

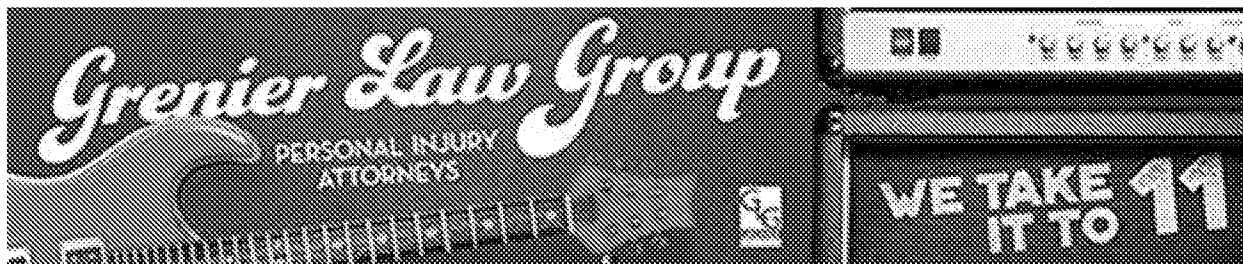
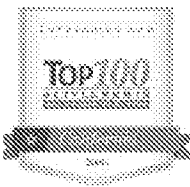
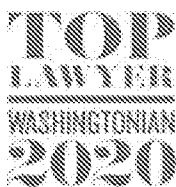
EXHIBIT 1

Lois Broughman

From: Peter Grenier <pgrenier@grenierlawgroup.com>
Sent: Friday, April 1, 2022 9:16 AM
To: Christopher J. Greaney; David Blum; Loni Graham; Stephanie Leacock
Cc: Thomas Monahan; Jhanelle Graham Caldwell
Subject: RE: Hemsley - Defendant Capital Women's Services Discovery Responses

Oh, we received the pdfs. They are just completely devoid of anything remotely resembling proper responses, as I am sure you would agree if you have read them. Let us know when you are available today for a meet and confer before we move to compel. If you need a copy of what you sent, let me know.

Peter C. Grenier, Esquire
GRENIER LAW GROUP PLLC
1920 L Street, N.W.
Suite 750
Washington, D.C. 20036-5004
Tel.: 202-768-9600
Direct: 202-768-9599
Toll-Free: 844-210-0333
Fax: 202-768-9604
pgrenier@grenierlawgroup.com
www.grenierlawgroup.com
www.dcbikelawyers.com



From: Christopher J. Greaney <CGreaney@verniclegal.com>
Sent: Friday, April 1, 2022 9:03 AM
To: Peter Grenier <pgrenier@grenierlawgroup.com>; David Blum <dblum@grenierlawgroup.com>; Loni Graham <lgraham@verniclegal.com>; Stephanie Leacock <sleacock@grenierlawgroup.com>
Cc: tvn@gdldlaw.com; Jhanelle Graham Caldwell <jcaldwell@gdldlaw.com>
Subject: RE: Hemsley - Defendant Capital Women's Services Discovery Responses

Good Morning,

I'm not sure if there was an issue with your accessing the full set of submissions sent out on Wednesday (if so, please confirm and we can re-send everything to you), but every request propounded was answered - across 30-some pages of written responses, accompanied by the production of 113 pages of responsive document discovery.

Christopher J. Greaney, Esq.
Vernick & Associates
111 Annapolis Street
Annapolis, Maryland 21401
443-333-4044 (office)
240-997-8012 (cell)
cgreaney@verniclegal.com

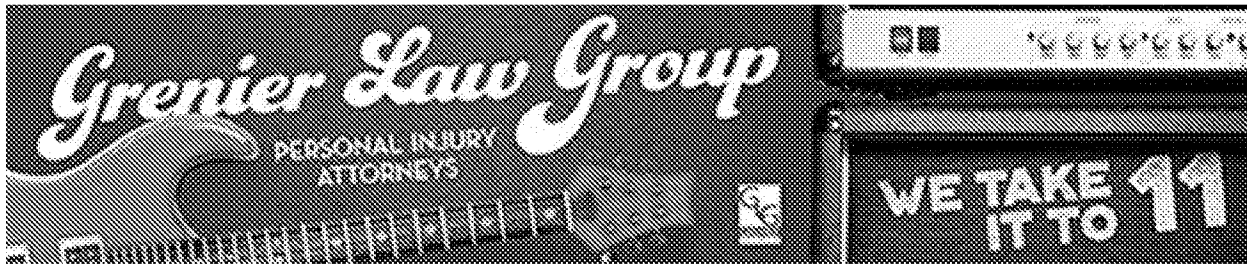
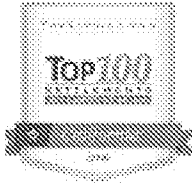
This message is intended for the exclusive use of the individual or entity that is the named addressee and may contain information that is privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee or an employee or agent responsible for delivering this message to the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify me immediately by e-mail, discard any paper copies and delete all electronic copies of the message. Thank you for your cooperation.

From: Peter Grenier <pgrenier@grenierlawgroup.com>
Sent: Wednesday, March 30, 2022 6:26 PM
To: Christopher J. Greaney <CGreaney@verniclegal.com>; David Blum <dblum@grenierlawgroup.com>; Loni Graham <lgraham@verniclegal.com>; Stephanie Leacock <sleacock@grenierlawgroup.com>
Cc: tvm@gdldlaw.com; Jhanelle Graham Caldwell <jcaldwell@gdldlaw.com>
Subject: RE: Hemsley - Defendant Capital Women's Services Discovery Responses

Perhaps I missed something, but I did not see any answers. I only saw objections. When will we be getting actual answers?

Peter C. Grenier, Esquire
GRENIER LAW GROUP PLLC
1920 L Street, N.W.
Suite 750
Washington, D.C. 20036-5004
Tel.: 202-768-9600
Direct: 202-768-9599
Toll-Free: 844-210-0333
Fax: 202-768-9604
pgrenier@grenierlawgroup.com
www.grenierlawgroup.com
www.dcbikelawyers.com

**TOP
LAWYER**
WASHINGTONIAN
2020



From: Christopher J. Greaney <CGreaney@verniclegal.com>

Sent: Wednesday, March 30, 2022 5:50 PM

To: David Blum <dblum@grenierlawgroup.com>; Loni Graham <lgraham@verniclegal.com>; Stephanie Leacock <sleacock@grenierlawgroup.com>

Cc: tvm@gdldlaw.com; Jhanelle Graham Caldwell <jcaldwell@gdldlaw.com>; Peter Grenier <pgrenier@grenierlawgroup.com>

Subject: RE: Hemsley - Defendant Capital Women's Services Discovery Responses

Attached please find our client's Answers to Plaintiff's Interrogatories.

Christopher J. Greaney, Esq.
Vernick & Associates
111 Annapolis Street
Annapolis, Maryland 21401
443-333-4044 (office)
240-997-8012 (cell)
cgreaney@verniclegal.com

This message is intended for the exclusive use of the individual or entity that is the named addressee and may contain information that is privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee or an employee or agent responsible for delivering this message to the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify me immediately by e-mail, discard any paper copies and delete all electronic copies of the message. Thank you for your cooperation.

EXHIBIT 2



Grenier Law Group PLLC

1920 L Street, NW, Suite 750
Washington, DC 20036

Office: 202.768.9600
Tollfree: 844.210.0333
Fax: 202.768.9604

www.grenierlawgroup.com

Peter C. Grenier

Direct: 202.768.9599
pgrenier@grenierlawgroup.com

April 14, 2022

VIA FIRST-CLASS AND ELECTRONIC MAIL

Khalilah Q. Jefferson
13103 Saint James Sanctuary Dr.
Bowie, MD 20720-6370
Email: khablessed@gmail.com

**Re: *Markeisha Hemsley v. United Health Group, LLC, et al.*
2021 CA 003339 M**

Dear Ms. Jefferson:

We have reviewed your discovery responses in the above matter and determined they are grossly deficient. This is especially concerning as we provided you with an extension to respond. Moreover, speaking on your behalf, your uncle, Dean Mosley, Esq., told me about many of your concerns and complaints to senior management, which you completely fail to mention in your response. If you fail to correct the following deficiencies by **April 21, 2022**, we will be forced to ask the Court to compel you to do so, and we will seek associated costs.

As a preliminary matter, your discovery responses (both Answers to Interrogatories and Responses to Requests for Production of Documents) are not signed. D.C. Superior Court Rule of Civil Procedure 26(g)(1) requires that "every discovery request, response, or objection must be signed by at least one attorney of record in the attorney's own name – **or by the party personally, if unrepresented** – and must state the signer's address, e-mail address, and telephone number." (emphasis added). Please supplement your responses with a signature compliant with the rules. I address specific deficiencies in more detail below:

Plaintiff's Interrogatories

1. Fully identify each person having knowledge of facts material to this case and indicate the content of their knowledge and subject matter they will testify to at trial.

ANSWER: Samantha McFadden, Tameka Hall, Farida Nasreen, Krystle Jones, Beyonka Holt, Denisha Riddick, Amani Mosley.

This response is incomplete. While you have provided names of persons, this Interrogatory asks you to fully identify each person. Per instruction (o) of Plaintiff's Interrogatories, when used in reference to a natural person, identify "means that person's **full name, last known address, home and business telephone numbers, and present occupation or business affiliation.**" Moreover, the Interrogatory asks you to indicate the content of each person's knowledge and the subject matter that each person will testify to at trial. You did not do so. Please fully respond to this Interrogatory.

2. Identify and list each of your employers during the period of January 1, 2010, through the present, including anyone or any entity for whose behalf you provided services to patients in your field of medical expertise as an agent or independent contractor and specifying the identity (including address) of your employer(s) at the time of your encounter with Ms. Hemsley.

ANSWER: I was not a Nurse Practitioner in 2010, I worked at Capital Women's Services from Feb 2018- March 2021.

This response is incomplete. This question asks for a list of your employers **since 2010**, and you merely noted the time period you worked for Capital Women's Services. Please provide a complete list of your employers, including their addresses as instructed. Perhaps you did not read the question carefully enough. It says "**including**" entities for whom you have provided patient services. It did not **limit** the scope of the question in any manner.

4. Identify the existence and contents of any insurance agreement under which any person (which includes any individual, corporation, partnership, or other association) carrying on an insurance business may be liable to satisfy the judgment, including the following information: a. The number(s) of any such polic(ies); b. The dates during which each policy was in effect; c. The amount of aggregate and per occurrence liability coverage provided in each policy and the named insured in each policy; and d. The identity of excess or umbrella policies which may be implicated by the matter alleged in Plaintiff's Complaint.

ANSWER: I had insurance with Lockton Affinity Health. Please find copy of policy attached as Exhibit A.

This response provides incorrect information. According to the listed insurance provider, you were not covered during this time period by the Lockton Affinity Health plan you attached in your responses to Plaintiff's Requests for Production. If there is no responsive insurance agreement to this Interrogatory, so state. Otherwise, provide a true response to this Interrogatory.

9. To the extent that you or any of your professional colleagues, employees, or agents have or has any memory of conversations/discussions/consultations with anyone else, concerning the Plaintiff, her patient history, the procedure, or your performance of the procedure, at either Capital Women's Services or Moore OBGYN, LLC, or both, please provide the substance of the conversation, the participants, and the date/time.

ANSWER: I only wanted to verify if the equipment at Capital Women's Services was adequate in revealing whether or not Ms. Hemsley had retained products or a uterine perforation.

This Answer is non-responsive. Your response appears to be a justification for why you brought Ms. Hemsley to Moore OBGYN, and not a response to an Interrogatory asking for the substance, participants, and date and time of conversations, discussions, and consultations concerning Ms. Hemsley. It expressly includes Capital Women's Services. Please respond properly to this Interrogatory.

11. Please identify each physician, employee, partner, agent, or individual involved with any part of the procedure at Capital Women's Services, including the scheduling, intake, pre-operative treatment, administration of medication, the procedure itself, and post-operative care. In doing so, please identify the role(s) each person performed with respect to the procedure.

ANSWER: I do not have access to any patient records, or recorders pertaining to Ms. Hemsley's procedure, because they were removed to offsite storage.

This is non-responsive. This Interrogatory requests that you identify (per instruction (o) of the Definitions and Instructions) all persons involved with any part of Ms. Hemsley's procedure. Your Answer to Interrogatory No. 1 contains several names of persons with knowledge of the procedure; presumably, some if not all of them were involved in any part of the procedure at Capital Women's Services. For example, are you swearing that you do not know the name of the person at Moore OBGYN whose assistance you sought? You know none of the persons who participated in any aspect of the procedure at Capital Women's Services? Please respond properly to this Interrogatory.

14. Fully identify in detail the number of second trimester abortions at the gestational age of 20 weeks that you performed prior to the procedure including, but not limited to, where second trimester abortion was performed, for whom it was performed, and under whose instruction it was performed.

ANSWER: I do not have access to any patient records that would enable me to answer this question.

This is non-responsive. It is unclear why you would need patient records to provide a response to this question, which asks for your personal experience. Please respond properly to this Interrogatory.

25. Please explain the factual basis for your notations on the "Abortion Procedure Record," concerning the procedure, including, but not limited to: the dilation of the cervix being recorded as 101 mm; the estimated blood loss being recorded as 25 ml; the procedure time ended being recorded as 3:45 PM; and the notation that "EMS contacted and given update pt transferred to GW Hospital."

ANSWER: At this time I do not have access to the patient medical record to confirm or deny the notations above.

This is non-responsive. You do not need access to the patient medical records to answer this question based on your personal knowledge and recollection, which is what you are required to do under the Rules. For your benefit, I have included the relevant portion of the medical record below:

Procedure Time Started: 2:15 am/pm Ended: 2:45 am/pm
Paracervical block: 30 mL 1% Lidocaine with 4unit Vasopressin, 4unit Oxytocin.
Cervix Dilated to 10+ mm. Cannula type: 10 mm flexible ☒ rigid
Sharp Curettage: ☒ YES ☐ NO Estimated Blood Loss: 25 ml. Procedure Tolerated: Well
Adjunctive measures used to facilitate removal of the fetus/placenta and/or to stop bleeding:
☒ Obstetrical maneuvers ☒ Uterine massage ☒ Monsel's solution application
☒ Forceps ☒ Silver nitrate cauterization ☒ CNS decompression using a firm vacurette
Practitioner's Comments: Cervix dilated without difficulty as documented above.
SPOM, uterine evacuated utilizing classic D&E procedure. All fetal
parts removed except part of placarantum. Upon Tr US placarantum
noted outside of uterus. EHU contacted & given
transferred to Caw Hospital. Ep 11/60, P 50, T 98.4
Page 1 of 2
HEM000004

Please respond to this Interrogatory properly.

26. Please explain in full and complete detail what equipment you believe was absent that you believe was necessary to perform the procedure, including whether said equipment was missing, refused, withheld, and/or otherwise unavailable when you were performing the procedure; whether you requested said equipment be provided at any point prior to or during the procedure; from whom you requested said equipment; and, if said equipment was refused, who refused said equipment.

ANSWER: I do not have access to records to confirm or deny the above statement. Because of continuing discovery the defendant reserves the right to respond once access to records is gained.

This is non-responsive. You can answer this question based on your personal knowledge and recollection and then supplement later on if records add more information. Please respond to this Interrogatory properly. Indeed, you gave Mr. Mosley details about this issue, your repeated – and rejected – requests for equipment that you believe you needed. Was he lying to me, or are you lying to us?

27. Please explain in full and complete detail what support you believe was absent that you believe was necessary for you to perform the procedure, including whether said support was missing, refused, withheld, and/or otherwise unavailable; whether you requested said support be provided at any point prior to or during the procedure; from whom you requested said support; and, if said support was refused, who refused said support.

ANSWER: I am unable to answer this question in its vague and ambiguous manner.

As with No. 26, this is non-responsive. You can answer this question based on your personal knowledge and recollection and then supplement later on if records add more information. Please respond to this Interrogatory properly. Again, was Mr. Mosley lying to me or are you lying to us?

28. Please explain in full and complete detail what medication was absent that was necessary for you to perform the procedure, including whether said medication was missing, refused, withheld, and/or otherwise unavailable; whether you requested said medication be provided at any point prior to or during the procedure; from whom you requested said medication; and, if said medication was refused, who refused said medication.

ANSWER: I am unable to answer this question without access to records.

As with No. 26 and No. 27 above, this is non-responsive. You can answer this question based on your personal knowledge and recollection and then supplement later on if records add more information. Please respond to this Interrogatory properly. Again, was Mr. Mosley lying to me or are you lying to us?

29. Please explain in full and complete detail whether equipment, medication, and/or support for an abortion was absent, missing, refused, withheld, or otherwise unavailable for any second trimester abortion that you performed and or assisted in at Capital Women's Services prior to the procedure, including the dates of the abortions, the individuals present at said abortions, and, if refused, who refused said equipment, medication, and/or support.

ANSWER: I am unable to answer this question because I do not have access to the records.

As with No. 26, No. 27, and No. 28 above, this is non-responsive. You can answer this question based on your personal knowledge and recollection and then supplement later on if records add more information. Please respond to this Interrogatory properly. Again, was Mr. Mosley lying to me or are you lying to us?

30. Please identify and describe in detail any communications between you and Steven Chase Brigham regarding the procedure.

ANSWER: The office manager on duty was informed of the procedure and the outcome and I assume that the office manager reported to Steven Chase Brigham and I may have spoken to him as well.

This response is evasive. Instruction (p) of the Definitions and Instructions of Plaintiff's Interrogatories states: "The terms 'identify' or 'identification,' when used with reference to a fact or occurrence of any kind, shall mean, without limitation, to state each of the following: **(1) the date, time, and place (including street address where appropriate) of the fact or**

occurrence, (2) a description of the circumstances surrounding the fact or occurrence, (3) an identification of all persons who were present at or have any personal knowledge of the fact or occurrence, and (4) the substance of the fact or the occurrence." You have not identified the office manager on duty and have merely stated that you "may" have spoken to Mr. Brigham. Please supplement this response with sufficient detail as required by the Rules.

Plaintiff's Requests for Production of Documents

5. All documents relating to any insurance agreement under which any person (which includes any individual, corporation, partnership, or association) carrying on an insurance business may be liable to satisfy part or all of any judgment which may be entered in this case or to indemnify or reimburse payments made to satisfy the judgment.

RESPONSE: I do not have any of the above mentioned documents.

You provided an insurance policy from Lockton Affinity Health that, according to your Answer to Interrogatory No. 4, would be responsive to this Request. However, as noted above, Lockton Affinity Health has stated they do not cover you for this incident. Please correct this disjunction with a valid response as to whether there is or is not an insurance agreement that would be satisfy part or all of any judgment which may be entered in this case or to indemnify or reimburse payments made to satisfy the judgment.

6. All documents reflecting any communications with insurance carriers or trusts that relate, reflect, or refer to Plaintiff, which were created prior to your learning of the fact that Plaintiff intended to pursue claims arising out of the events described in Plaintiff's Complaint.

RESPONSE: I do not have any of the above mentioned documents.

Please see the above in regard to Response No. 5.

26. All documents you maintain support any of your defenses in this action and/or upon which you intend to rely at trial.

RESPONSE: I do not have access to any documents at this time.

This response is not true. You provided documents to us in response to Requests for Production. If you do not have access to certain documents, **please identify them to us and indicate their location**. Otherwise, produce documents supporting your defenses.

40. All documents evidencing communications concerning Ms. Hemsley and/or the Surgery between you and the following individuals:

- a. Christina Brathwaite;
- b. Myron Rose, M.D.;
- c. Steven Brigham;
- d. Javaka Moore, M.D.;
- e. Any other persons involved with the procedure on October 25, 2018.

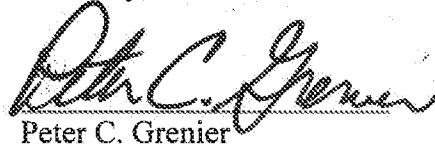
RESPONSE: I do not have any documents.

For this response to be correct, that means that you did not text, email, direct message, or call any of the aforementioned individuals concerning Ms. Hemsley. You already stated in your answers to Plaintiff's interrogatories that you called Ms. Brathwaite to confirm that it was fine to bring Ms. Hemsley to Moore OBGYN, that you spoke to the office manager on duty that day, and that you "may" have spoken to Steven Brigham on the day of the Surgery. If you do not have access to certain documents, please identify them to us and indicate their location. Otherwise, produce documents evidencing your communications concerning Ms. Hemsley and/or the Surgery between you and the listed individuals.

* * *

We are hopeful that we can resolve the issues outlined above without Court intervention. Please provide Plaintiff with full and complete Answers and Responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents by April 21, 2022, or we will file a Motion to Compel Discovery, and will seek an award of attorney's fees and expenses. If you have any questions, please contact me as soon as possible to resolve this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter C. Grenier", written over a horizontal line.

Peter C. Grenier

EXHIBIT 3

Lois Broughman

From: Jhanelle Graham Caldwell
Sent: Monday, April 18, 2022 11:52 AM
To: David Blum
Cc: Stephanie Leacock; Peter Grenier; Nancy Grenier; Lois Broughman; Thomas Monahan
Subject: RE: Hemsley v. Jefferson, et. al.

David:

We will answer the Complaint within the 14 days permitted by the D.C. rules, and we will respond to the Plaintiff's written discovery requests within 30 days—i.e., on or before May 18, 2022. I anticipate that we will receive dates for both witnesses promptly thereafter.

I await your motion to compel.

Jhanelle



Jhanelle A. Graham Caldwell
GOODELL, DEVRIES, LEECH & DANN, LLP
One South Street, 20th Floor
Baltimore, MD 21202
jcaldwell@gdldlaw.com (e-mail)
410-783-4050 (direct telephone)
410-783-4000 (firm telephone)
410-783-4040 (firm fax) | www.gdldlaw.com

IMPORTANT CONFIDENTIALITY NOTICE

This message from the law firm of Goodell, DeVries, Leech & Dann, LLP contains information that may be privileged, confidential, and protected from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please reply to the sender that you have received the message in error, or notify us immediately at telephone number (410) 783-4000, and delete the message.

From: David Blum <dblum@grenierlawgroup.com>
Sent: Monday, April 18, 2022 11:44 AM
To: Jhanelle Graham Caldwell <jcaldwell@gdldlaw.com>
Cc: Stephanie Leacock <sleacock@grenierlawgroup.com>; Peter Grenier <pgrenier@grenierlawgroup.com>; Nancy Grenier <ngrenier@grenierlawgroup.com>; Lois Broughman <llb@gdldlaw.com>; Thomas Monahan <tvm@gdldlaw.com>
Subject: RE: Hemsley v. Jefferson, et. al.

Jhanelle,

Given that you were served with Discovery over two months ago, we will give you fourteen (14) days to respond to our discovery, so May 2, 2022. If we do not have it by then, we will file a Motion to Compel the next day. We will not be providing availability for either witness for deposition until you have responded to our discovery.

Thanks.

David W. Blum
Associate Attorney
202.768.9615
1920 L Street, N.W., Suite 750
Washington, D.C. 20036
Grenier Law Group PLLC
Fax: 202.768.9604
www.grenierlawgroup.com



From: Jhanelle Graham Caldwell <jcaldwell@gddlaw.com>
Sent: Monday, April 18, 2022 11:37 AM
To: David Blum <dblum@grenierlawgroup.com>
Cc: Stephanie Leacock <sleacock@grenierlawgroup.com>; Peter Grenier <pgrenier@grenierlawgroup.com>; Nancy Grenier <ngrenier@grenierlawgroup.com>; Lois Broughman <lib@gddlaw.com>; Thomas Monahan <tvm@gddlaw.com>
Subject: RE: Hemsley v. Jefferson, et. al.

David:

We will provide Answers to Plaintiff's Interrogatories and Responses to Plaintiff's Requests for Production of Documents within 30 days.

Please provide dates for the depositions of Ms. Hemsley and Ms. Washington, to proceed remotely.

Regards,
Jhanelle



Jhanelle A. Graham Caldwell
GOODELL, DEVRIES, LEECH & DANN, LLP
One South Street, 20th Floor
Baltimore, MD 21202
jcaldwell@gddlaw.com (e-mail)
410-783-4050 (direct telephone)
410-783-4000 (firm telephone)
410-783-4040 (firm fax) | www.gddlaw.com

IMPORTANT CONFIDENTIALITY NOTICE

This message from the law firm of Goodell, DeVries, Leech & Dann, LLP contains information that may be privileged, confidential, and protected from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please reply to the sender that you have received the message in error, or notify us immediately at telephone number (410) 783-4000, and delete the message.

From: David Blum <dblum@grenierlawgroup.com>

Sent: Monday, April 18, 2022 11:31 AM

To: Jhanelle Graham Caldwell <jcaldwell@gdldlaw.com>

Cc: Stephanie Leacock <sleacock@grenierlawgroup.com>; Peter Grenier <pgrenier@grenierlawgroup.com>; Nancy Grenier <ngrenier@grenierlawgroup.com>; Lois Broughman <lfb@gdldlaw.com>; Thomas Monahan <tvm@gdldlaw.com>

Subject: RE: Hemsley v. Jefferson, et. al.

Jhanelle,

Please advise as to when we can expect your discovery responses. Thanks.

David W. Blum
Associate Attorney
202.768.9615
1920 L Street, N.W., Suite 750
Washington, D.C. 20036
Grenier Law Group PLLC
Fax: 202.768.9604
www.grenierlawgroup.com

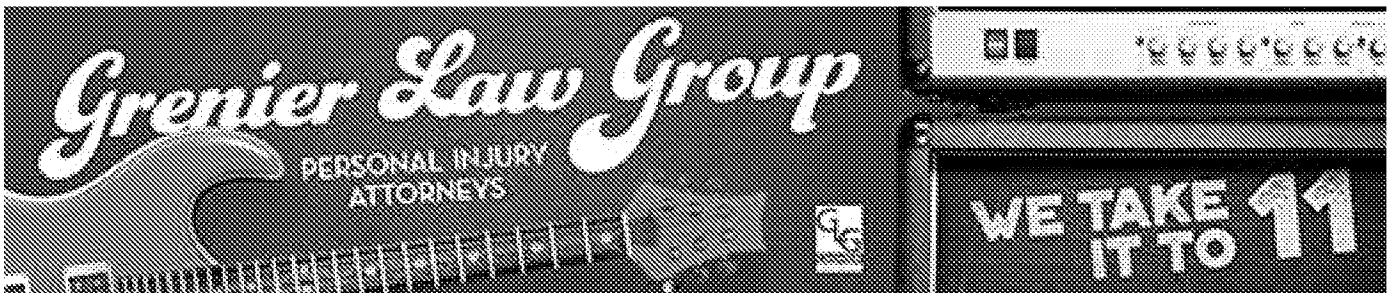


EXHIBIT 4

IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
Civil Division

MARKEISHA HEMSLEY

*

Plaintiff

*

Civil Action No. 2021 CA 003339 M

v.

*

The Honorable Robert R. Rigsby

KHALILAH Q. JEFFERSON, et al.

*

Next Event: Fact Witness List Due
5/31/2022

Defendants

*

*

*

*

*

*

*

*

*

*

*

*

*

NOTICE OF SERVICE OF DISCOVERY MATERIALS

I HEREBY CERTIFY that on this 4th day of May, 2022, a copy of Moore OBGYN, LLC's
Answers to Plaintiff's Interrogatories and a copy of this Notice of Service of Discovery Materials
were served via CaseFile*Xpress* and/or electronic mail to:

Peter C. Grenier, Esquire
David W. Blum, Esquire
Grenier Law Group PLLC
1920 L Street, NW, Suite 750
Washington, DC 20036
Attorneys for Plaintiff

Andrew E. Vernick, Esquire
Christopher Greaney, Esquire
Vernick and Associates, LLC
111 Annapolis Street
Annapolis, Maryland 21401
***Attorneys for Defendant United Health
Group, LLC, d/b/a Capital Women's
Services***

Khalilah Q. Jefferson
13103 Saint James Sanctuary Drive
Bowie, Maryland 20720-6370
Defendant (Pro Se)

Respectfully Submitted,

/s/ Jhanelle Graham Caldwell

Thomas V. Monahan, Jr. (Bar# 457213)
tvm@gdldlaw.com
Jhanelle Graham Caldwell (Bar# 1033360)
jcaldwell@gdldlaw.com
Goodell, DeVries, Leech & Dann, LLP
One South Street, 20th Street
Baltimore, Maryland 21202
(410) 783-4000
Attorneys for Defendant Moore OBGYN, LLC

IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
Civil Division

MARKEISHA HEMSLEY

*

Plaintiff

*

Civil Action No. 2021 CA 003339 M

v.

*

The Honorable Robert R. Rigsby

KHALILAH Q. JEFFERSON, et al.

*

Next Event: Fact Witness List Due
5/31/2022

Defendants

*

*

*

*

*

*

*

*

*

*

*

*

*

NOTICE OF SERVICE OF DISCOVERY MATERIALS

I HEREBY CERTIFY that on this 4th day of May, 2022, a copy of Moore OBGYN, LLC's Responses to Plaintiff's Request for Production of Documents and a copy of this Notice of Service of Discovery Materials were served via CaseFile*Xpress* and/or electronic mail to:

Peter C. Grenier, Esquire
David W. Blum, Esquire
Grenier Law Group PLLC
1920 L Street, NW, Suite 750
Washington, DC 20036
Attorneys for Plaintiff

Andrew E. Vernick, Esquire
Christopher J. Greaney, Esquire
Vernick and Associates, LLC
111 Annapolis Street
Annapolis, Maryland 21401
*Attorneys for Defendant United Health
Group, LLC, d/b/a Capital Women's
Services*

Khalilah Q. Jefferson
13103 Saint James Sanctuary Drive
Bowie, Maryland 20720-6370
Defendant (Pro Se)

Respectfully Submitted,

/s/ Jhanelle Graham Caldwell

Thomas V. Monahan, Jr. (Bar# 457213)
tvm@gdldlaw.com
Jhanelle Graham Caldwell (Bar# 1033360)
jcaldwell@gdldlaw.com
Goodell, DeVries, Leech & Dann, LLP
One South Street, 20th Street
Baltimore, Maryland 21202
(410) 783-4000
Attorneys for Defendant Moore OBGYN, LLC

EXHIBIT 5

Lois Broughman

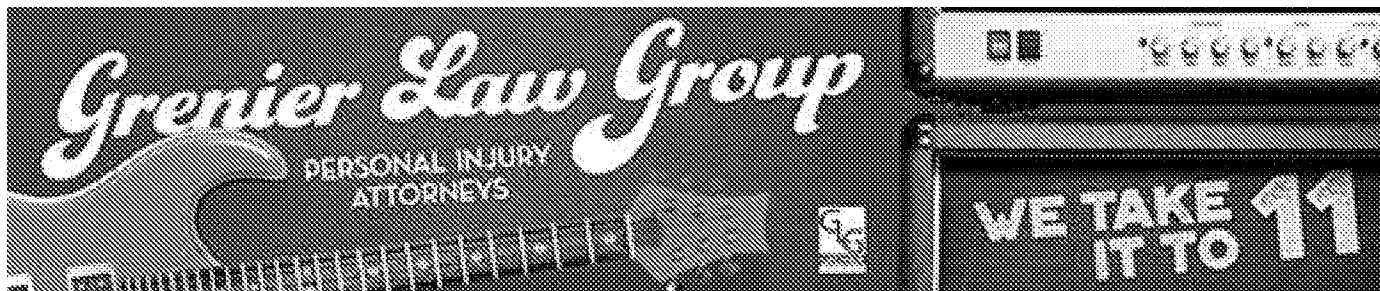
From: David Blum <dblum@grenierlawgroup.com>
Sent: Thursday, May 5, 2022 3:41 PM
To: Jhanelle Graham Caldwell
Cc: Stephanie Leacock; Peter Grenier; Alyssa Barton
Subject: RE: Hemsley v. Jefferson, et. al.

Jhanelle,

We are still in the process of reviewing what you have provided. We will not be withdrawing our Motion at this time.

Regards,

David W. Blum
Associate Attorney
202.768.9615
1920 L Street, N.W., Suite 750
Washington, D.C. 20036
Grenier Law Group PLLC
Fax: 202.768.9604
www.grenierlawgroup.com



From: Jhanelle Graham Caldwell <jcaldwell@gdldlaw.com>
Sent: Wednesday, May 4, 2022 9:50 PM
To: David Blum <dblum@grenierlawgroup.com>; Peter Grenier <pgrenier@grenierlawgroup.com>
Subject: Re: Hemsley v. Jefferson, et. al.

Peter and David:

You have now received Moore OBGYN, LLC's responses to the Plaintiff's written discovery requests. As you can see, Moore OBGYN does not have any records regarding Ms. Hemsley.

Tomorrow is the deadline for Moore OBGYN to respond to the Plaintiff's Motion for Leave to File a Motion to Compel. Please let me know whether you will withdraw your motion having received these written discovery responses.

Regards,
Jhanelle

Jhanelle A. Graham Caldwell
GOODELL, DEVRIES, LEECH & DANN, LLP
One South Street, 20th Floor
Baltimore, MD 21202
jcaldwell@gddlclaw.com (e-mail)
410-783-4050 (direct telephone)
410-783-4000 (firm telephone)
410-783-4040 (firm fax) | www.gddlclaw.com

IMPORTANT CONFIDENTIALITY NOTICE

This message from the law firm of Goodell, DeVries, Leech & Dann, LLP contains information that may be privileged, confidential, and protected from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited. If you have received this communication in error, please reply to the sender that you have received the message in error, or notify us immediately at telephone number (410) 783-4000, and delete the message.

From: Lois Broughman <llb@gddlclaw.com>
Sent: Wednesday, May 4, 2022 5:57 PM
To: David Blum <dblum@grenierlawgroup.com>; pgrenier@grenierlawgroup.com <pgrenier@grenierlawgroup.com>
Cc: dr.khalilahjefferson@gmail.com <dr.khalilahjefferson@gmail.com>; Andy Vernick <avernick@vernicklegal.com>; Christopher J. Greaney <CGreaney@vernicklegal.com>; Thomas Monahan <tvm@gddlclaw.com>; Jhanelle Graham Caldwell <jcaldwell@gddlclaw.com>
Subject: Hemsley v. Jefferson, et. al.

Good afternoon.

Attached please find the following documents which have also been filed and served via CaseFileXpress in the above-referenced matter:

1. Moore OBGYN, LLC's Answers to Plaintiff's Interrogatories;
2. Moore OBGYN, LLC's Responses to Plaintiff's Request for Production of Documents;
3. Moore OBGYN, LLC's Interrogatories to Plaintiff; and
4. Moore OBGYN, LLC's Request for Production of Documents to Plaintiff.

Please let me know if you have any problems with the attachments.

Thank you.

Lois L. Broughman
*Legal Assistant to Thomas V. Monahan, Jr.,
Jhanelle Graham Caldwell and Sean Gugerty*
GOODELL, DEVRIES, LEECH & DANN, LLP
One South Street, 20th Floor
Baltimore, MD 21202
llb@gddlclaw.com (e-mail)
410-649-2953 (direct telephone)
410-783-4000 (firm telephone)
410-783-4040 (firm fax) | www.gddlclaw.com



IMPORTANT CONFIDENTIALITY NOTICE

This message is from the law firm of Goodell, DeVries, Leech & Dann, LLP and contains information that may be

privileged, confidential, and protected from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is strictly prohibited.

If you have received this communication in error, please reply to the sender that you have received the message in error and delete the message or notify us immediately at our telephone number: 410-783-4000. Thank you.