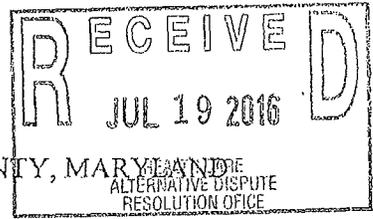


12116



IN THE CIRCUIT COURT FOR HOWARD COUNTY, MARYLAND

	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No
	:	
	:	
	:	
	:	
	:	
	:	
	:	
Defendants.	:	

CERTIFICATE OF QUALIFIED EXPERT

I, \_\_\_\_\_, HEREBY CERTIFY that I have reviewed the nursing home records, medical records and other relevant documents pertaining to the nursing and medical treatment and care rendered to \_\_\_\_\_ by Defendants \_\_\_\_\_ at Ellicott City, \_\_\_\_\_ (hereinafter "Defendants"), its nurses, agents, servants and employees.

I HEREBY CERTIFY that the allegations in Count I are insufficient to establish that Defendants deviated from the applicable standards of care and/or were not the proximate cause of the injuries alleged.

I FURTHER CERTIFY that Defendants exercised due diligence and took appropriate measures in the hiring of \_\_\_\_\_

I FURTHER CERTIFY that based upon \_\_\_\_\_ experience, licensure, education, and training, Defendants could not foresee that \_\_\_\_\_ would act in the manner alleged.

I FURTHER CERTIFY that the allegations against Defendants and \_\_\_\_\_ are inconsistent with, not authorized by, and outside the scope of Defendants policies, procedures, and/or directives.

I FURTHER CERTIFY that as soon as Defendants learned of any alleged departure from the standard of care by \_\_\_\_\_ they immediately took appropriate action under the circumstances.

I FURTHER CERTIFY that I do not devote annually more than 20% of my professional activities to activities that directly involve testimony in personal injury claims.

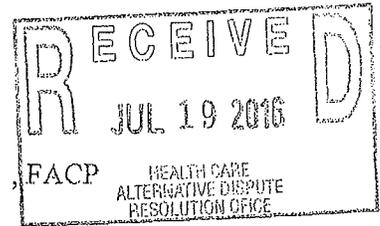
I FURTHER CERTIFY that I have clinical experience, provided consultation relating to clinical practice, or taught medicine in a related field of health care, within 5 years of the date of the alleged act or omission giving rise to the cause of action.

My written report is attached and incorporated herein.

Date. \_\_\_\_\_

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Certificate of Qualified Expert was mailed via first-class mail, postage prepaid, this 19<sup>th</sup> day of July 2016, on:



RE: Medical Report,

Dear

I am Board Certified in Internal Medicine, Geriatric Medicine, and Hospice and Palliative Medicine. I completed a Fellowship in Geriatric Medicine and was formerly the Chief of Geriatrics at Franklin Square Hospital. I have held a number of positions in post-acute and long-term care settings throughout my career. Thus, based upon my education, training and experience, I am qualified to render opinions regarding the care and treatment rendered to Mr.

I have reviewed the available medical records related to the care of \_\_\_\_\_ at the \_\_\_\_\_ as well as excerpts from the facility's personnel file on \_\_\_\_\_ and excerpts of the facility's handbook. I have also reviewed the Plaintiff's Complaint and Plaintiff's Certificate of Qualified Expert and Report.

Based upon my education, experience, training, and review of the available clinical records, it is my opinion to a reasonable degree of medical probability that the care provided to \_\_\_\_\_ as documented in the available medical records complied with applicable standards of care and that no deviation thereof caused his injuries or death. Specifically, based on the medical record at \_\_\_\_\_, it is my opinion that nursing staff properly documented, cared planned, and treated the resident throughout his stay at Respondent's facility.

It is my opinion to a reasonable degree of medical probability that there was proper and sufficient training, including dementia training, of caregivers and healthcare providers by

\_\_\_\_\_, in the care and treatment of patients with dementia, such as \_\_\_\_\_. Moreover, it is my opinion that any alleged abuse of \_\_\_\_\_ in attempting to dress him on the morning of January 16, 2015, January 23, 2015, and February 16, 2015, occurred outside the scope of the proper training and supervision provided by \_\_\_\_\_.

It is my opinion to a reasonable degree of medical probability that there was proper due diligence and appropriate measures taken in the hiring of \_\_\_\_\_. Specifically, measures taken to consider \_\_\_\_\_ experience, licensure, education, and training were appropriate.

For all of the foregoing reasons, I have concluded that this is a defensible case regarding

I reserve the right to formulate additional opinions in this matter, upon review of additional medical records and materials as they become available to me.