

BEFORE THE HEALTH CARE ALTERNATIVE DISPUTE RESOLUTION OFFICE
OF MARYLAND

[REDACTED] et al

Claimants

v.

HEALTH CARE AND RETIREMENT
CORPORATION OF AMERICA, and
MANOR CARE - ROSSVILLE, MD. LLC

Health Care Provider

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CASE NO.:

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CERTIFICATE OF MERIT

I, the undersigned, [REDACTED], am over the age of eighteen (18), am competent to testify and have personal knowledge of the following:

1. I am a physician licensed to practice in the State of Maryland. I am Board Certified in Internal Medicine with sub-specialty in Geriatrics. I have many years experience caring for geriatric patients in both outpatient and long-term care settings. As a result, I certify that I am actively engaged in clinical practice and consultation related to clinical practice with respect to the care and treatment of nursing home patients and have been within five years of the date of [REDACTED] admission to ManorCare--Rossville. A copy of my Curriculum Vitae is attached.

2. I have reviewed the records of the care provided to [REDACTED] at ManorCare--Rossville. It is my opinion that ManorCare -- Rossville, and its agents, servants and employees complied with the standard of reasonable care and that

[REDACTED] did not sustain injuries as a result of a breach in the standard of care by that ManorCare -- Rossville, its agents, servants or employees.

3. I do not devote more than 20% of my professional activities to activities which directly involve testimony in personal injury claims.


[REDACTED]

[REDACTED]
Pikesville, Maryland 21208

August 26, 2009

[REDACTED]
Baltimore, Maryland 21202

RE: [REDACTED] *Individually and as Personal Representative of the Estate*
of [REDACTED] *v. ManorCare -- Rossville*

Dear Ms. [REDACTED]:

I am a physician licensed to practice in the State of Maryland. I am Board Certified in Internal Medicine with a sub-specialty in Geriatrics. I have many years experience caring for geriatric and physically debilitated patients in both outpatient and long-term care settings. As a result, I certify that I am actively engaged in clinical practice and consultation related to clinical practice with respect to the care and treatment of patients in long term care and have been so within five years of the time of treatment of [REDACTED]. A copy of my Curriculum Vitae is attached. I do not devote more than 20% of my professional activities to activities which directly involve testimony in personal injury claims.

I have reviewed the records of the care provided to [REDACTED] at ManorCare -- Rossville. It is my opinion that ManorCare -- Rossville, and its agents, servants and employees ("ManorCare") complied with the standard of reasonable care and that [REDACTED] did not sustain injuries as a result of a breach in the standard of care by ManorCare, its agents, servants or employees. ManorCare adequately and timely diagnosed and treated [REDACTED] medical conditions including skin excoriation related to her ostomy bag; took reasonable measures to provide for management; took adequate measures to adjust her treatment as needed; adequately and timely assessed, diagnosed, and treated [REDACTED] condition by having her admitted to Franklin Square Hospital; and otherwise provided reasonable and appropriate care. Further, [REDACTED] did not, as alleged by Plaintiff's expert, die as a result of any complications related to her ostomy bag. To a reasonable degree of medical probability [REDACTED] died from urosepsis, thrombosis, and myocardial infarction. All of these issue were unrelated to her ostomy bag and instead were a natural consequence of her underlying illnesses that had caused her to suffer ischemic bowel requiring an ostomy bag. As a result, this case is defensible.

This report is not, nor is it intended to be, an exhaustive description of all my opinions and conclusions and their bases. My opinions may be modified and/or supplemented upon review of additional information and/or documents.