

MID-ATLANTIC PERMANENTE MEDICAL GROUP, P.C.)
d/b/a KAISER PERMANENTE)
2101 E. Jefferson St.)
Rockville, MD 20849)
PLEASE SERVE:)
Corporation Service Company, Registered Agent)
100 Shockoe Slip Fl 2)
Richmond, VA 23219;)

BADRIA ALBADER, M.D.)
Sentara Northern Virginia Medical Center)
12825 Minnieville Road)
Lake Ridge, VA 22192-3601;)

DEBRA S. LEE, M.D.)
Sentara Northern Virginia Medical Center)
12825 Minnieville Road)
Lake Ridge, VA 22192-3601;)

ASIFI SHABNAM, PA-C)
Sentara Northern Virginia Medical Center)
12825 Minnieville Road)
Lake Ridge, VA 22192-3601;)

and)

POTOMAC HOSPITAL CORPORATION OF PRINCE WILLIAM)
d/b/a SENTARA NORTHERN VIRGINIA MEDICAL CENTER)
2300 Opitz Boulevard)
Woodbridge, VA 22191)
PLEASE SERVE:)
Samuel J. Hawley, Registered Agent)
6015 Poplar Hall Dr., Suite 308)
Norfolk, VA 23502)

Defendants.)

COMPLAINT WITH DEMAND FOR JURY TRIAL
(Medical Malpractice)

COMES NOW the Plaintiff AYDA ALP, by and through her Counsel, William E. Artz,
P.C., and Frank Sofocleous, Attorney At Law, and files this Complaint seeking judgment against

the Defendants **SHERRY CATHERINE CIPRIANO, D.O., BHAVIN MANUBAI PATEL, M.D., THANH M. DO, D.O., THUAN T. NGUYEN, M.D., KAISER FOUNDATION HEALTH PLAN OF THE MID-ATLANTIC STATES, INC. d/b/a KAISER PERMANENTE, MID-ATLANTIC PERMANENTE MEDICAL GROUP, P.C. d/b/a KAISER PERMANENTE, BADRIA ALBADER, M.D., DEBRA S. LEE, M.D., ASIFI SHABNAM, PA-C, and POTOMAC HOSPITAL CORPORATION OF PRINCE WILLIAM d/b/a SENTARA NORTHERN VIRGINIA MEDICAL CENTER**, jointly and severally, on the grounds and in the amounts hereinafter set forth.

PARTIES

1. At all times pertinent hereto, Plaintiff **AYDA ALP** was an adult resident of the Commonwealth of Virginia, residing at 3404 Soaring Circle, Woodbridge, VA 22193.
2. At all times relevant hereto, Defendant **SHERRY CATHERINE CIPRIANO, D.O.** (hereinafter "DR. CIPRIANO") was, and is, a physician duly licensed to practice medicine in the Commonwealth of Virginia and as such was charged with the duty to practice medicine in accordance with the applicable standard of care, that is, as a reasonably prudent physician practicing in her particular specialty at the time at issue and under the circumstances involved in the treatment at issue. At all times relevant hereto, DR. CIPRIANO had a physician-patient relationship with Plaintiff **AYDA ALP**.
3. At all times relevant hereto, Defendant **BHAVIN MANUBAI PATEL, M.D.** (hereinafter "DR. PATEL") was, and is, a physician duly licensed to practice medicine in the Commonwealth of Virginia and as such was charged with the duty to practice medicine in accordance with the applicable standard of care, that is, as a reasonably prudent physician

practicing in his particular specialty at the time at issue and under the circumstances involved in the treatment at issue. At all times relevant hereto, DR. PATEL had a physician-patient relationship with Plaintiff AYDA ALP.

4. At all times relevant hereto, Defendant **THANH M. DO, D.O.** (hereinafter "DR. DO") was, and is, a physician duly licensed to practice medicine in the Commonwealth of Virginia and as such was charged with the duty to practice medicine in accordance with the applicable standard of care, that is, as a reasonably prudent physician practicing in his particular specialty at the time at issue and under the circumstances involved in the treatment at issue. At all times relevant hereto, DR. DO had a physician-patient relationship with Plaintiff AYDA ALP.

5. At all times relevant hereto, Defendant **THUAN T. NGUYEN, M.D.** (hereinafter "DR. NGUYEN") was, and is, a physician duly licensed to practice medicine in the Commonwealth of Virginia and as such was charged with the duty to practice medicine in accordance with the applicable standard of care, that is, as a reasonably prudent physician practicing in his particular specialty at the time at issue and under the circumstances involved in the treatment at issue. At all times relevant hereto, DR. NGUYEN had a physician-patient relationship with Plaintiff AYDA ALP.

6. Based upon information and belief, at all times relevant hereto, Defendant **KAISER FOUNDATION HEALTH PLAN OF THE MID-ATLANTIC STATES, INC. d/b/a KAISER PERMANENTE** (hereinafter "KAISER") was a foreign corporation organized under the laws of the State of Maryland, doing business in Virginia as a health maintenance organization. Defendant KAISER held itself out to the public generally, and to Plaintiff ALP in particular, as competent and qualified to render medical care, by and through its actual and/or

apparent agents, servants and/or employees, including but not limited to the Defendant DRS. CIPRIANO, PATEL, DO, and NGUYEN. In rendering care and services to Plaintiff ALP, as hereinafter set forth, said agents, servants and/or employees, including but not limited to, Defendant DRS. CIPRIANO, PATEL, DO, and NGUYEN, were acting within the course and scope of their employment and/or agency with Defendant KAISER. Accordingly, Defendant KAISER is liable for the actions/omissions of its agents, servants and employees in providing care and services to Plaintiff ALP, pursuant to the doctrines of *respondent superior* and the principles of agency. At all times relevant hereto, Defendant KAISER had a physician-patient relationship with Plaintiff AYDA ALP through its agents, employees and servants including, but not limited to, Defendants DRS. CIPRIANO, PATEL, DO, and NGUYEN.

7. Based upon information and belief, at all times relevant hereto, Defendant MID-ATLANTIC PERMANENTE MEDICAL GROUP, P.C. *d/b/a* KAISER PERMANENTE (hereinafter "MID-ATLANTIC PERMANENTE") was a foreign corporation organized under the laws of the State of Maryland and doing business in Virginia by employing and contracting out to Defendant, KAISER, physicians and other health care providers. As such, MID-ATLANTIC PERMANENTE held itself out to the public generally, and to Plaintiff ALP in particular, as a health care provider, competent and qualified to render medical care and services, by and through its agents, servants and/or employees, including but not limited to the Defendant DRS. CIPRIANO, PATEL, DO, and NGUYEN. In rendering care and services to Plaintiff ALP, as hereinafter set forth, said agents, servants and/or employees, including but not limited to, Defendant DRS. CIPRIANO, PATEL, DO, and NGUYEN, were acting within the course and scope of their employment and/or agency with Defendant MID-ATLANTIC PERMANENTE.

Accordingly, Defendant MID-ATLANTIC PERMANENTE is liable for the actions/omissions of its agents, servants and employees in providing care and services to Plaintiff ALP, pursuant to the doctrines of *respondent superior* and the principles of agency. At all times relevant hereto, Defendant MID-ATLANTIC PERMANENTE had a physician-patient relationship with Plaintiff AYDA ALP through its agents, employees and servants including, but not limited to, Defendants DRS. CIPRIANO, PATEL, DO, and NGUYEN.

8. At all times relevant hereto, the physicians and/or other health care providers that rendered medical care to the Plaintiff, as hereinafter set forth, were agents of Defendants, KAISER and/or MID-ATLANTIC PERMANENTE, hereinafter collectively referred to as "KAISER", including the Defendant DRS. CIPRIANO, PATEL, DO, and NGUYEN, either through a contractual relationship with, or through the control over them by said Defendants. Further, in rendering medical care to the Plaintiff, as hereinafter set forth, said agents, servants and/or employees were acting within the course and scope of their employment and/or agency with Defendants, KAISER and/or MID-ATLANTIC PERMANENTE, and these principals/employers are, therefore, liable for their actions in connection therewith, pursuant to the doctrines of *respondent superior* and the principles of agency. At all times relevant hereto, the KAISER Defendants had physician-patient relationships with Plaintiff AYDA ALP

9. At all times relevant hereto, Defendant BADRIA ALBADER, M.D. (hereinafter "DR. ALBADER") was, and is, a physician duly licensed to practice medicine in the Commonwealth of Virginia and as such was charged with the duty to practice medicine in accordance with the applicable standard of care, that is, as a reasonably prudent physician practicing in her particular specialty at the time at issue and under the circumstances involved in

the treatment at issue. At all times relevant hereto, DR. ALBADER had a physician-patient relationship with Plaintiff AYDA ALP.

10. At all times relevant hereto, Defendant **DEBRA S. LEE, M.D.** (hereinafter "DR. LEE") was, and is, a physician duly licensed to practice medicine in the Commonwealth of Virginia and as such was charged with the duty to practice medicine in accordance with the applicable standard of care, that is, as a reasonably prudent physician practicing in her particular specialty at the time at issue and under the circumstances involved in the treatment at issue. At all times relevant hereto, DR. LEE had a physician-patient relationship with Plaintiff AYDA ALP.

11. At all times relevant hereto, Defendant **ASIFI SHABNAM, PA-C** (hereinafter "PA-C SHABNAM") was, and is, a physician assistant duly licensed to practice medicine in the Commonwealth of Virginia and as such was charged with the duty to practice medicine in accordance with the applicable standard of care, that is, as a reasonably prudent physician assistant practicing in his/her particular specialty at the time at issue and under the circumstances involved in the treatment at issue. At all times relevant hereto, PA-C SHABNAM had a physician-patient relationship with Plaintiff AYDA ALP.

12. Based upon information and belief, at all times relevant hereto, Defendant **POTOMAC HOSPITAL CORPORATION OF PRINCE WILLIAM d/b/a SENTARA NORTHERN VIRGINIA MEDICAL CENTER** (hereinafter "SENTARA") was a corporation organized under the laws of the Commonwealth of Virginia that held itself out to the public generally, and to Plaintiff ALP in particular, as competent and qualified to render medical care, by and through its agents, servants and/or employees, including but not limited to the Defendants

DR. ALBADER, DR. LEE, and PA-C SHABNAM. In rendering care and services to Plaintiff ALP, as hereinafter set forth, said agents, servants and/or employees, including but not limited to, Defendants DR. ALBADER, DR. LEE, and PA-C SHABNAM, were acting within the course and scope of their employment and/or agency with Defendant SENTARA. Accordingly, Defendant SENTARA is liable for the actions/omissions of its agents, servants and employees in providing care and services to Plaintiff ALP, pursuant to the doctrines of *respondeat superior* and the principles of agency. At all times relevant hereto, Defendant SENTARA had a physician-patient relationship with Plaintiff AYDA ALP through its employees, agents and servants including, but not limited to, DRS. ALBADER, LEE, and PA-C SHABNAM.

FACTUAL STATEMENT

13. AYDA ALP, age 37, presented to KAISER PERMANENTE on 10/22/18 with complaints of headache, cough, and right sided ear pain. Her head pain was reported as a ten (10). She was given an injection of Toradol. She was diagnosed with acute sinusitis and prescribed Augmentin, Prednisone and Benzonatate caps. She was discharged home.

14. Four days later on 10/26/18, MRS. ALP experienced sudden onset right-sided severe headache while sitting at the dinner table with her husband. She was described as passing out, a sign of syncope. She was brought to the KAISER ER where she was noted to be unable to follow verbal commands. She was seen and evaluated by Defendant SHERRY CATHERINE CIPRIANO, M.D. She was sent by ambulance for a stat head CT scan to the SENTARA NORTHERN VIRGINIA MEDICAL CENTER. The CT head scan, without contrast, was reported as no intracranial abnormalities seen. MRS. ALP's Emergency Medicine Provider at SENTARA was ALBADER BADRIA, M.D., who noted that MRS. ALP had a "Nonintractable

headache, unspecified chronicity pattern, unspecified headache type.” The diagnosis was “Migraine HA, Sinusitis, Non-tractable HA.” She presented with worsening radiating frontal headache with associated symptoms of photophobia and nausea. MRS. ALP reported previous presentations of headache but stated that the current headache is “different in intensity which prompted her to go to Kaiser Urgent Care for further evaluation.” Despite MRS. ALP’s complaints, no further imaging was ordered. She was provided medication and was discharged home.

15. On 10/30/18 she presented to KAISER for a follow up appointment and was seen and evaluated by Defendant BHAVIN MANUBAI PATEL, MD., who was aware of MRS. ALP’s prior visit to KAISER on 10/26/18, including her complaints and presentation at that earlier visit. DR. PATEL charted the previous diagnosis of migraine headache and the patient’s report of having a history of migraine headaches and also that “this time was severe.” The chart notes that the reason for the 10/30/18 visit was HEADACHE (new onset or new symptoms), possible UTI and cough. The diagnoses for the 10/30/18 visit included “headache, migraine, nausea and vomiting.” MRS. ALP was administered a Toradol (Ketorolac) injection and once again released to return home.

16. On 11/06/18, MRS. ALP returned to the KAISER ER with complaints of a throbbing headache which was ten/ten (10/10). She reported photophobia, nausea and reported vomiting one time. MRS. ALP was seen and evaluated by Defendant THANH M. DO, D.O. She was given an injection of Toradol, diagnosed with migraine and sinusitis and again discharged home.

17. MRS. ALP returned to KAISER on 11/09/18 and was seen and evaluated by

Defendant THUAN T. NGUYEN, M.D. She complained of headache for approximately two weeks, right sided eye and side of head. She complained of vomiting and some cough. DR. NGUYEN thought that her history and physical examination were consistent with migraine. A CT scan was obtained on 11/09/18 without contrast which was reported to show "No acute abnormality." She was administered multiple medications, including Dilaudid, Zofran, Imitrex, Decadron, Phenergan, Toradol, Zofran and IV fluids. MRS. ALP was again discharged home.

18. While on her way home from KAISER, MRS. ALP began crying and screaming due to severe head pain. Her husband called KAISER and was told to take her to the Emergency Department. Her husband drove her to SENTARA NORTHERN VIRGINIA MEDICAL CENTER. She was reported as tearful and reported nausea, vomiting and double vision upon arrival. She was described as moaning and vomiting. She was given Toradol, Benadryl, Reglan and fluids. MRS. ALP was assigned SHABNAM ASIFI, PA as her Emergency Medicine Provider and PA ASIFI assessed MRS. ALP. The assessment was "no indication for labs or imaging. Will order IVF, toradol, Benadryl, zofran then re-assess." PA ASIFI reported "no significant concern based on presentation or clinical course to warrant further testing." DEBRA S. LEE, M.D. reviewed the "notes, assessments, and/or procedures performed by NP/PA" and charted that she concurred "with her/his documentation of Ayda Alp with any additions/ changes documented below." MRS. ALP was again discharged home with no imaging or further diagnostic studies.

19. Three days later on 11/12/18, her husband found MRS. ALP unresponsive, foaming at the mouth and demonstrating right-sided weakness. She was transported by ambulance to SENTARA NORTHERN VIRGINIA MEDICAL CENTER. She was vomiting

blood and had showed blood in her stool. Upon arrival at the ER, her right pupil was fixed and dilated. A CT head scan was obtained and showed significant right subdural bleeding along the right cerebral hemisphere. There was a 4-5 mm right to left midline shift with brain edema and herniation. Subdural hemorrhage was also seen along the right tentorium and interhemispheric falx. MRS. ALP was taken to the Operating Room by a neurosurgeon for a craniectomy and decompressive craniotomy. Following surgery she was admitted to the ICU.

20. MRS. ALP complained of persistent headache. She was started on Fentanyl infusion and restarted on prednisone. She was transferred to KAISER Rehab at Virginia Hospital Center on or about 11/29/18. At the time of admission, her overall cognitive status was impaired; she had decreased short term memory, decreased awareness of need for safety and decreased awareness of deficits.

21. Due to her persistent headache, a CTA of the head was ordered and performed on 12/07/18 which revealed a large bilobed, posterior communicating artery aneurysm on the right side. It was thought that with MRS. ALP's presentation and history, and considering the anatomy and size of the aneurysm, this likely represented a ruptured aneurysm that ruptured in the subdural space.

22. On 12/09/18, Dr. Chandela, a neurosurgeon, performed a coil embolization of the ruptured right posterior communicating aneurysm. The post operative diagnosis was (1) history of subdural hematoma from a ruptured right posterior communicating artery aneurysm on 11/12/18; (2) history of right hemicraniectomy and evacuation of subdural hematoma on 11/12/18; and (3) untreated 17 mm bilobed right posterior communicating artery aneurysm. MRS. ALP was discharged two days later on 12/11/18.

23. MRS. ALP continues to experience deficits in cognitive function, including memory problems, visual impairment, fluid build-up in her brain, inability to drive a motor vehicle, and inability to engage in gainful employment. She is still required to take multiple medications to treat her condition. It is expected that her condition will not improve in the future and is likely permanent due to delay in proper diagnosis and appropriate treatment for her condition as further described in the paragraphs that follow alleging breaches of the standard of care by the health care providers named herein as Defendants.

COUNT I
(As to the Kaiser Defendants)

24. The allegations contained in paragraphs 1 through 23 of the Complaint, including all subparagraphs contained therein, are realleged, as though fully rewritten herein.

25. At all times relevant hereto, Defendants DRS. CIPRIANO, PATEL, DO, and NGUYEN owed a duty to Plaintiff AYDA ALP to exercise that degree of care, skill and diligence exercised by a reasonably prudent physician in the Commonwealth of Virginia practicing in the same, or a related, field of medicine under the same or similar circumstances of this case.

26. At all times relevant to this action, the Defendants DRS. CIPRIANO, PATEL, DO, and NGUYEN were employees and/or agents of KAISER and/or MID-ATLANTIC PERMANENTE and were acting within the course and scope of their employment therewith in their care and treatment of Plaintiff ALP.

27. KAISER and/or MID-ATLANTIC PERMANENTE is/are liable pursuant to the doctrine of *respondet superior* for the negligence and the deviations of the standard of medical care committed by Defendants DRS. CIPRIANO, PATEL, DO, and NGUYEN.

28. At all times relevant hereto, the KAISER and/or MID-ATLANTIC PERMANENTE Defendants breached their duties of care to Plaintiff AYDA ALP, and were therefore negligent as follows:

(a) As the Emergency Department/Urgent Care physicians employed by KAISER and/or MID-ATLANTIC PERMANENTE who saw and evaluated MRS. ALP on 10/26/18, 10/30/18, 11/06/18, and 11/09/18, the KAISER and/or THE MID-ATLANTIC PERMANENTE Defendants breached the standard of care in failing to appreciate the severity of MRS. ALP's condition as exhibited by her symptoms, in failing to order the correct imaging study of her brain, in failing to order appropriate neurosurgical and/or neurointerventional radiological consultations and in discharging her without appropriate, timely, and complete treatment for her condition.

(b) Considering the constellation of complaints and symptoms of the patient, MRS. ALP (including severe headache, syncope, nausea, and vomiting), the standard of care applicable in Virginia required that a CTA (computer-assisted tomography with angiography) be ordered for MRS. ALP which would likely have shown an active bleed of the posterior communicating artery. This finding would, to a reasonable degree of medical certainty and probability, have led to a neurosurgical and/or neurointerventional radiology consult and thereafter treatment in the form of coil embolization or clipping of the affected vessel, thereby substantially increasing the chances of a better outcome than that experienced by MRS. ALP. In failing to order the CTA study, and the appropriate consultations with specialists, the KAISER Defendants were in breach of the applicable standard of care.

(c) It was also a breach of the applicable standard of care on the part of the KAISER Defendants to discharge MRS. ALP without the benefit of the CTA, and the appropriate

consultations with specialists, as MRS. ALP's diagnosis and treatment were incomplete, thereby causing MRS. ALP severe and permanent injury.

(d) Plaintiff reserves the right to allege additional breaches of the standard of care as may be revealed through further investigation and the discovery process in this action.

29. The aforementioned breaches of the standard of care proximately caused injury to Plaintiff ALP for which she seeks an award of just and fair compensation as more fully set forth below under the title "Causation and Damages."

COUNT II
(As to the Sentara Defendants)

30. The allegations contained in paragraphs 1 through 29 of the Complaint, including all subparagraphs contained therein, are realleged, as though fully rewritten herein.

31. At all times relevant hereto, Defendants DR. ALBADER, DR. LEE, and PA-C SHABNAM owed a duty to Plaintiff AYDA ALP to exercise that degree of care, skill and diligence exercised by reasonably prudent physicians/physician assistants in the Commonwealth of Virginia practicing in the same, or a related, field of medicine under the same or similar circumstances of this case.

32. At all times relevant hereto, Defendants DR. ALBADER, DR. LEE, AND PA-C SHABNAM, were employees, agents and servants of SENTARA and were acting within the course and scope of their employment therewith when they provided care and treatment to the Plaintiff AYDA ALP.

33. Defendant SENTARA is liable pursuant to the doctrine of *respondeat superior* for the negligence and deviations from the accepted standards of medical care by Defendants DR. ALBADER, DR. LEE, and PA-C SHABNAM.

34. At all times relevant hereto, the SENTARA Defendants breached their duties of care to Plaintiff AYDA ALP, and were therefore negligent as follows:

(a) As the Emergency Department/Urgent Care physicians and a PA-C employed by SENTARA who saw and evaluated MRS. ALP on 11/06/18 and 11/09/18, respectively, the SENTARA Defendants breached the applicable standard of care in failing to appreciate the severity of MRS. ALP's condition as exhibited by her symptoms, in failing to order the correct imaging study of her brain and in failing to obtain appropriate neurosurgical/neurointerventional radiology consultations and in discharging her without providing appropriate and complete treatment to her for her condition.

(b) Considering the constellation of complaints and symptoms of the patient (including severe headache, syncope, nausea, and vomiting), the standard of care applicable in Virginia required that a CTA (computer-assisted tomography with angiography) be ordered for MRS. ALP which would likely have shown an active bleed of the posterior communicating artery. This finding would, to a reasonable degree of medical certainty and probability, have led to a neurosurgical and/or neurointerventional radiology consult and thereafter appropriate treatment in the form of coil embolization or clipping of the affected vessel thereby increasing the chances of a substantially better outcome than that experienced by MRS. ALP. In failing to order the CTA study and appropriate consultations, the SENTARA Defendants were in breach of the standard of care.

(c) It was also a breach of the applicable standard of care on the part of the SENTARA Defendants to discharge MRS. ALP without the benefit of the CTA, and appropriate consultations with specialists, as her diagnosis and treatment were incomplete thereby causing

MRS. ALP injury.

(d) Plaintiff reserves the right to allege additional breaches of the standard of care as may be revealed through further investigation and the discovery process in this action.

35. The aforementioned breaches of the standard of care proximately caused injury to Plaintiff ALP for which she seeks an award of just and fair compensation as more fully set forth below under the title "Causation and Damages."

COUNT III - CAUSATION AND DAMAGES

36. The allegations contained in paragraphs 1-35 of this Complaint, and all subparagraphs contained therein, are realleged as though fully re-written herein.

37. As a direct and proximate result of the Defendants' negligence and breaches of the standard of care, Plaintiff AYDA ALP was deprived of appropriate, complete, and timely care which caused there to be a catastrophic delay in the diagnosis and treatment of her brain condition resulting in physical and mental injury manifesting themselves in many ways.

38. As a further direct and proximate result of the Defendants' negligence, the Plaintiff has incurred, and will continue to incur in the future, substantial medical, surgical, hospital, rehabilitative, vocational, and living expenses associated with the treatment of her severe and permanent physical, mental, and emotional conditions.

39. As a further direct and proximate result of the Defendants' negligence, Plaintiff suffers from fluid buildup in the brain, and multiple severe headaches per month that typically last for several hours. Plaintiff experiences pain with photophobia, nausea and vomiting and a pulsating sensation. MRS. ALP experiences sadness, depression, crying spells, low energy and fatigue (tiredness). She experiences sleep problems in that when she wakes up, she has trouble

falling back to sleep. Plaintiff no longer derives pleasure in performing the normal activities of daily living. Plaintiff takes multiple medications to address her various physical and mental problems.

40. As a further direct and proximate result of the Defendants' negligence, the Plaintiff has sustained a loss of wages, both past and present, as well as in the future and a lessening of her earning capacity.

41. As a further direct and proximate result of the Defendants' negligence, the Plaintiff has suffered, and will continue to suffer in the future, a loss of quality of life, physical and emotional pain and suffering, severe mental and emotional distress and anxiety and inconvenience.

WHEREFORE, the Plaintiff AYDA ALP prays that this Honorable Court enter judgment IN HER FAVOR and against Defendants, SHERRY CATHERINE CIPRIANO, D.O., BHAVIN MANUBAI PATEL, M.D., THANH M. DO, D.O., THUAN T. NGUYEN, M.D., KAISER FOUNDATION HEALTH PLAN OF THE MID-ATLANTIC STATES, INC. *d/b/a* KAISER PERMANENTE, MID-ATLANTIC PERMANENTE MEDICAL GROUP, P.C. *d/b/a* KAISER PERMANENTE, BADRIA ALBADER, M.D., DEBRA S. LEE, M.D., ASIFI SHABNAM, P.A.C, and POTOMAC HOSPITAL CORPORATION OF PRINCE WILLIAM *d/b/a* SENTARA NORTHERN VIRGINIA MEDICAL CENTER, jointly and severally, in the amount of FOUR MILLION DOLLARS (\$4,000,000.00) together with pre-judgment interest from the date of injury, post-judgment interest and the costs of this proceeding and any and ALL other relief to which the Plaintiff AYDA ALP may be entitled according to the laws of the Commonwealth of Virginia.

JURY DEMAND

Plaintiff AYDA ALP hereby requests a TRIAL BY JURY as to all matters and issues triable to a jury according to the laws of the Commonwealth of Virginia.

Respectfully submitted,

AYDA ALP

By Counsel

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