

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Civil Division

MARKEISHA HEMSLEY)	
)	
Plaintiff,)	
)	
v.)	2021 CA 003339 M
)	Judge Robert R. Rigsby
KHALILAH Q. JEFFERSON, et al.)	Next Event: Exchange of Fact Witnesses
)	May 31, 2022
Defendants.)	
)	

**PLAINTIFF’S OPPOSED MOTION TO COMPEL DISCOVERY FROM
DEFENDANT KHALILAH Q. JEFFERSON, FOR SANCTIONS, AND
REQUEST FOR EXPEDITED RULING**

Plaintiff Markeisha Hemsley, by and through undersigned counsel and pursuant to Super. Ct. Civ. R. 37, respectfully moves to compel discovery responses from Defendant Khalilah Q. Jefferson (“Jefferson”) and for appropriate sanctions. Despite Plaintiff granting Jefferson multiple extensions and notifying her of the specific issues with her responses, Jefferson has **never** produced signed discovery responses, and those answers to interrogatories and documents she has produced are insufficient at best. Pursuant to Super. Ct. Civ. R. 26(g)(2), Plaintiff notified Jefferson of the lack of signature on her responses via letter on April 14, 2022, and she has failed to supplement. Therefore, under Super Ct. Civ. R. 26(g)(2), her responses must be struck. So stricken, Jefferson is nearly two months late in producing valid, sufficient responses to Plaintiff’s discovery, and the Court should compel her to do so. The Court should GRANT this Motion for the following reasons:

1. On February 14, 2022, Plaintiff served Jefferson with Plaintiff’s First Set of Interrogatories and Requests for Production of Documents. Under Super. Ct. Civ. R. 33 and 34, Jefferson’s discovery responses were due on March 16, 2022. See Pl.’s Ex. 1, Certificate

Regarding Discovery.

2. On March 14, 2022, Jefferson requested an extension of her deadline to respond until April 4, 2022. Plaintiff consented to her request. *See* Pl.'s Ex. 2, Mar. 14, 2022, Emails.

3. On April 4, 2022, Jefferson served Plaintiff with **unsigned** Answers to Interrogatories and Requests for Production of Documents, producing three (3) total documents in response to forty-nine (49) total requests. Under Super. Ct. Civ. R. 26(g)(2), the lack of signature rendered Jefferson's responses invalid, and Plaintiff was under no obligation to acknowledge them.

4. Nevertheless, on April 14, 2022, Plaintiff sent a letter to Jefferson via first-class and electronic mail notifying her that her responses were unsigned and invalid, and otherwise outlining the myriad other deficiencies in her discovery responses. Plaintiff gave Jefferson until April 21, 2022, to supplement her responses. *See* Pl.'s Ex. 3, Letter of Apr. 14, 2022.

5. Jefferson did not respond by April 21, 2022. On April 22, 2022, Plaintiff contacted Jefferson via electronic mail, offering availability for a Super. Ct. Civ. R. 37 meet-and-confer to discuss the ongoing discovery dispute. *See* Pl.'s Ex. 4, E-Mail of Apr. 22, 2022. Plaintiff offered dates through April 29, 2022, to discuss the dispute, but informed Jefferson that Plaintiff would file a Motion to Compel if she did not respond by April 27, 2022.

6. On April 27, 2022, Jefferson emailed Plaintiff's counsel asking for another extension to respond to discovery, this time to May 12, 2022. Notably, **Jefferson did not supplement her responses with a signature**, meaning that pursuant to Super. Ct. Civ. R. 26(g)(2), the Court **must** strike her responses.

7. Given Jefferson's delaying tactics and serial non-compliance with the discovery rules thus far, any further extension would likely be a waste of time. Plaintiff is loath to involve

the Court in discovery disputes (as evidenced by the multiple extensions and grace periods already extended), but Jefferson's conduct leaves no other choice. Pursuant to Super. Ct. Civ. R. 37, Plaintiff asks the Court for an Order compelling Jefferson to produce **valid, signed, and rules-compliant discovery responses** by May 6, 2022, for appropriate attorneys' fees and costs associated with the preparation of this Motion, and for other such sanctions as the Court may deem proper.

I. BACKGROUND

On October 25, 2018, Plaintiff Markeisha Hemsley presented to Defendant Capital Women's Services ("CWS") facility at 6323 Georgia Ave, NW, Suite 210, Washington, DC 20011, for a routine second trimester abortion. Plaintiff was 20.3 weeks pregnant at the time. Tragically, the way the procedure progressed was anything but routine. In the course of the procedure, Defendant Jefferson, an employee of CWS at the time, committed numerous violations of the standard of care, which caused the fetal calvarium to become lodged in Ms. Hemsley's abdomen through her perforated uterus. Ms. Hemsley was in immense pain and suffering from internal bleeding, and the standard of care dictated that once there was a problem, such patients are to be rushed to the hospital where adequate medical equipment to treat them exists. Instead, Jefferson informed Ms. Hemsley and her mother, Dora Washington, that she was going to take them to "the other office where [she] work[ed]." Jefferson then called Christina Brathwaite, a sonographer at Defendant Moore OBGYN, LLC ("Moore") to see if she was available to assist her. After Ms. Brathwaite assented to Jefferson bringing Plaintiff to Moore's facility, Jefferson personally transported Ms. Hemsley in Jefferson's own vehicle to Moore's facility in Greenbelt, Maryland. Upon arrival, Jefferson and Ms. Hemsley entered Moore's Greenbelt, Maryland office with Ms. Brathwaite's assistance. Jefferson and Ms. Brathwaite then proceeded with an illegal

surgical abortion procedure¹ on Ms. Hemsley in Moore's facility. Ms. Hemsley was grievously injured by the procedures at both CWS and Moore and had to be rushed to the hospital via ambulance, where she underwent emergency surgery to address the grievous injuries inflicted by Defendants.

Plaintiff filed the Complaint in this matter on September 21, 2021, against all three Defendants, alleging medical negligence amongst other counts. Jefferson filed her answer *pro se* on November 3, 2021. While no attorney has entered an appearance for Jefferson, a man claiming that he was her uncle and that he represented her, Dean Mosley, contacted Plaintiff's counsel on or about January 20, 2022, and claimed that Jefferson had several documents in her possession relevant to the case. However, Mr. Mosley said that she would only produce the documents if Plaintiff dismissed Jefferson out of the case with prejudice. *See* Pl.'s Ex. 5, E-Mail Chain with Dean Mosley. Plaintiff refused the offer and served Jefferson with Interrogatories and Requests for Production on February 14, 2022, meaning that under Super. Ct. Civ. R. 33 and 34, responses were due on March 16, 2022. Plaintiff granted Jefferson's request to extend her time to respond until April 4, 2022, but the responses she produced on that date were unsigned, invalid, and insufficient, notably lacking many of the documents Mr. Mosley had represented she had in her possession. Plaintiff notified Jefferson of the invalidity and insufficiency of her response via letter on April 14, 2022. Jefferson has neither produced anything else in response, nor signed her previously produced responses.

II. LEGAL STANDARD

Under Super. Ct. Civ. R. 26(g)(1), “[e]very 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**

¹Under Md. Code Ann., Health-Gen § 20-208 (LexisNexis 1991), surgical abortions cannot take place without the presence of a licensed physician.

personally, if unrepresented – and must state the signer’s address, e-mail address, and telephone number.” (emphasis added). If a request, response, or objection is not signed, other parties have no duty to act on it and “**the court must strike it unless a signature is promptly supplied after the omission is called to the attorney’s or party’s attention.**” Super. Ct. Civ. R. 26(g)(2).

“Parties may obtain discovery regarding any nonprivileged matter that is relevant to any party’s claim or defense and proportional to the needs of the case, considering the importance of the issues at stake in the action, the amount in controversy, the parties’ relative access to relevant information, the parties’ resources, the importance of the discovery in resolving the issues, and whether the burden or expense of the proposed discovery outweighs its likely benefit.” Super. Ct. Civ. R. 26(b)(1). “Relevancy to the subject matter is construed most liberally, to the point that discovery should be granted where there is any possibility that the information sought may be relevant to the subject matter of the action.” *Daniels v. Potomac Electric Power Co.*, 100 A.3d 139, 145 (D.C. 2014) (quotations and citation omitted).

“A party upon whom a proper discovery request is served has three legitimate options: (i) he may provide the requested discovery on time; (ii) he may obtain consent from the discovering party to extend the deadline for responding; or (iii) he may move, prior to the due date, for an extension of time.” *Woodruff v. McConkey*, 114 W.L.R. 2293 (Super. Ct. 1993) *rev’d on other grounds in Woodruff v. McConkey*, 524 A.2d 722 (1987). Parties have a duty to engage in discovery. *See District of Columbia v. Kora & Williams Corp.*, 743 A.2d 682 (D.C. 1999); *Williams v. Washington Hosp. Ctr.*, 601 A.2d 28 (D.C. 1991). A pro se litigant “must not expect or seek concessions because of her inexperience and lack of trial knowledge and training and **must, when acting as her own lawyer, be bound by and conform to the rules of court procedure** equally binding upon members of the bar.” *Solomon v. Fairfax Vill. Condo. IV Unit*

Owner's Ass'n, 621 A.2d 378, 380 n.2 (D.C. 1993) (quoting *Paton v. Rose*, 191 A.2d 455 (D.C. 1963)).

III. ARGUMENT

Neither Jefferson's Answers to Plaintiff's Interrogatories nor Jefferson's Responses to Plaintiff's Requests for Production are signed, as mandated by Super. Ct. Civ. R. 26. Plaintiff has called this lack of signature to Jefferson's attention, but Jefferson has ignored this request. Therefore, under Super. Ct. Civ. R. 26(g)(2), the Court **must** strike all responses by Jefferson, and compel Jefferson to produce signed responses that are compliant with the rules.

To ensure that Jefferson does not produce insufficient responses, Plaintiff will detail below the specific deficiencies in the invalid and insufficient responses provided by Jefferson thus far:

Interrogatory 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. Jefferson provided the names of persons, but failed to fully identify each person listed, meaning full name, last known address, home and business telephone numbers, and present occupation or business affiliation. Moreover, Interrogatory 1 asked that Jefferson indicate the content of each identified person's knowledge and the subject matter that each identified person would testify to at trial, which Jefferson did not do.

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, [sic] I worked at Capital Women's Services from Feb 2018- March 2021.

This response is also incomplete. Jefferson merely noted the period of time that she worked for Defendant CWS, completely neglecting the period of time between January 1, 2010, and January 31, 2018. Plaintiff is entitled to this information to obtain a better understanding of Jefferson's experience, which is relevant to Plaintiff's claims against Jefferson and the other Defendants.

Interrogatory 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 [sic] copy of [sic] policy attached as Exhibit A.

This response provides incorrect information. According to the listed insurance provider, Jefferson was not covered during this time period by the Lockton Affinity Health plan attached to her responses to Plaintiff's Requests for Production. Plaintiff is entitled to know what the responsive insurance agreement is, or to a confirmation that there is no responsive insurance agreement.

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. Jefferson's Answer is a justification for why she took Ms. Hemsley to Moore's Greenbelt facility; but that was in no way the question asked. Plaintiff is entitled to an actual answer to Interrogatory 9.

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 answer is non-responsive. Jefferson does not need access to the records of the procedure to identify who was involved in the second trimester abortion performed on Ms. Hemsley at Capital Women's Services. Jefferson identifies several people in her response to Interrogatory 1. Presumably, several of these people were involved in Ms. Hemsley's care. Plaintiff is entitled to a response to this Interrogatory as it directly relates to her claims against Defendants.

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.

Again, this answer is non-responsive. Why Jefferson would need patient records to respond to this Interrogatory is a mystery. This Interrogatory requests information about Jefferson's personal experience regarding a very specific procedure, experience of which she should be keenly aware.

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 answer is non-responsive. Jefferson does not need access to Ms. Hemsley's patient records to confirm or deny the listed notations. Jefferson's personal knowledge and recollection are enough. Plaintiff is entitled to a proper answer to this Interrogatory as it relates to the substance of her claims against Jefferson.

Interrogatory 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 answer is non-responsive. Jefferson's memory of the incident should be sufficient to answer this Interrogatory. Furthermore, based upon representations by Mr. Mosley, Jefferson possesses communications that detail her requests for equipment that she believed she needed that she did not have access to for the procedure. Plaintiff is entitled to this information insofar as it exists as it relates to the substance of her claims against Jefferson and Defendant CWS.

Interrogatory 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.

This answer is non-responsive. Jefferson's memory of the incident should be sufficient to answer this Interrogatory. As with Interrogatory 26, based upon representations made by Mr. Mosley, Jefferson possesses communications that detail her requests for support that she believed she needed that she did not have access to for the procedure. Plaintiff is entitled to this information insofar as it exists as it relates to the substance of her claims against Jefferson and Defendant CWS.

Interrogatory 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.

This answer is non-responsive. Jefferson's memory of the incident should be sufficient to answer this Interrogatory. As with Interrogatories 26 and 27, based on representations made by Mr. Mosley, Jefferson possesses records of communications that detail her requests for medication that she believed she needed that she did not have access to for the procedure. Plaintiff is entitled to this information insofar as it exists as it relates to the substance of her claims against Jefferson and Defendant CWS.

Interrogatory 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.

This answer is non-responsive. Jefferson's memory of the incident should be sufficient to answer this Interrogatory. As with Interrogatories 26, 27, and 28, based on representations made by Mr. Mosley, Jefferson possesses communications that detail her requests for equipment, medication, and/or support that she believed she needed that she did not have access to for the procedure. Plaintiff is entitled to this information insofar as it exists as it relates to the substance of her claims against Jefferson and Defendant CWS.

Interrogatory 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 answer is evasive and meant to obstruct Plaintiff's discovery of evidence and information that she is entitled to. 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.**" Jefferson did not identify the office manager on duty and merely stated that she "may" have spoken to Mr. Brigham. Plaintiff is entitled to the identity of the office manager on duty on the day of the procedure and to what communications occurred between Jefferson and Mr. Brigham regarding the procedure as they directly relate to Plaintiff's claims against Jefferson and Defendant CWS.

Request 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 [sic] documents.

This response is incorrect. The Lockton Affinity Health plan would have been responsive to this Request. However, as noted above, the Lockton Affinity Health plan did not cover Jefferson for this incident. Jefferson must correct the disjunction between her answer to Interrogatory 4 as to whether there is an applicable insurance agreement that would satisfy all or

part of any judgment entered against her in this case, or to indemnify or reimburse payments made to satisfy the judgment.

Request 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 [sic] documents.

This response is incorrect. The Lockton Affinity Health plan would have been responsive to this Request. However, as noted in the deficiencies to Jefferson's answer to Interrogatory 4, the Lockton Affinity Health plan did not cover Jefferson for this incident. Jefferson must correct the disjunction between her answer to Interrogatory 4 as to whether there is an applicable insurance agreement that would satisfy all or part of any judgment entered against her in this case, or to indemnify or reimburse payments made to satisfy the judgment.

Request 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 incorrect and unresponsive. Jefferson provided documents to Plaintiff in response to Plaintiff's Request for Production. Furthermore, Jefferson must identify any and all documents that she intends to use to support her defenses that she does not have access to at this time and indicate their location to Plaintiff.

Request 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.

This response is simply not believable. For this response to be correct, that means that Jefferson did not text, email, direct message, or call any of the individuals listed in her answer to Interrogatory 1. Additionally, Jefferson's Answers include references to her telephone conversation with Ms. Brathwaite, a conversation with the office manager on duty that day, and a possible conversation with Steven Brigham, all on the day of the procedure. Jefferson must identify the documents that evidence these conversations and, if they are not in her possession, indicate their location.

IV. CONCLUSION

WHEREFORE, Plaintiff respectfully requests that this Court (1) GRANT her Motion to Compel discovery, (2) ORDER Defendant Jefferson to produce signed, rules-compliant discovery responses by May 9, 2022, (3) AWARD Plaintiff attorney's fees and costs, and (4) GRANT such other relief as the Court deems appropriate.

Plaintiff requests an expedited ruling on this matter.

Respectfully submitted,

By: /s/ Peter C. Grenier /s/
Peter C. Grenier, #418570
David W. Blum, #1029697
Grenier Law Group PLLC
1920 L Street, N.W., Suite 750
Washington, D.C. 20036
Phone: 202-768-9600
Fax: 202-768-9604
Counsel for Plaintiff

RULE 37 CERTIFICATION

On April 14, 2022, more than ten (10) days prior to filing this motion, Plaintiff’s Counsel notified Defendant Jefferson via letter that her responses were unsigned and thus invalid under Super. Ct. Civ. R. 26(g)(2). The same letter also identified other deficiencies that, had Jefferson signed the responses, would have been deficient under the rules. This letter is attached as Plaintiff’s Exhibit 3. Jefferson has never supplemented her unsigned responses, and thus, Plaintiff is under no obligation to act as though discovery has been responded to. Therefore, under Super. Ct. Civ. 37(C)(i), the requirement of a meeting is waived.

/s/ David W. Blum /s/
David W. Blum, #1029697

RULE 12-I CERTIFICATION

Pursuant to Super. Ct. Civ. R. 12-I(a)(1), I hereby certify that I made a good faith effort to discuss the contents of this motion as detailed herein. Plaintiff was unable to obtain consent to the relief sought in this motion nor narrow the areas of disagreement.

/s/ David W. Blum /s/
David W. Blum, #1029697

CERTIFICATE OF SERVICE

I hereby certify that on April 29, 2022, a copy of this Motion, Exhibits, and Proposed Order was filed and served via CaseFile Xpress upon:

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

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

Thomas V. Monahan, Jr.
Jhanelle Graham Caldwell
Goodell, DeVries, Leech & Dann, LLP
One South Street, 20th Street
Baltimore, Maryland 21202
Counsel for Defendant Moore OBGYN, LLC

/s/ Nancy Grenier /s/
Nancy Grenier

Exhibit 1

**IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

MARKEISHA HEMSLEY)	
)	
Plaintiff,)	
)	
v.)	Case No. 2021 CA 003339 M
)	Judge Robert R. Rigsby
KHALILAH Q. JEFFERSON, et al.)	Next Event: Status Conference
)	September 30, 2022, at 10:30 a.m.
Defendants.)	
)	

CERTIFICATE REGARDING DISCOVERY

I HEREBY CERTIFY that on this 14th day of February, 2022, Plaintiff served a true and correct copy of the following records via Case File Xpress, electronic mail, and/or first class mail, postage prepaid, on Khalilah Q. Jefferson, 13103 Saint James Sanctuary Dr., Bowie, MD 20720; Andrew E. Vernick, Esq. and Christopher J. Greaney, Esq., 111 Annapolis Street, Annapolis, MD 21401, counsel for Defendant United Health Group, LLC, d/b/a Capital Women’s Services; and Thomas V. Monahan, Jr., Esq. and Jhanelle Graham Caldwell, One South Street, 20th Street, Baltimore, MD 21202, counsel for Defendant Moore OBGYN, LLC,

- (1) Plaintiff’s First Set of Interrogatories to Defendant United Health Group, LLC d/b/a Capital Women’s Services
- (2) Plaintiff’s First Set of Interrogatories to Defendant Khalilah Q. Jefferson
- (3) Plaintiff’s First Set of Interrogatories to Defendant Moore OBGYN, LLC
- (4) Plaintiff’s First Requests for Production of Documents to Defendant United Health Group LLC, d/b/a Capital Women’s Services
- (5) Plaintiff’s First Set of Requests for Production of Documents to Defendant Khalilah Q. Jefferson

(6) Plaintiff's First Requests for Production of Documents to Defendant Moore OBGYN,
LLC

I shall retain the originals of these documents in my possession, without alteration, until the case is concluded in this Court, the time for noting an appeal has expired, and any appeal noted has been concluded.

Respectfully submitted,

February 14, 2022

/s/ David W. Blum /s/
Peter C. Grenier (DC Bar # 418570)
David W. Blum (DC Bar # 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

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February, 2022, a copy of the foregoing was served electronically via CaseFile Xpress, electronic mail, and/or first-class mail, postage prepaid, upon:

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

Andrew E. Vernick, Esquire
Christopher J. Greaney, Esq.
Vernick and Associates, LLC
111 Annapolis Street
Annapolis, Maryland 21401
avernick@vernicklegal.com
cgreaney@vernicklegal.com
Counsel for Defendant United Health Group, LLC, d/b/a Capital Women's Services

Thomas V. Monahan, Jr.
Jhanelle Graham Caldwell
Goodell, DeVries, Leech & Dann, LLP
One South Street, 20th Street
Baltimore, Maryland 21202
tvm@gdldlaw.com
jcaldwell@gdldlaw.com
Counsel for Defendant Moore OBGYN, LLC

/s/ Nancy Grenier /s/
Nancy Grenier

Exhibit 2

From: [David Blum](#)
To: [Khalilah Jefferson](#)
Cc: [Peter Grenier](#); [Nancy Grenier](#); [Stephanie Learock](#)
Subject: RE: Interrogatories
Date: Monday, March 14, 2022 3:21:33 PM
Attachments: [image001.png](#)

Ms. Jefferson,

That is fine. We will expect your responses by April 4, 2022. Thank you.

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: Khalilah Jefferson <khablessed@gmail.com>
Sent: Monday, March 14, 2022 10:04 AM
To: David Blum <dblum@grenierlawgroup.com>
Subject: Re: Interrogatories

Good Morning Mr. Blum,

I am reaching out to request an extension to the plaintiff's request for interrogatories. I did not receive the original request by mail and you forwarded it to me 2/25/22 by email, therefore I am requesting an extension to 4/4/2022. There are several documents that I am waiting to receive from United Health Group in order to answer the interrogatories that I have yet to receive.

Thank You,

Khalilah Jefferson

On Feb 25, 2022, at 6:46 PM, Khalilah Jefferson <khablessed@gmail.com> wrote:

Sent from my iPhone

Begin forwarded message:

From: David Blum <dblum@grenierlawgroup.com>
Date: February 25, 2022 at 4:16:45 PM EST
To: Khalilah Jefferson <Khablessed@gmail.com>
Cc: Peter Grenier <pgrenier@grenierlawgroup.com>, Stephanie Leacock <sleacock@grenierlawgroup.com>, Nancy Grenier <ngrenier@grenierlawgroup.com>, Genevieve Grenier <ggrenier@grenierlawgroup.com>
Subject: RE: Interrogatories

Ms. Jefferson,

Thank you for your email. I have attached Plaintiff's Interrogatories and Requests for Production to this email for your convenience. Responses are due March 14, 2022 from all parties.

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

-----Original Message-----

From: Khalilah Jefferson <khablessed@gmail.com>
Sent: Friday, February 25, 2022 3:57 PM
To: David Blum <dblum@grenierlawgroup.com>
Subject: Interrogatories

Good Afternoon,

Please accept this email and formal request that all documents regarding case 2021CA00339M (Hemsley Matter) be served upon defendant Khalilah Jefferson through CaseFile Xpress and not home address moving forward. Please serve interrogatories filed 2/14/22 through case file xpress as they have not been received via USPS to date. Thank you.

Respectfully,
Khalilah Jefferson

Exhibit 4

From: [David Blum](#)
To: [Khalilah Jefferson](#)
Cc: [Stephanie Leacock](#); [Peter Grenier](#); [Genevieve Grenier](#); [Alyssa Barton](#)
Subject: RE: Hemsley v. Jefferson, et al. - Discovery
Date: Friday, April 22, 2022 9:20:46 AM
Attachments: [image001.png](#)

Good morning, Ms. Jefferson.

We did not receive any supplemental discovery from you yesterday. Please advise whether you have time today, 4/22/2022, or next week for a phone call to discuss the outstanding discovery. If we do not hear from you by noon on April 27, 2022, we will move forward with filing a Motion to Compel.

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: David Blum
Sent: Thursday, April 14, 2022 6:07 PM
To: Khalilah Jefferson <khablessed@gmail.com>
Cc: [Stephanie Leacock](mailto:sleacock@grenierlawgroup.com); [Peter C. Grenier](mailto:pgrenier@grenierlawgroup.com) (pgrenier@grenierlawgroup.com) <pgrenier@grenierlawgroup.com>; [Genevieve Grenier](mailto:ggrenier@grenierlawgroup.com) <ggrenier@grenierlawgroup.com>; [Alyssa Barton](mailto:paralegal4@grenierlawgroup.com) <paralegal4@grenierlawgroup.com>
Subject: Hemsley v. Jefferson, et al. - Discovery

Ms. Jefferson,

Please see the attached correspondence from Peter Grenier. A hard copy is in the mail.

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

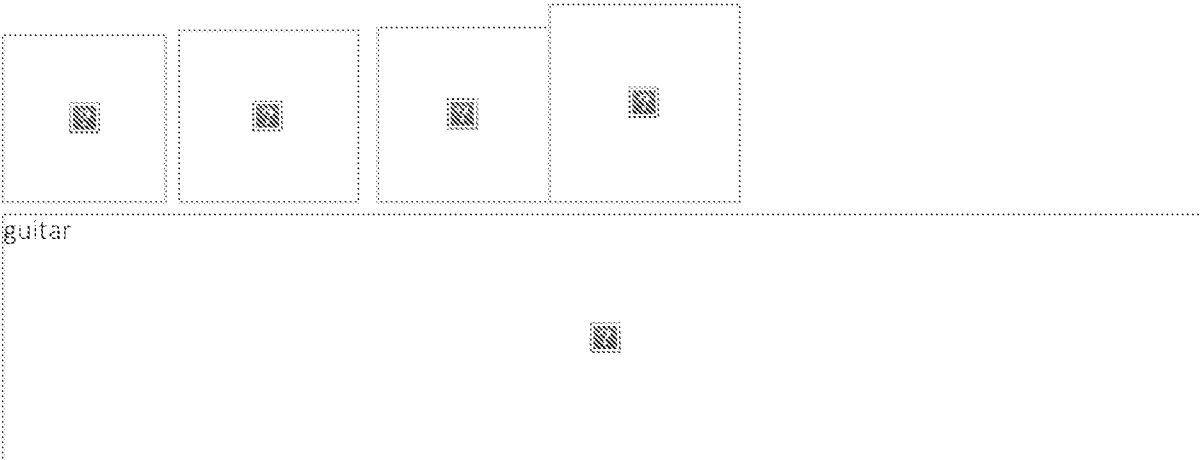


Exhibit 5

From: Peter Grenier
To: Dean Mosley
Cc: David Blum; John Antishin
Subject: RE: Khalil Jefferson
Date: Wednesday, January 26, 2022 1:37:43 PM
Attachments: image002.png
image003.png
image004.png

Dean – we will not be entering into any agreement with Ms. Jefferson. We trust that she will be completely forthcoming with discovery production, and honest in her deposition. No need for any further communication in this regard.

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: Dean Mosley <dfmosleylaw@gmail.com>
Sent: Tuesday, January 25, 2022 8:31 AM
To: Peter Grenier <pgrenier@grenierlawgroup.com>
Subject: Re: Khalil Jefferson

Mr. Grenier, I have spoken to Khalilah Jefferson and she has agreed in the theory of meeting and discussing the matter with you upon agreement to dismiss her from the case. I understand your vicariously liability concern, however I need assurance that she will be dismissed from the matter. I would need a signed document stating that what she says to you will not be used against her and that

she will be dismissed from the case prior to trial and that there will be no attempt to refile against her no matter what the verdict may be at a trial. That document would need to be signed by you and your client prior to any conversation.

Khalilah Jefferson also can lead you to other willing witnesses that will assist in your case.

I will draft a proposed document and get it to you in the next couple of days. Again, I am not a practicing lawyer in Washington DC. I am simply her uncle and I happened to be a lawyer in Florida.

Dean F. Mosley

Dean F. Mosley

On Thu, Jan 20, 2022 at 4:35 PM Peter Grenier <pgrenier@grenierlawgroup.com> wrote:

Hello, Dean. Thanks much for speaking with me earlier today regarding your niece, Ms. Jefferson. It appears that Ms. Jefferson has a lot of information to share, as well as emails and text messages backing up what her testimony would be. If we can reach agreement on our informally questioning her, obtain the documents/ESI from her as described, and get a signed sworn statement from her, I am willing to recommend a dismissal without prejudice to our client, which of course we would obtain prior to going down this road. I understand that Ms. Jefferson no longer works for Capital Women's Care, nor does she work for Moore OB/GYN. Please let me know if and how you wish to proceed, along the foregoing lines. As I explained, we cannot do a formal release, nor can we dismiss "with prejudice," because of concerns that the entity defendant would try to argue that it is a beneficiary of same and/or that it would cut off the vicarious/agency liability. Thanks.

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

