

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 standard of care required to be exercised by medical nursing staff and medical surgical staff who render care and treatment to patients with gynecological and urological conditions under circumstances as present in this matter.
5. That it is my opinion to a reasonable degree of medical certainty that the University of Toledo Medical Center, acting by and through its agents and employees, departed from the accepted standards of care applicable to

medical nursing staff and medical surgical staff under the circumstances of this matter in their 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, 18th Floor

Columbus, OH 43215-3130

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



Robert W. Bryce
Counsel for Plaintiff

SCHLAGETER & BRYCE CO., L.P.A.

ROBERT W. BRYCE

715 S. COY ROAD • OREGON, OHIO 43616-3007
419-691-2435 • FAX 419-691-1209 • www.sbattylaw.com

September 9, 2014

Court of Claims of Ohio
The Ohio Judicial Center
65 South Front Street
Third Floor
Columbus, OH 43215

FILED
COURT OF CLAIMS
OF OHIO
2014 SEP 10 PM 1:38

RE: Tina Carroll v. University of Toledo Medical Center
Court of Claims of Ohio Case No. 2014-00722
Our File No. 10/14-010

Dear Madam/Sir:

Enclosed, please find an original and two copies of the following in the above-captioned matter:

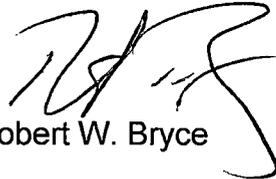
1. Affidavit of Merit: University of Toledo Medical Center;
2. Affidavit of Merit: John Geisler, MD;
3. Affidavit of Merit: Ronica Neuhoff, MD.

Once filed, kindly return a filed stamped copy of each in the enclosed, self-addressed stamped envelope.

Very truly yours,

SCHLAGETER & BRYCE CO., LPA

by


Robert W. Bryce

RWB/sml
Enclosures
cc w/enc:

Jeff Greenley, Esq. (via U.S. Mail & email: jeffgreenley@ohioattorneygeneral.gov)
Attorney General of the State of Ohio
Court of Claims Defense Section