

EXHIBIT A

COPY

**HEATHER ANN TERRY,
Individually, as surviving daughter
and as Personal Representative of the
ESTATE OF LINDA LOUISE
TERRY,
129 Manheim Avenue, Apt. #4
Oaklyn, New Jersey 08107**

Plaintiffs

v.

**JEFFREY JARWRI DORMU, D.O.,
1210 Crittenden St NW
Washington, DC 20011**

AND

**MINIMALLY INVASIVE
VASCULAR CENTER OF
MARYLAND, LLC
9201 Cherry Lane
Laurel, MD 20708**

SERVE ON:

**Resident Agent
Wendy Muhammad
9201 Cherry Lane
Laurel, MD 20708**

Defendants

* IN THE
* CIRCUIT COURT FOR
* PRINCE GEORGE'S
* COUNTY

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Case No.: CA21-10978

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COMPLAINT AND ELECTION FOR JURY TRIAL

Plaintiffs, Heather Ann Terry, Individually, as surviving daughter, and as Personal Representative of the Estate of Linda Louise Terry, by their attorneys, Zev T. Gershon, Randal D. Getz, and Gershon, Willoughby & Getz, LLC, hereby bring this action against Defendants Jeffrey Jarwri Dormu, D.O. and Minimally Invasive Vascular Center of Maryland, LLC and state:

JURISDICTION AND VENUE

1. Damages are in excess of the required jurisdictional amount under Md. Code, Cts. & Jud. Pro. Art § 3-2A-02.

2. Venue is appropriate in Prince George County pursuant to Md. Code, Cts. & Jud. Pro. Art § 6-201, *et. seq.*

3. On August 26, 2021, Plaintiff filed a Statement of Claim against Defendants in the Health Care Alternative Dispute Resolution Office (HCADRO) captioned as *Heather Ann Terry, Individually, as surviving daughter, and as Personal Representative of the Estate of Linda Louise Terry v. Jeffrey Jarwri Dormu, D.O., and Minimally Invasive Vascular Center of Maryland, LLC*, HCADRO No. 2021-359.

4. Plaintiffs then filed with the HCADRO an Election to Waive Arbitration, the Certificate of Merit and Report of Geoffrey L. Risley, M.D., copies of which are attached hereto as Exhibits A and B, respectively. On September 7, 2021, the HCADRO issued an Order of Transfer to the Circuit Court for Prince George County, attached hereto as Exhibit C.

THE PARTIES

5. Linda Louise Terry (hereinafter “Linda Terry” or “Ms. Terry”) died on August 13, 2020 after bleeding to death following elective vascular surgery. She was 62 years old.

6. Ms. Terry’s injuries and death would not have occurred had Defendants Jeffrey Jarwri Dormu, D.O. (“Dr. Dormu”) and the Minimally Invasive Vascular Center of

Maryland, LLC (hereinafter also referred to as "Vascular Center"), through its agents, servants, and/or employees, properly cared for Linda Terry on August 13, 2020.

7. Ms. Terry is survived by her daughter, Plaintiff Heather Terry. Heather Terry was appointed Personal Representative of the Estate of Linda Terry by the Register of Wills for Baltimore County on October 22, 2020. Attached hereto as Exhibit D is a copy of the Letters of Administration.

8. At all times pertinent hereto, Defendant Dr. Dormu held himself out to the public as a competent provider of medical care, including vascular/endovascular surgery, cardiothoracic surgery, and general surgery.

9. At all times pertinent hereto, Defendant Vascular Center held itself out to the public as a competent provider of medical care, including vascular/endovascular surgery, cardiothoracic surgery, and general surgery.

10. At all times pertinent hereto, Defendant Vascular Center provided medical care to Ms. Terry through its servants, employees and agents (actual and/or apparent), each of whom acted within the scope of his or her authority.

11. At all times pertinent, Dr. Dormu acted as servant, employee and/or agent (actual and/or apparent) of Defendant Vascular Center and did so within the scope of his authority.

FACTS RELEVANT TO ALL COUNTS

12. Decedent, Linda Terry, was a resident of Autumn Lake Healthcare at Cherry Lane in Laurel, Maryland. Ms. Terry, age 62, was a paraplegic.

13. Ms. Terry was also diagnosed with peripheral vascular disease and had non-healing heel ulcers.

14. On August 13, 2020, Ms. Terry presented to Defendant Dr. Dormu at Defendant Vascular Center and underwent an elective vascular surgery procedure. The procedure was described as an aortogram with iliac runoff, renogram, arteriogram of lower extremities, and right femoral artery debulking atherectomy.

15. During the procedure, Dr. Dormu reportedly encountered several areas of arterial occlusive disease throughout Ms. Terry's iliac and femoral arteries and Ms. Terry's blood pressure began to drop.

16. Defendant Dr. Dormu then aborted the procedure.

17. Ms. Terry was then sent to the recovery room for hemodynamic monitoring where she continued to bleed internally.

18. Ms. Terry spent approximately 1 hour and 15 minutes in the recovery room. Her blood pressure and heart rate continued to be abnormal.

19. Despite worrisome vital signs, continued evidence of internal bleeding, and other concerns, Dr. Dormu and Vascular Center sent Ms. Terry back to Cherry Lane Nursing Home and not directly to the hospital.

20. Ms. Terry arrived at Cherry Lane Nursing home at approximately 5:20 p.m. in a lethargic state. An ambulance was then called by nursing home staff to transport Ms. Terry to the emergency room.

21. When the ambulance arrived, Ms. Terry was unresponsive. Her respiratory drive began to slow while en route to University of Maryland Laurel Medical Center emergency room.

22. Ms. Terry arrived at the emergency room with a very faint weak carotid pulse. Bruising to her left chest wall and ecchymosis around the vascular surgical site on

her right lower extremity were noted. Her hematocrit and hemoglobin were found to be at critically low levels.

23. Ms. Terry was intubated and attempts were made to resuscitate her.

24. Ms. Terry was pronounced dead at 9:21 p.m. on August 13, 2020 as a result of lactic acidosis, hypotension, and severe anemia from blood loss.

25. Defendants Dr. Dormu and Vascular Center (through its agents, servants and/or employees) should have timely and regularly evaluated Ms. Terry for internal bleeding during and after the vascular surgery.

26. Ms. Terry's internal bleeding was a progressive condition. Had Defendants, Dr. Dormu and Vascular Center (through its agents, servants, and employees), appropriately and timely evaluated Ms. Terry, then her bleeding would have been recognized and treated before she exsanguinated.

27. Defendants Dr. Dormu and Vascular Center (through its agents, servants, and employees), should have transported Ms. Terry directly to the emergency room when she failed to stabilize in the recovery room after the vascular surgery was aborted.

28. Had Defendants Dr. Dormu and Vascular Center (through its agents, servants, and employees), sent Ms. Terry directly to the emergency room, her bleeding would have been recognized earlier and treated before she exsanguinated.

29. Linda Terry did not receive proper care on August 13, 2020, when she was treated by Defendants. Had she been appropriately cared for, Ms. Terry's suffering and death would have been avoided.

30. At all times relevant hereto, Defendants Dr. Dormu and Minimally Invasive Vascular Center of Maryland, LLC (acting through its actual and/or apparent agents,

servants, and employees) owed Linda Terry the duty to exercise that degree of care and skill which like health care providers would have exercised in meeting the applicable standards of care under the same or similar circumstances.

31. Defendant Dr. Dormu departed from the standards of care applicable to like health care providers under the same or similar circumstances and were negligent by its:

- a. failure to properly and adequately treat Linda Terry;
- b. failure to appropriately and timely monitor, recognize, and follow-up on Ms. Terry's signs, and/or symptoms on August 13, 2020;
- c. failure to timely and appropriately recognize and respond to Ms. Terry's condition on August 13, 2020;
- d. failure to perform adequate examinations and evaluations of Ms. Terry so as to appropriately monitor his condition;
- e. failure to have Ms. Terry transported directly to the emergency room when she failed to stabilize in the recovery room after the vascular surgery was aborted; and,
- f. performance of other action or omissions in the care and treatment of Ms. Terry.

32. Defendant Minimally Invasive Vascular Center of Maryland, LLC (acting through its actual and/or apparent agents, servants, and employees) departed from the standards of care applicable to like health care providers under the same or similar circumstances and were negligent by its:

- a. failure to properly and adequately treat Linda Terry;
- b. failure to appropriately and timely monitor, recognize, and follow-

up on Ms. Terry's signs, and/or symptoms on August 13, 2020;

c. failure to timely and appropriately recognize and respond to Ms. Terry's condition on August 13, 2020;

d. failure to perform adequate examinations and evaluations of Ms. Terry so as to appropriately monitor his condition;

e. failure to have Ms. Terry transported directly to the emergency room when she failed to stabilize in the recovery room after the vascular surgery was aborted;

f. failure to adequately train and supervise its agents, servants, and employees; and

g. performance of other action or omissions in the care and treatment of Ms. Terry.

COUNT 1

WRONGFUL DEATH

33. Plaintiff Heather Ann Terry, as surviving daughter of Linda Louise Terry incorporates by reference and realleges paragraphs 1 through 32 as if fully set forth herein.

34. As a direct and proximate result of the negligence of the Defendants, as aforesaid, Linda Terry died, and Heather Terry suffered, and will continue to suffer, great mental anguish, emotional pain and suffering, and the loss of companionship, society, protection, consortium, affection, advice, counsel, education, guidance, love, joy, services, comfort, care and attention of Linda Terry, as well as other damages.

WHEREFORE, Plaintiff Heather Terry, as surviving daughter of Linda Terry, requests that she be compensated with a fair, adequate, and just award of compensatory

damages against Defendants, plus costs.

COUNT II

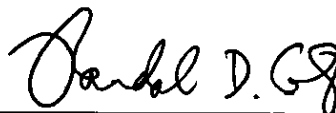
SURVIVAL ACTION

35. Plaintiff Heather Terry, as Personal Representative of the Estate of Linda Terry, incorporates by reference and realleges paragraphs 1 through 34 as if fully set forth herein.

36. As a direct and proximate result of the negligence of the Defendant, Linda Terry suffered severe personal injuries, including, but not limited to, conscious physical pain and mental suffering. Further, the Estate incurred medical, funeral, and burial expenses, along with other expenses.

WHEREFORE, Plaintiff Heather Terry, as Personal Representative of the Estate of Linda Terry, requests that the Estate be compensated with a fair, adequate, and just award of compensatory damages against Defendants, plus costs.

Respectfully submitted,



Zev T. Gershon, M.D., J.D.

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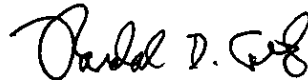
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Attorneys for Plaintiff

ELECTION FOR JURY TRIAL

Plaintiffs hereby elect to exercise her constitutional right to trial by jury.

Respectfully submitted,



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