

ORIGINAL

FILED
COURT OF CLAIMS
OF OHIO

2014 NOV 21 AM 10: 20

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

Tina Carroll

Plaintiff

v.

University of Toledo Medical Center

Defendant

* Case No. 201400722
* JUDGE DALE A. CRAWFORD
* AMENDED
* AFFIDAVIT OF MERIT: UNIVERSITY
* OF TOLEDO MEDICAL CENTER

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* * *

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

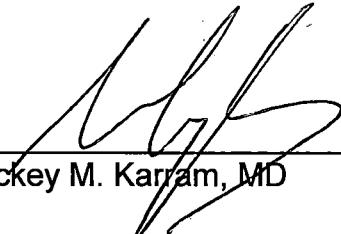
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at the University of Cincinnati; that I am a Clinical Professor of Urology at the University of Cincinnati; that I am Director of Urogynecology and Reconstructive Pelvic Surgery at the Christ Hospital, Department of Obstetrics and Gynecology, Cincinnati,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

March 25, 2013 surgical intervention and 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 19 day of November, 2014 by Mickey M. Karram, MD.



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



Notary Public