

VIRGINIA:

IN THE CIRCUIT COURT OF ARLINGTON COUNTY

CHRISTEL D. WADE,  
Personal Representative for the Estate of  
Lauren A. Wade, Deceased,

PLAINTIFF,

v.

KAISER FOUNDATION HEALTH PLAN  
OF THE MID-ATLANTIC STATES, INC.,  
d/b/a KAISER PERMANENTE,

KAISER FOUNDATION HEALTH  
PLAN, INC.

RAJENDRA J. BORKAR, M.D.,

POORNIMA U. PANDELLAPALLI, M.D.,

MID-ATLANTIC PERMANENTE  
MEDICAL GROUP, P.C.

DAVID A. SMITH, M.D.,

JEFFREY KIN, M.D.,

SRIRIMAN SRINIVASAN, M.D.,

PULMONARY AND MEDICAL ASSOCIATES  
OF NORTHERN VIRGINIA, LTD.

JOHN K. KILCULLEN, M.D.,

LAWRENCE M. STEIN, M.D.

DEFENDANTS.

RECEIVED

2013 MAY 24 PM 3: 22

PAUL FERGUSON, CLERK  
ARLINGTON CIRCUIT COURT

CASE NO. 13-1498

COMPLAINT

COMES NOW the Plaintiff, Christel D. Wade, Personal Representative for the  
Estate of Lauren A. Wade, deceased, by counsel, and pursuant to the Rules of the

Supreme Court of Virginia moves for judgment against the Defendants, Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc. d/b/a Kaiser Permanente, Kaiser Foundation Health Plan, Inc., Mid-Atlantic Permanente Medical Group, P.C. (the Kaiser entities are hereafter collectively referred to as Defendants Kaiser Permanente), Rajendra J. Borkar, M.D., Poornima U. Pandellapalli, M.D., David A. Smith, M.D., Jeffrey Kin, M.D., Sririman Srinivasan, M.D., Pulmonary and Medical Associates of Northern Virginia, LTD., John K. Kilcullen, M.D., and Lawrence M. Stein, M.D., on the grounds and in the amount as set forth below.

1. Jurisdiction in this Court is based upon Code of Virginia §17.1-513, as amended.

2. Lauren A. Wade was born on July 9, 1991, and died on June 9, 2011, at Virginia Hospital Center in Arlington County, Virginia. Christel D. Wade was the natural mother of Lauren A. Wade.

3. Lauren A. Wade's beneficiaries are: Ronald A. Wade, her father; Christel D. Wade, her mother; and Jeremiah A. Wade, her brother.

4. On April 9, 2013, Christel D. Wade qualified as personal representative (administrator), under Code of Virginia §8.01-50, for the estate of Lauren A. Wade, in Arlington County, Virginia.

5. Defendant Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc. d/b/a Kaiser Permanente is a foreign Maryland corporation doing business in the Commonwealth of Virginia, and at all relevant times hereto, its employees and agents provided medical care and treatment to patients in the Commonwealth of Virginia, including the decedent, Lauren A. Wade.

6. Defendant Kaiser Foundation Health Plan, Inc. is a foreign California corporation doing business in the Commonwealth of Virginia, and at all relevant times hereto, its employees and agents provided medical care and treatment to patients in the Commonwealth of Virginia, including the decedent, Lauren A. Wade.

7. Defendant Mid-Atlantic Permanent Medical Group, P.C., is a Maryland corporation doing business in the Commonwealth of Virginia, and at all relevant times hereto, its employees and agents provided medical care and treatments to patients in the Commonwealth of Virginia, including the deceased Lauren A. Wade.

8. Defendant Rajendra J. Borkar, M.D., an internist, was at all relevant times hereto an employee/ agent of Defendants Kaiser Permanente, and in treating for Lauren A. Wade as outlined herein, was performing his employer's business and acting in the scope of his employment/ agency.

9. Defendant Poornima U. Pandellapalli, M.D., a hematologist, was at all relevant times hereto an employee/ agent of Defendants Kaiser Permanente, and in treating for Lauren A. Wade as outlined herein, was performing her employer's business and acting in the scope of her employment/ agency.

10. Defendant David A. Smith, M.D., a family practitioner, was at all relevant times hereto an employee/ agent of Defendants Kaiser Permanente, and in treating for Lauren A. Wade as outlined herein, was performing his employer's business and acting in the scope of his employment/ agency.

11. Defendant Jeffrey Kin, M.D., a family practitioner, at all relevant times hereto was an employee/ agent of Defendants Kaiser Permanente, and in treating for

Lauren A. Wade as outlined herein, was performing his employer's business and acting in the scope of his employment/ agency.

12. Defendant Sririman Srinivasan, M.D., an internist, was at all relevant times hereto an employee/ agent of Defendants Kaiser Permanente, and in treating for Lauren A. Wade as outlined herein, was performing his employer's business and acting in the scope of his employment/ agency.

13. Defendant Pulmonary and Medical Associates of Northern Virginia, LTD., hereinafter referred to as Pulmonary and Medical Associates, is a Virginia corporation doing business in the Commonwealth of Virginia, and at all relevant times hereto, its employees and agents provided medical care and treatments to patients in the Commonwealth of Virginia, including the deceased Lauren A. Wade.

14. Defendant John K. Kilcullen and Defendant Lawrence M. Stein, M.D., pulmonologists, were at all relevant times hereto an employee/ agent of Defendant Pulmonary and Medical Associates, and in treating for Lauren A. Wade as outlined herein, was performing their employer's business and acting in the scope of his employment/ agency.

15. At all relevant times herein, Lauren A. Wade suffered from sickle cell disease.

16. Since approximately 1997, Lauren A. Wade's primary medical care provider has been Kaiser Permanente.

17. At all relevant times, no agent/ employee of Kaiser Permanente ever administered, nor ordered, hydroxyurea for Lauren A. Wade.

18. Hydroxyurea is medication that is administered to reduce the risk of recurrent acute chest syndrome and sickle cell pain crisis.

19. On May 23, 2011, Lauren A. Wade suffered from a sickle cell pain crisis and received treatment at Kaiser Permanente.

20. On May 23, 2011, Lauren A. Wade received treatment for her sickle cell pain crisis with pain medications and IV fluids.

21. On May 23, 2011, Defendants Kaiser Permanente neither requested nor obtained a hematology consultation concerning Lauren A. Wade.

22. On May 24, 2011, Lauren A. Wade was seen again at Kaiser Permanente for sickle cell pain crisis.

23. On May 24, 2011, Lauren A. Wade received treatment for her sickle cell pain crisis with pain medications and IV fluids.

24. On May 24, 2011, Defendants Kaiser Permanente neither requested nor obtained a hematology consultation concerning Lauren A. Wade.

25. Defendant David A. Smith, M.D. was one of the medical doctors at Kaiser Permanente who treated Lauren A. Wade through May 24, 2011. Defendant David A. Smith, M.D. treated Lauren A. Wade since approximately 2007.

26. On May 29, 2011, Lauren A. Wade was seen at Kaiser Permanente for sickle cell pain crisis.

27. On May 29, 2011, Lauren A. Wade was treated primarily with IV fluids and pain medications.

28. On May 29, 2011, Defendants Kaiser Permanente made the decision to transfer Lauren A. Wade to Virginia Hospital Center.

29. While at Virginia Hospital Center, Lauren A. Wade was under the care, treatment and monitoring of doctors from Defendants Kaiser Permanente, including Defendant Rajendra J. Borkar, M.D., Defendant Poornima U. Pandellapalli, M.D., Defendant Jeffrey Kin, M.D., and Defendant Sririman Srinivasan, MD., and was their patient.

30. While at Virginia Hospital Center, Lauren A. Wade was under the care, treatment and monitoring of Defendant John K. Kilcullen, M.D., Defendant Lawrence M. Stein, M.D., and employees/ agents of Defendant Pulmonary and Medical Associates of Northern Virginia, LTD., and was their patient.

31. On May 29, 2011, Defendants Kaiser Permanente neither requested nor obtained a hematology consultation concerning Lauren A. Wade.

32. On May 29, 2011, an x-ray was performed on Lauren A. Wade's chest, which showed a right lower lobe infiltrate.

33. At Virginia Hospital Center, Lauren A. Wade was initially treated with IV fluids and pain and other medications.

34. No follow-up chest x-rays were performed on May 30, 2011.

35. On May 30, 2011, Defendants Kaiser Permanente neither requested nor obtained a hematology consultation concerning Lauren A. Wade.

36. On May 31, 2011, at Virginia Hospital Center, Lauren A. Wade was discovered to be in respiratory distress.

37. On May 31, 2011, x-rays were performed on Lauren A. Wade's chest which showed significant bilateral basilar airspace disease.

38. At no time between May 29, 2011 and May 31, 2011, was incentive spirometry ordered for or performed on Lauren A. Wade.

39. On June 1, 2011, Lauren A. Wade underwent a fiberoptic bronchoscopy.

40. From May 23 through June 2, 2011, no hematology consultations were obtained nor requested for Lauren A. Wade.

41. From May 23 through June 2, 2011, no Defendant ordered an exchange transfusion with erythrocytapheresis for Lauren A. Wade.

42. On June 3, 2011, a hematology consultation was obtained for Lauren A. Wade with Defendant Poornima U. Pandellapalli, M.D., a hematologist with Kaiser Permanente.

43. Defendant Poornima U. Pandellapalli, M.D. ordered blood transfusions for Lauren A. Wade on June 3, 2011 and June 7, 2011, but did not order an exchange transfusion with erythrocytapheresis.

44. From June 3, 2011 through June 7, 2011, Lauren A. Wade never received an exchange transfusion with erythrocytapheresis.

45. On June 9, 2011, Lauren A. Wade died at Virginia Hospital Center.

**NEGLIGENCE OF DEFENDANTS KAISER PERMANENTE**

46. The allegations contained previously are hereby incorporated as if set forth fully herein.

47. The Defendants Kaiser Permanente had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill,

diligence and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

48. Notwithstanding the duties previously mentioned, the Defendants Kaiser Permanente, recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that its employees/ agents:

- A) failed to timely and properly treat and monitor her medical condition;
- B) failed to timely prescribe and properly administer hydroxyurea;
- C) failed to timely order appropriate incentive spirometry;
- D) failed to timely obtain a hematology consultation;
- E) failed to timely and properly perform an exchange transfusion with erythrocytapheresis; and
- F) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

49. As a direct proximate result of said negligence, Lauren A. Wade died.

50. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and reasonably expected loss of income and services, protection, care and assistance provided by Lauren A. Wade, and any and all other damages recoverable under Virginia law.

51. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.



**NEGLIGENCE OF DEFENDANT RAJENDRA J. BORKAR, M.D.**

52. The allegations contained previously are hereby incorporated as if set forth fully herein.

53. The Defendant Rajendra J. Borkar, M.D. had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill, diligence, and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

54. Notwithstanding the duties previously mentioned, Defendant Rajendra J. Borkar, M.D., recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that he:

- A) failed to timely and properly treat and monitor her medical condition;
- B) failed to timely order appropriate incentive spirometry;
- C) failed to timely obtain a hematology consultation;
- D) failed to timely and properly perform, or order, an exchange transfusion with erythrocytapheresis; and,
- E) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

55. As a direct proximate result of said negligence, Lauren A. Wade died.

56. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and

reasonably expected loss of income and services, protection, care and assistance provided by Lauren A. Wade, and any and all other damages recoverable under Virginia law.

57. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.

**NEGLIGENCE OF DEFENDANT POORNIMA U. PANDELLAPALLI M.D.**

58. The allegations contained previously are hereby incorporated as if set forth fully herein.

59. The Defendant Poornima U. Pandellapalli, M.D. had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill, diligence, and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

60. Notwithstanding the duties previously mentioned, Defendant Poornima U. Pandellapalli, M.D., recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that she:

- A) failed to timely and properly treat and monitor her medical condition;
- B) failed to timely and properly perform, or order, an exchange transfusion with erythrocytapheresis; and
- C) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

61. As a direct proximate result of said negligence, Lauren A. Wade died.

62. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and reasonably expected loss of income and services, protection, care and assistance provided by Lauren A. Wade, and any and all other damages recoverable under Virginia law.

63. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.

**NEGLIGENCE OF DEFENDANT DAVID A. SMITH, M.D.**

64. The allegations contained previously are hereby incorporated as if set forth fully herein.

65. The Defendant David A. Smith, M.D. had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill, diligence and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

66. Notwithstanding the duties previously mentioned, Defendant David A. Smith, M.D., recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that he:

- A) failed to timely and properly treat and monitor her medical condition;
- B) failed to timely prescribe and properly administer hydroxyurea;
- C) failed to timely obtain a hematology consultation;

D) failed to timely and properly perform, or order, an exchange transfusion with erythrocytapheresis; and,

E) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

67. As a direct proximate result of said negligence, Lauren A. Wade died.

68. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and reasonably expected loss of income and services, protection, care and assistance provided by Lauren A. Wade, and any and all other damages recoverable under Virginia law.

69. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.

**NEGLIGENCE OF DEFENDANT JEFFREY KIN, M.D**

70. The allegations contained previously are hereby incorporated as if set forth fully herein.

71. The Defendant Jeffrey Kin, M.D. had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill, diligence and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

72. Notwithstanding the duties previously mentioned, Defendant Jeffrey Kin, M.D., recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that he:

- A) failed to timely and properly treat and monitor her medical condition;
- B) failed to timely obtain a hematology consultation;
- C) failed to timely and properly perform an exchange transfusion with erythrocytapheresis; and,
- D) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

73. As a direct proximate result of said negligence, Lauren A. Wade died.

74. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and reasonably expected loss of income and services, protection, care and assistance provided by Lauren A. Wade, and any and all other damages recoverable under Virginia law.

75. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.

**NEGLIGENCE OF DEFENDANT SRIRIMAN SRINIVASAN, M.D.**

76. The allegations contained previously are hereby incorporated as if set forth fully herein.

77. The Defendant Sririman Srinivasan, M.D. had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to

reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill, diligence and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

78. Notwithstanding the duties previously mentioned, Defendant Sririman Srinivasan, M.D., recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that he:

- A) failed to timely and properly treat and monitor her medical condition;
- B) failed to timely obtain a hematology consultation;
- C) failed to timely and properly perform an exchange transfusion with erythrocytapheresis; and,
- D) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

79. As a direct proximate result of said negligence, Lauren A. Wade died.

80. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and reasonably expected loss of income and services, protection, care and assistance provided by Lauren A. Wade, and any other damages recoverable under Virginia law.

81. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.

**NEGLIGENCE OF DEFENDANT PULMONARY AND MEDICAL ASSOCIATES  
OF NORTHERN VIRGINIA, LTD**

82. The allegations contained previously are hereby incorporated as if set forth fully herein.

83. The Defendant Pulmonary and Medical Associates of Northern Virginia, LTD, had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill, diligence and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

84. Notwithstanding the duties previously mentioned, the Defendant Pulmonary and Medical Associates of Northern Virginia, LTD, recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that its employees/ agents:

- A) failed to timely and properly treat and monitor her medical condition;
- B) failed to timely obtain a hematology consultation;
- C) failed to timely and properly perform, or order, an exchange transfusion with erythrocytapheresis; and,
- D) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

85. As a direct proximate result of said negligence, Lauren A. Wade died.

86. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and reasonably expected loss of income and services, protection, care and assistance

provided by Lauren A. Wade, and any and all other damages recoverable under Virginia law.

87. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.

**NEGLIGENCE OF DEFENDANT JOHN K. KILCULLEN, M.D.**

88. The allegations contained previously are hereby incorporated as if set forth fully herein.

89. The Defendant John K. Kilcullen, M.D. had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill, diligence and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

90. Notwithstanding the duties previously mentioned, Defendant John K. Kilcullen, M.D., recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that he:

A) failed to timely and properly treat and monitor her medical condition;  
B) failed to timely obtain a hematology consultation;  
C) failed to timely and properly perform, or order, an exchange transfusion with erythrocytapheresis; and,

D) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

91. As a direct proximate result of said negligence, Lauren A. Wade died.



92. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and reasonably expected loss of income and services, protection, care and assistance provided by Lauren A. Wade, and any and all other damages recoverable under Virginia law.

93. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.

**NEGLIGENCE OF DEFENDANT LAWRENCE M. STEIN, M.D.**

94. The allegations contained previously are hereby incorporated as if set forth fully herein.

95. The Defendant Lawrence M. Stein, M.D. had a duty to exercise appropriate medical care and caution in the treatment of Lauren A. Wade in order to reasonably protect her health and to avoid injury to Lauren A. Wade, and to use that degree of skill, diligence and standard of care practiced by a reasonably prudent practitioner of medicine in this Commonwealth.

96. Notwithstanding the duties previously mentioned, Defendant Lawrence M. Stein, M.D., recklessly, carelessly and negligently treated Lauren A. Wade, and breached the required standard of care, in that he:

- A) failed to timely and properly treat and monitor her medical condition;
- B) failed to timely obtain a hematology consultation;
- C) failed to timely and properly perform, or order, an exchange transfusion with erythrocytapheresis; and,

D) failed to exercise the degree of skill and diligence practiced by a reasonably prudent practitioner in the field of medicine in this Commonwealth.

97. As a direct proximate result of said negligence, Lauren A. Wade died.

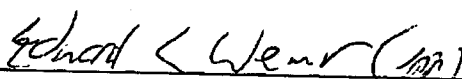
98. As a direct, proximate result of said negligence, the beneficiaries of Lauren A. Wade have suffered sorrow and mental anguish, including loss of society, companionship, comfort, guidance, kindly offices and advice of Lauren A. Wade, and reasonably expected loss of income and services, protection, care and assistance provided by Lauren A. Wade, and any and all other damages recoverable under Virginia law.

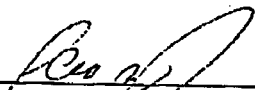
99. As a direct, proximate result of said negligence, Plaintiff Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, has incurred expenses relating to the death and funeral of Lauren A. Wade.

WHEREFORE, the Plaintiff, Christel D. Wade, as Personal Representative for the Estate of Lauren A. Wade, deceased, **DEMANDS A TRIAL BY JURY**, and demands judgment against all of the Defendants, Kaiser Foundation Health Plan of the Mid-Atlantic States, Inc. d/b/a Kaiser Permanente, Defendant Kaiser Foundation Health Plan, Inc., Defendant Mid-Atlantic Permanente Medical Group, P.C., Defendant Rajendra J. Borkar, M.D., Defendant Poornima U. Pandellapalli, M.D., Defendant David A. Smith, M.D., Defendant Jeffrey Kin, Defendant Sririman Srinivasan, Defendant Pulmonary and Medical Associates of Northern Virginia, LTD, and Defendant John K. Kilcullen, M.D., and Defendant Lawrence M. Stein, M.D., jointly and severally, in amount of TEN MILLION DOLLARS (\$10,000,000.00) with pre-judgment interest from June 9, 2011,

plus all other costs expended by the Plaintiff in this action and any such other relief as this Court deems just and proper.

CHRISTEL D. WADE  
Plaintiff  
By Counsel:

  
Edward L. Weiner, Esq., VSB# 19576  
Lawson D. Spivey III, Esq., VSB# 42411  
Eugene C. Miller, Esq., VSB# 24678  
Weiner, Spivey & Miller, PLC  
10605 Judicial Drive, Suite B6  
Fairfax, VA 22030  
Tel: 703-273-9500  
Fax: 703-273-9505  
[EWeiner@WSMinjurylaw.com](mailto:EWeiner@WSMinjurylaw.com)  
[LSpivey@WSMinjurylaw.com](mailto:LSpivey@WSMinjurylaw.com)  
[EMiller@WSMinjurylaw.com](mailto:EMiller@WSMinjurylaw.com)

  
Scott M. Perry, Esq., VSB# 67417  
Mikhael D. Charnoff, Esq., VSB# 43929  
Perry Charnoff, PLLC  
2300 Wilson Blvd., Suite 240  
Arlington, VA 22201  
Tel: 703-291-6650  
Fax: 703-563-6692  
[scott@perrycharnoff.com](mailto:scott@perrycharnoff.com)  
[mike@perrycharnoff.com](mailto:mike@perrycharnoff.com)