአገልግሎት ለማግኘት (202) 879-4828 ይደውሉ

Clerk of the Court



By

Date

09/22/2021

IMPORTANT: IF YOU FAIL TO FILE AN ANSWER WITHIN THE TIME STATED ABOVE, OR IF, AFTER YOU ANSWER, YOU FAIL TO APPEAR AT ANY TIME THE COURT NOTIFIES YOU TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY DAMAGES OR OTHER RELIEF DEMANDED IN THE COMPLAINT. IF THIS OCCURS, YOUR WAGES MAY BE ATTACHED OR WITHHELD OR PERSONAL PROPERTY OR REAL ESTATE YOU OWN MAY BE TAKEN AND SOLD TO PAY THE JUDGMENT. IF YOU INTEND TO OPPOSE THIS ACTION, DO NOT FAIL TO ANSWER WITHIN THE REQUIRED TIME.

If you wish to talk to a lawyer and feel that you cannot afford to pay a fee to a lawyer, promptly contact one of the offices of the Legal Aid Society (202-628-1161) or the Neighborhood Legal Services (202-279-5100) for help or come to Suite 5000 at 500 Indiana Avenue, N.W., for more information concerning places where you may ask for such help.

See reverse side for Spanish translation

Vea al dorso la traducción al español



TRIBUNAL SUPERIOR DEL DISTRITO DE COLUMBIA
DIVISIÓN CIVIL

Sección de Acciones Civiles
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Teléfono: (202) 879-1133 Sitio web: www.dccourts.gov

_____ Demandante
contra

Número de Caso: _____

_____ Demandado

CITATORIO

Al susodicho Demandado:

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SECRETARIO DEL TRIBUNAL

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Por: _____

Dirección _____

Subsecretario

Fecha _____

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Vea al dorso el original en inglés
See reverse side for English original



SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION Civil Actions Branch
500 Indiana Avenue, N.W., Suite 5000, Washington, D.C. 20001
Telephone: (202) 879-1133 • Website: www.dccourts.gov

MARKEISHA HEMSLEY

Vs.

C.A. No. 2021 CA 003339 M

UNITED HEALTH GROUP, LLC et al

INITIAL ORDER AND ADDENDUM

Pursuant to D.C. Code § 11-906 and District of Columbia Superior Court Rule of Civil Procedure ("Super. Ct. Civ. R.") 40-I, it is hereby ORDERED as follows:

(1) This case is assigned to the judge and calendar designated below. All future filings in this case shall bear the calendar number and the judge's name beneath the case number in the caption.

(2) Within 60 days of the filing of the complaint, plaintiff must file proof of service on each defendant of copies of (a) the summons, (b) the complaint, and (c) this Initial Order and Addendum. The court will dismiss the claims against any defendant for whom such proof of service has not been filed by this deadline, unless the court extended the time for service under Rule 4(m).

(3) Within 21 days of service (unless otherwise provided in Rule 12), each defendant must respond to the complaint by filing an answer or other responsive pleading. The court may enter a default and a default judgment against any defendant who does not meet this deadline, unless the court extended the deadline under Rule 55(a).

(4) At the time stated below, all counsel and unrepresented parties shall participate in a remote hearing to establish a schedule and discuss the possibilities of settlement. Counsel shall discuss with their clients **before** the hearing whether the clients are agreeable to binding or non-binding arbitration. **This order is the only notice that parties and counsel will receive concerning this hearing.**

(5) If the date or time is inconvenient for any party or counsel, the Civil Actions Branch may continue the Conference **once**, with the consent of all parties, to either of the two succeeding Fridays. To reschedule the hearing, a party or lawyer may call the Branch at (202) 879-1133. Any such request must be made at least seven business days before the scheduled date.

No other continuance of the conference will be granted except upon motion for good cause shown.

(6) Parties are responsible for obtaining and complying with all requirements of the General Order for Civil cases, each judge's Supplement to the General Order and the General Mediation Order. Copies of these orders are available in the Courtroom and on the Court's website <http://www.dccourts.gov/>.

Chief Judge Anita M. Josey-Herring

Case Assigned to: Judge

Date: September 22, 2021

Initial Conference: **REMOTE HEARING - DO NOT COME TO COURTHOUSE
SEE REMOTE HEARING INSTRUCTIONS ATTACHED TO INITIAL ORDER**

Location:

ADDENDUM TO INITIAL ORDER AFFECTING ALL MEDICAL MALPRACTICE CASES

D.C. Code § 16-2821, which part of the Medical Malpractice Proceedings Act of 2006, provides, "[a]fter action is filed in the court against a healthcare provider alleging medical malpractice, the court shall require the parties to enter into mediation, without discovery or, if all parties agree[,] with only limited discovery that will not interfere with the completion of mediation within 30 days of the Initial Scheduling and Settlement Conference ('ISSC'), prior to any further litigation in an effort to reach a settlement agreement. The early mediation schedule shall be included in the Scheduling Order following the ISSC. Unless all parties agree, the stay of discovery shall not be more than 30 days after the ISSC."

To ensure compliance with this legislation, on or before the date of the ISSC, the Court will notify all attorneys and *pro se* parties of the date and time of the early mediation session and the name of the assigned mediator. Information about the early mediation date also is available over the internet at <https://www.dccourts.gov/pa/>. To facilitate this process, all counsel and *pro se* parties in every medical malpractice case are required to confer, jointly complete and sign an EARLY MEDIATION FORM, which must be filed no later than ten (10) calendar days prior to the ISSC. D.C. Code § 16-2825 Two separate Early Mediation Forms are available. Both forms may be obtained at www.dccourts.gov/medmalmediation. One form is to be used for early mediation with a mediator from the multi-door medical malpractice mediator roster; the second form is to be used for early mediation with a private mediator. Plaintiff's counsel is responsible for eFiling the form and is required to e-mail a courtesy copy to earlymedmal@dcsc.gov. Unrepresented plaintiffs who elect not to eFile must either mail the form to the Multi-Door Dispute Resolution Office at, Suite 2900, 410 E Street, N.W., Washington, DC 20001, or deliver it in person if the Office is open for in-person visits.

A roster of medical malpractice mediators available through the Court's Multi-Door Dispute Resolution Division, with biographical information about each mediator, can be found at www.dccourts.gov/medmalmediation/mediatorprofiles. All individuals on the roster are judges or lawyers with at least 10 years of significant experience in medical malpractice litigation. D.C. Code § 16-2823(a). If the parties cannot agree on a mediator, the Court will appoint one. D.C. Code § 16-2823(b).

The following people are required by D.C. Code § 16-2824 to attend personally the Early Mediation Conference: (1) all parties; (2) for parties that are not individuals, a representative with settlement authority; (3) in cases involving an insurance company, a representative of the company with settlement authority; and (4) attorneys representing each party with primary responsibility for the case.

No later than ten (10) days after the early mediation session has terminated, Plaintiff must eFile with the Court a report prepared by the mediator, including a private mediator, regarding: (1) attendance; (2) whether a settlement was reached; or, (3) if a settlement was not reached, any agreements to narrow the scope of the dispute, limit discovery, facilitate future settlement, hold another mediation session, or otherwise reduce the cost and time of trial preparation. D.C. Code § 16-2826. Any Plaintiff who is unrepresented may mail the form to the Civil Actions Branch at [address] or deliver it in person if the Branch is open for in-person visits. The forms to be used for early mediation reports are available at www.dccourts.gov/medmalmediation.

Chief Judge Anita M. Josey-Herring

Civil Remote Hearing Instructions for Participants

The following instructions are for participants who are scheduled to have cases heard before a Civil Judge in a **Remote Courtroom**

Option 1: (AUDIO ONLY/Dial-in by Phone):

Toll 1 (844) 992-4762 or (202) 860-2110, enter the Meeting ID from the attachment followed by #, press again to enter session.

- *Please call in no sooner than 5 minutes before your scheduled hearing time. Once you have joined the session, please place your phone on mute until directed otherwise. If you should happen to get disconnected from the call, please call back in using the phone number and access number provided and the courtroom clerk will mute your call until the appropriate time.*

If you select **Option 2** or **Option 3** use the Audio Alternative

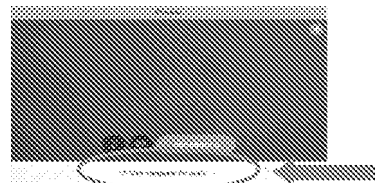
Option 2: (LAPTOP/ DESKTOP USERS 1):

Open Web Browser in Google Chrome and copy and paste following address from the next page:
<https://dccourts.webex.com/meet/XXXXXXXXXX>

Option 3: (LAPTOP/ DESKTOP USERS 2):

Open Web Browser in Google Chrome and copy and paste following address
<https://dccourts.webex.com> Select **Join**, enter the Meeting ID from the next page

AUDIO ALTERNATIVE: Instead of automatically using **USE COMPUTER FOR AUDIO**, select **CALL-IN** and follow the **CALL-IN** prompt window. Use a cell phone or desk phone. You will be heard clearer if you **do not** place your phone on **SPEAKER**. It is very important that you enter the **ACCESS ID #** so that your audio is matched with your video.



Option 4: (Ipad/SMART PHONE/TABLET):

- Go to App Store, Download WebEx App (Cisco WebEx Meetings)
- Sign into the App with your Name and Email Address
- Select Join Meeting
- Enter address from the next page: <https://dccourts.webex.com/meet/XXXXXXXXXX>
- Click join and make sure your microphone is muted and your video is unmuted (if you need to be seen). If you only need to speak and do not need to be seen, use the audio only option.
- When you are ready click "Join Meeting". If the host has not yet started the meeting, you will be placed in the lobby until the meeting begins.

For Technical Questions or issues Call: (202) 879-1928, Option #2

Superior Court of the District of Columbia
Public Access for Remote Court Hearings
(Effective August 24, 2020)

The current telephone numbers for all remote hearings are: 202-860-2110 (local) or 844-992-4726 (toll free). After dialing the number, enter the WebEx Meeting ID as shown below for the courtroom. Please click a WebEx Direct URL link below to join the hearing online.

Audio and video recording; taking pictures of remote hearings; and sharing the live or recorded remote hearing by rebroadcasting, live-streaming or otherwise are not allowed

Division	Courtroom	Types of Hearings Scheduled in Courtroom	Public Access via WebEx	
			WebEx Direct URL	WebEx Meeting ID
Auditor Master	206	Auditor Master Hearings	https://dccourts.webex.com/join/ctbaudmaster	129 648 5606
Civil	100	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	https://dccourts.webex.com/join/ctb100	129 846 4145
	205	Foreclosure Matters	https://dccourts.webex.com/join/ctb205	129 814 7399
	212	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	https://dccourts.webex.com/join/ctb212	129 440 9070
	214	Title 47 Tax Liens; and Foreclosure Hearings	https://dccourts.webex.com/join/ctb214	129 942 2620
	219	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	https://dccourts.webex.com/join/ctb219	129 315 2924
	221	Civil 1 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	https://dccourts.webex.com/join/ctb221	129 493 5162
	318	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	https://dccourts.webex.com/join/ctb318	129 801 7169
	320	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	https://dccourts.webex.com/join/ctb320	129 226 9879

400	Judge in Chambers Matters including Temporary Restraining Orders, Preliminary Injunctions and Name Changes	https://dccourts.webex.com/meet/ctb400	129 339 7379
415	Civil 2 Scheduling Conferences; Status, Motion and Evidentiary Hearings including Bench Trials	https://dccourts.webex.com/meet/ctb415	129 314 3475
516		https://dccourts.webex.com/meet/ctb516	129 776 4396
517		https://dccourts.webex.com/meet/ctb517	129 911 6415
518		https://dccourts.webex.com/meet/ctb518	129 685 3445
519		https://dccourts.webex.com/meet/ctb519	129 705 0412
JM-4		https://dccourts.webex.com/meet/ctbm4	129 797 7557
A-47	Housing Conditions Matters	https://dccourts.webex.com/meet/ctba47	129 906 2065
B-52	Debt Collection and Landlord and Tenant Trials	https://dccourts.webex.com/meet/ctbb52	129 793 4102
B-53	Landlord and Tenant Matters including Lease Violation Hearings and Post Judgment Motions	https://dccourts.webex.com/meet/ctbb53	129 913 3728
B-109	Landlord and Tenant Matters	https://dccourts.webex.com/meet/ctbb109	129 127 9276
B-119	Small Claims Hearings and Trials	https://dccourts.webex.com/meet/ctbb119	129 230 4882