

**ORIGINAL**

FILED  
COURT OF CLAIMS  
OF OHIO

2014 SEP 10 PM 1:38

**IN THE COURT OF CLAIMS  
STATE OF OHIO**

Tina Carroll

Case No. 2014 - 00722

Plaintiff

JUDGE

v.

**AFFIDAVIT OF MERIT: RONICA  
NEUHOFF, MD**

University of Toledo Medical Center,  
et al.

Robert W. Bryce (0006527)  
SCHLAGETER & BRYCE CO., LPA  
715 S. Coy Road  
Oregon, OH 43616  
Telephone: 419-691-2435  
Fax: 419-691-1209  
Email: bryce@sbattylaw.com

Defendants

John R. Kuhl (0014998)  
LAW OFFICE OF JOHN R. KUHL  
3150 Republic Blvd. North  
Suite 1  
Toledo, OH 43615  
Telephone: 419-473-1431  
Email: jrkuhlatty@bex.net

Counsel for Plaintiff

STATE OF OHIO )  
COUNTY OF HAMILTON )

SS:

I, Mickey M. Karram, MD, first being duly sworn under oath do hereby state and  
depose as follows:

1. That I am a physician licensed to practice medicine in the State of Ohio.

That I am board certified by the American Board of Obstetrics and

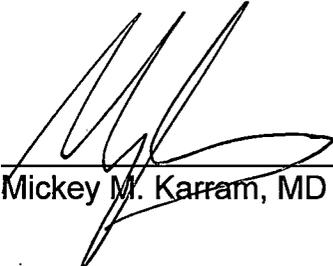
Gynecology; that I am a Clinical Professor of Obstetrics and Gynecology

**ON COMPUTER**

at the University of Cincinnati; that I am a Clinical Professor of Urology at the University of Cincinnati; that I am Director of Urogynecology and Reconstructive Pelvic Surgery at the Christ Hospital, Department of Obstetrics and Gynecology, Cincinnati, Ohio.

2. That I spend more than seventy-five (75) percent of my profession time in the active clinical practice of medicine and/or teaching, specializing in obstetrics, gynecology, and urology.
3. That I have reviewed the medical records of Tina Carroll, including the Operative Reports of the University of Toledo Medical Center dated March 25, 2013, April 9, 2013, April 16, 2013, May 7, 2013, and October 9, 2013; Discharge Summaries of the University of Toledo Medical Center dated May 22, 2013, June 4, 2013, August 23, 2013, and October 14, 2013; Radiology records relevant to the aforementioned admissions to the University of Toledo Medical Center; and other relevant medical records.
4. That I am familiar with the standards of care required to be exercised by gynecologists who render care and treatment to patients with gynecological conditions under circumstances as present in this matter.
5. That it is my opinion to a reasonable degree of medical certainty that Ronica Neuhoff, MD departed from the accepted standards of care applicable to Dr. Neuhoff under the circumstances of this case in her care and treatment of Tina Carroll.

6. That it is my opinion to a reasonable degree of medical certainty that these departures from the accepted standards of care directly and proximately caused Tina Carroll to suffer injury.
7. These are not necessarily all the opinions that I hold in relation to this matter.

  
Mickey M. Karram, MD

Sworn to and subscribed in my presence this 28 day of August,  
2014 by Mickey M. Karram, MD.

  
Notary Public



Laura Bodart  
Notary Public, State of Ohio  
My Commission Expires 10-22-2017

**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing was mailed this 9 day of

September, 2014 to the following:

Jeff Greenley, Esq. (email: jeffgreenley@ohioattorneygeneral.gov)

Attorney General of the State of Ohio

Court of Claims Defense Section

150 East Gay Street, 18<sup>th</sup> Floor

Columbus, OH 43215-3130

*Counsel for Defendants, University of Toledo Medical Center, John Geisler, MD, Samay Jain, MD and Ronica Neuhoff, MD*



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Robert W. Bryce  
Counsel for Plaintiff