

3-5. Defendant admits the allegations set forth in paragraphs 3, 4 and 5 of the complaint.

First Cause of Action

6. Defendant hereby restates and incorporates herein its answers to paragraphs 1 through 5 of the complaint.

7-8. Defendant admits the allegations set forth in paragraphs 7 and 8 of the complaint.

9-10. Defendant denies the allegations set forth in paragraphs 9 and 10 of the complaint.

11. Defendant admits that it received a "180-day letter" from plaintiff, but states that it was received on March 10, 2013.

Second Cause of Action

12. Defendant hereby restates and incorporates herein its answers to paragraphs 1 through 11 of the complaint.

13-17. Defendant admits the allegations set forth in paragraphs 13, 14, 15, 16, and 17 of the complaint.

18-21. Defendant denies the allegations set forth in paragraphs 18, 19, 20, and 21 of the complaint.

22. Defendant admits that that Dr. Geisler received a "180-day letter" from plaintiff, but states that it was received on March 10, 2013.

Third Cause of Action

23. Defendant hereby restates and incorporates herein its answers to paragraphs 1 through 22 of the complaint.

24-26. Defendant admits the allegations set forth in paragraphs 24, 25 and 26 of the complaint.

27-29. Defendant denies the allegations set forth in paragraphs 27, 28 and 29 of the complaint.

30. Defendant admits that that Dr. Jain received a "180-day letter" from plaintiff, but states that it was received on March 10, 2013.

Fourth Cause of Action

31. Defendant hereby restates and incorporates herein its answers to paragraphs 1 through 30 of the complaint.

32. Defendant admits the allegations set forth in paragraph 32 of the complaint.

33-36. Defendant denies the allegations set forth in paragraphs 33, 34, 35 and 36 of the complaint.

37. Defendant admits that that Dr. Neuhoff received a "180-day letter" from plaintiff, but states that it was received on March 10, 2013.

38. Defendant denies all other allegations set forth in the complaint not specifically admitted herein.

SECOND DEFENSE

39. The complaint fails to state a claim upon which relief may be granted.

THIRD DEFENSE

40. Plaintiff's right to recover damages from the Defendant is limited by the provisions of Ohio Rev. Code § 3345.40.

FOURTH DEFENSE

41. Any damages suffered by Plaintiff and allegedly attributable to the Defendant were the direct and proximate result of intervening and superseding causes.

FIFTH DEFENSE

42. Plaintiff gave her informed consent to the subject medical treatment and therefore accepted the risk of the injuries and damages of which complaint is made.

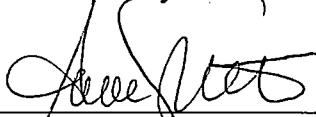
SIXTH DEFENSE

43. Defendant reserves the right to assert any and all affirmative defenses that may become available and/or apparent during discovery, and hereby reserves the right to amend this Answer to assert such defenses.

WHEREFORE, UTMC respectfully requests that the Complaint be dismissed in its entirety at Plaintiff's cost, and that UTMC be entitled to recover its costs expended herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Answer was served by first-class mail, postage prepaid, this 18th day of September, 2014 upon:

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