

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: RONICA
* NEUHOFF, MD

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* 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

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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 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 during the course of her April 9, 2013 surgical intervention 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 19 day of November, 2014 by Mickey M. Karram, MD.



Notary Public



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