

IN THE STATE COURT OF GWINNETT COUNTY  
STATE OF GEORGIA

NICOLE D. HILL,

Plaintiff,

vs.

QUINCY JEROME JORDAN, M.D.;  
BRUNO DENIS, M.D.; JORDEN  
LEMONS, L.P.N.; THE HOSPITAL  
AUTHORITY OF PEACH COUNTY  
d/b/a PEACH REGIONAL MEDICAL  
CENTER; CENTRAL GEORGIA  
HEALTH SYSTEMS, INC.; THE  
MEDICAL CENTER OF CENTRAL  
GEORGIA, INC.; THE MEDICAL  
CENTER OF CENTRAL GEORGIA,  
INC. d/b/a PEACH REGIONAL  
MEDICAL CENTER, PEACH  
EMERGENCY PHYSICIANS, LLC;  
JOSE GUMARIN, M.D.; CHRISTINA  
KOPSICK, L.P.N./R.N.; EMCARE,  
INC.; EMCARE PHYSICIAN  
PROVIDERS, INC.; EMCARE  
PHYSICIAN SERVICES, INC.;  
GEORGIA EM-I MEDICAL  
SERVICES, P.C.; GEORGIA EM-II,  
INC.; and HOUSTON HEALTHCARE  
SYSTEM, INC. d/b/a HOUSTON  
MEDICAL CENTER,

Defendants.

CIVIL ACTION NO.

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COMPLAINT

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COMES NOW the Plaintiff, Nicole D. Hill, and files this Complaint against the above-named Defendants, respectfully showing the Court the following:

**PARTIES, VENUE AND JURISDICTION**

1. Plaintiff, Nicole D. Hill, is a resident of Peach County, Georgia, and has been at all times relevant to this action.

2. Defendant Peach Emergency Physicians, LLC (hereinafter referred to as “PEP”) is a corporation established for the purpose of providing Emergency Room physicians to staff the Emergency Departments of one or more hospitals, one of which specifically was Defendant Peach Regional Medical Center. Defendant PEP at all times relevant to this Complaint held out the physicians it provided to staff Emergency Departments and hospitals as skilled and competent physicians for the care and treatment of individuals such as Plaintiff.
3. Defendant Quincy Jerome Jordan, M.D. (hereinafter referred to as “Jordan”) is a physician duly licensed under the laws of the State of Georgia practicing his profession in Peach County, Georgia and holding himself out to the members of the public generally as a skilled and competent physician. Defendant Jordan is subject to the jurisdiction of this Court as a joint tortfeasor by reason of the facts hereinafter set forth.
4. Defendant Bruno Denis, M.D. (hereinafter referred to as “Denis”) is a physician duly licensed under the laws of the State of Georgia practicing his profession in Peach County, Georgia and holding himself out to the members of the public generally as a skilled and competent physician. Defendant Bruno is subject to the jurisdiction of this Court as a joint tortfeasor by reason of the facts hereinafter set forth.
5. At all times mentioned herein, Defendants Jordan and Denis were employees, agents or servants of Defendant PEP and were acting within the course and scope of their employment with said Defendant. Any negligence of Defendants Jordan and Denis is imputable to Defendant PEP under *respondeat superior*, vicarious liability and the laws of agency.

6. Defendant The Hospital Authority of Peach County d/b/a Peach Regional Medical Center (hereinafter referred to as “Hospital Authority”) is organized under the laws of the State of Georgia for the purpose of operating hospital facilities in Peach County, Georgia. Defendant Hospital Authority is subject to the jurisdiction of this Court as a joint tortfeasor by reason of the facts hereinafter set forth.
7. Defendant The Medical Center of Central Georgia, Inc., individually and d/b/a Peach Regional Medical Center (hereinafter referred to as Peach Regional Medical Center), is a non-profit corporation organized and existing under the laws of the State of Georgia, with an office and principal place of business in Macon, Bibb County, Georgia, and said corporation possessed complete authority to operate and manage the day to day operation of Peach Regional Medical Center at all times relevant to the allegations in this Complaint, under a partnership arrangement and/or contractual arrangement with Defendant Hospital Authority. Defendant The Medical Center of Central Georgia, Inc. is subject to the jurisdiction of this Court by reason of the facts hereinafter set forth.
8. Defendant Central Georgia Health Systems, Inc. (hereinafter referred to as “CGHS”) is a non-profit corporation organized and existing under the laws of the State of Georgia for the purpose of coordinating the relationships of Defendant The Medical Center of Central Georgia, Inc. with other healthcare entities, including hospitals and hospital authorities.
9. In May 2011, Defendants Peach Regional Medical Center, CGHS and The Medical Center of Central Georgia, Inc. created a partnership to enhance healthcare services in Peach County whereby Defendant Peach Regional Medical Center became an affiliate of Defendants CGHS and The Medical Center of Central Georgia, Inc. At all times relevant to this Complaint, these Defendants operated Peach Regional Medical Center as joint

venturers and in an agency relationship. Said joint venture and agency relationship is referred to throughout the remainder of this Complaint as “Peach Regional Medical Center.”

10. Defendant Peach Regional Medical Center held out to the public its Emergency Department as competent and knowledgeable to handle and treat medical emergencies such as that presented by Nicole Hill on June 21, 2011.

11. Defendant Jordan Michael Lemons, L.P.N. (hereinafter “Lemons”) is a resident of Cobb County, Georgia, and at all times relevant to this Complaint was a Licensed Practical Nurse duly licensed under the laws of the State of Georgia, practicing his profession in Peach County, Georgia and holding himself out to the members of the public generally as a skilled and competent nurse.

12. Defendant Peach Regional Medical Center, at all times relevant to this Complaint, was the employer of the nurses and nursing staff of its Emergency Department. Specifically, Defendant Lemons at all times pertinent to this Complaint was the agent, servant, and employee of Defendant Peach Regional Medical Center and was acting within the scope and course of said employment at the time that he was caring for Nicole D. Hill. Defendants Hospital Authority, CGHS and The Medical Center of Central Georgia, Inc. are liable individually and as joint venturers for the grossly negligent acts and omissions of Defendant Lemons under the doctrines of *respondeat superior*, vicarious liability, and the laws of agency of the State of Georgia.

13. At all times mentioned herein, EmCare, Inc. was a Delaware corporation authorized to do business in the State of Georgia and is deemed to reside in Gwinnett County because it maintains its registered office and agent in Gwinnett County. Pursuant to the allegations

herein and O.C.G.A. § 14-2-510(b)(1), said Defendant is subject to the venue and jurisdiction of this Court.

14. EmCare Physician Providers, Inc. is a Missouri corporation authorized to do business in the State of Georgia and is deemed to reside in Gwinnett County because it maintains its registered office and agent there. Pursuant to the allegations herein and O.C.G.A. § 14-2-510(b)(1), said Defendant is subject to the venue and jurisdiction of this Court.

15. EmCare Physician Services, Inc. is a Delaware corporation authorized to do business in the State of Georgia and is deemed to reside in Gwinnett County because it maintains its registered office and agent there. Pursuant to the allegations herein and O.C.G.A. § 14-2-510(b)(1), said Defendant is subject to the venue and jurisdiction of this Court.

16. Georgia EM-I Medical Services, P.C. is a Georgia corporation, a citizen of the State of Georgia, and is deemed to reside in Gwinnett County because it maintains its registered office and agent there. Pursuant to the allegations herein and O.C.G.A. § 14-2-510(b)(1), said Defendant is subject to the venue and jurisdiction of this Court.

17. Georgia EM-II, Inc. is a Georgia corporation, a citizen of the State of Georgia, and is deemed to reside in Gwinnett County because it maintains its registered office and agent there. Pursuant to the allegations herein and O.C.G.A. § 14-2-510(b)(1), said Defendant is subject to the venue and jurisdiction of this Court.

18. Defendant Jose Gumarin, M.D. (hereinafter referred to as “Gumarin”) is a physician duly licensed under the laws of the State of Georgia practicing his profession in Houston County, Georgia and holding himself out to the members of the public generally as a skilled and competent physician. Defendant Gumarin is subject to the jurisdiction of this Court as a joint tortfeasor by reason of the facts hereinafter set forth.

19. At all times relevant herein, Defendant Gumarin was an employee, agent or servant of Defendants EmCare, Inc., EmCare Physician Providers, Inc., EmCare Physician Services, Inc., Georgia EM-I Medical Services, P.C., and/or Georgia EM-II, Inc., and Defendant Gumarin was acting within the course and scope of his employment with said Defendants. Any negligence of Defendant Gumarin is imputable to these Defendants under *respondeat superior*, vicarious liability and the laws of agency.
20. Defendant Houston HealthCare System, Inc., d/b/a Houston Medical Center (hereinafter referred to as "HMC") is a Hospital created under the laws of the State of Georgia, with its principal office and place of business located at 1601 Watson Boulevard, Warner Robins, Houston County, Georgia. Said Defendant is subject to the jurisdiction and venue of this Court. Defendant Hospital held out to the public its Emergency Department and nursing staff as competent and knowledgeable to provide nursing care and treatment to patients who presented for care and treatment like Nicole D. Hill.
21. Defendant Christina R. Kopsick, L.P.N./R.N. (hereinafter "Kopsick") is a resident of Houston County, Georgia, and at all times relevant to this Complaint was a Licensed Practical Nurse duly licensed under the laws of the State of Georgia, practicing her profession in Houston County, Georgia, and holding herself out to the members of the public generally as a skilled and competent nurse (It appears that Defendant Kopsick obtained her registered nurse license on June 5, 2012, almost a year after the acts and omissions at issue in this complaint).
22. Defendant HMC, at all times relevant to this Complaint, was the employer of the nurses and nursing staff of its Emergency Department. Specifically, Defendant Kopsick at all times pertinent to this Complaint was the agent, servant, and employee of Defendant

HMC and was acting within the scope and course of said employment at the time that she was caring for Nicole D. Hill. Defendant HMC is liable for the grossly negligent acts and omissions of Defendant Kopsick under the doctrines of *respondeat superior*, vicarious liability, and the laws of agency of the State of Georgia.

23. Pursuant to the facts alleged herein and O.C.G.A. §§ 9-10-31, 9-10-91 and 14-2-510(b)(1), venue and jurisdiction are proper against all Defendants in this Court.

24. At all times relevant hereto, all Defendants were joint tortfeasors and therefore are jointly and severally liable to Plaintiff for the negligent acts and omissions described and alleged herein.

#### **FACTUAL ALLEGATIONS**

25. On June 21, 2011, Plaintiff was transported by ambulance to Defendant Peach Regional Medical Center complaining of leg cramps and vaginal numbness.

26. Plaintiff was admitted to Defendant Peach Regional Medical Center emergency department at 16:24 under the care of Defendant Jordan, who ordered laboratory tests for Plaintiff.

27. Approximately three hours after Plaintiff's admission, she was seen by Defendant Denis, who noted a history of gluteal numbness for two days. Defendant Denis reviewed the pertinent diagnostic tests, vital signs and clinical notes and performed a physical examination of Plaintiff. Defendant Denis determined that immediate medical attention was not indicated. Plaintiff was given an injection of Solu-Medrol by Defendant Lemons and discharged by him with a diagnosis of lumbosacral neuritis NOS and peripheral neuropathy.

28. On June 23, 2011 Plaintiff was again transported by ambulance, this time to Defendant HMC at her request, complaining of leg cramps, vaginal numbness, painful urination and incontinence.
29. Plaintiff arrived at Defendant HMC's emergency department at 17:05 and was greeted at 17:20. At 18:08 she was triaged and complained of right leg cramps, vaginal numbness, painful urination, urinary incontinence, burning with urination and numbness to her right leg/vagina and buttocks. She indicated the pain had progressively worsened after taking increased doses of Prednisone as instructed on previous visits to Defendants HMC and PRMC's emergency departments.
30. At 20:00, Plaintiff was seen by Defendant Gumarin, at which time he performed a physical examination of Plaintiff and ordered lab work, an in and out urinary catheter, an IV and injections of Solu-Medrol, Dilaudid and Benadryl.
31. At approximately 20:16, an additional nursing assessment was performed by Defendant Kopsick, at which time she diagnosed an alteration in comfort related to Plaintiff's right leg cramps/vaginal/buttock numbness. Defendant Kopsick noted that Plaintiff had a history of sciatica and had been taking Prednisone for the left side, and documented that Plaintiff was now having right buttock and vaginal numbness with pain shooting down her right leg and episodes of incontinence. Defendant Kopsick also noted that Plaintiff rated her pain as 8 of 10 on a pain scale one hour after receiving pain medication.
32. Defendant Gumarin subsequently advised Plaintiff that admission or further emergent workup or intervention was not indicated at that time but that she would need outpatient follow-up and further workup as indicated. At 22:18, Defendant Kopsick discharged Plaintiff from the Emergency Department, after applying a diaper to her, with a diagnosis



of exacerbation of sciatica. At 22:21, Defendant Gumarin noted that Plaintiff would need an MRI as an outpatient.

33. On June 30, 2011, Plaintiff presented to the Perry Hospital Emergency Department complaining of sudden onset four days ago of decreased sensation in the vagina and decreased sensation and needle-like pain, moderate in severity, of her right lateral leg to her lateral toes. She also reported having urine incontinence and no bowel movement for three days. Upon examination by Herbert Frith, M.D., Plaintiff was found to have diminished sensation in the perineum and the right lateral leg, along with very diminished or absent rectal tone and decreased sensation in the perineum. After discussion with a neurologist who agreed that Plaintiff's presentation was consistent with S1, S2, or a possible conus medullaris compression or perhaps cord compression, Plaintiff was transferred to Emory University Hospital Midtown with a diagnosis of cauda equina compression.

34. Plaintiff was admitted to Emory University Hospital Midtown where she underwent an emergency bilateral L5-S1 laminectomy and discectomy with removal of large free fragment disc herniation. Her final diagnosis was acute cauda equina syndrome with L5-S1 acute disc herniation.

#### **CAUSATION AND NEGLIGENCE ALLEGATIONS**

35. Defendants Jordan and Denis were grossly negligent and fell beneath the standard of care for emergency room physicians in the same or similar circumstances in their care and treatment of Nicole D. Hill for the following reasons:

A. On June 21, 2011, Bruno Denis, M.D. and Quincy Jordan, M.D. failed to obtain an appropriate history from Nicole Hill;

- B. On June 21, 2011, Bruno Denis, M.D. and Quincy Jordan, M.D. failed to perform an appropriate physical examination including a perineal examination of Nicole Hill followed by appropriate testing as indicated;
  - C. On June 21, 2011, Bruno Denis, M.D. and Quincy Jordan, M.D. failed to perform an appropriate work-up and order an urgent neurosurgical consultation; and
  - D. On June 21, 2011, Bruno Denis, M.D. and Quincy Jordan, M.D. failed to appropriately diagnose Nicole Hill's burgeoning cauda equina.
36. Defendant Lemons was grossly negligent and fell beneath the standard of care for emergency room nurses in the same or similar circumstances in his care and treatment of Plaintiff by failing to advocate for a more detailed evaluation, consultation and/or admission of Plaintiff.
37. Defendant Gumarin was grossly negligent and fell beneath the standard of care for emergency rooms physicians in the same or similar circumstances in his care and treatment of Nicole D. Hill for the following reasons:
- A. On June 23, 2011, Jose Gumarin, M.D. failed to obtain an appropriate history from Plaintiff;
  - B. On June 23, 2011, Jose Gumarin, M.D. failed to perform an appropriate physical examination of Plaintiff;
  - C. On June 23, 2011, Jose Gumarin, M.D. failed to order an MRI and an urgent neurosurgical consult on Plaintiff's behalf; and
  - D. On June 23, 2011, Jose Gumarin, M.D. failed to appropriately diagnose Plaintiff's burgeoning cauda equina.

38. Defendant Kopsick was grossly negligent and fell beneath the standard of care for emergency room nurses in the same or similar circumstances in her care and treatment of Plaintiff for the following reasons:

- A. On June 23, 2011, Defendant Kopsick failed to advocate for further evaluation, consultation and/or admission of Plaintiff.
- B. On June 23, 2011, Defendant Kopsick failed to inform the emergency department physician that Plaintiff continued to complain of severe pain (8 of 10) an hour after receiving pain medications; and
- C. On June 23, 2011, Defendant Kopsick failed to appreciate the signs and symptoms of a spinal cord injury as evidenced by Plaintiff's complaints of vaginal numbness and urinary incontinence, and Defendant Kopsick discharged Plaintiff with a diaper rather than reporting this information to a registered nurse and/or the emergency department physician.

39. Attached hereto and filed herewith are the Affidavits of Martin E. Lutz, M.D. and Sherri Boyett, R.N., as required by O.C.G.A. § 9-11-9.1. Said affidavits set forth at least one grossly negligent act or omission related to the care and treatment of Plaintiff by each Defendant, which acts and omission caused and contributed to the injuries of Plaintiff.

#### **DAMAGES**

40. As a direct and proximate result of the grossly negligent and substandard treatment by Defendants, Plaintiff, Nicole D. Hill, has suffered severe personal injuries, both mental and physical, and will continue to suffer throughout the duration of her life for which she seeks damages in excess of \$10,000.00.

41. As a direct and proximate result of the grossly negligent and substandard treatment by Defendants, Plaintiff, Nicole D. Hill, has incurred medical and related expenses.

42. As a direct and proximate result of the grossly negligent and substandard treatment by Defendants, Plaintiff, Nicole D. Hill, has incurred loss of earning capacity.

WHEREFORE, Plaintiff respectfully demands:

- A. That summons be issued requiring Defendants to be served as provided by law and requiring the Defendants to answer this Complaint;
- B. That Plaintiff have a trial by a fair and impartial jury of twelve (12) members;
- C. That Plaintiff obtain a judgment individually, jointly and severally against Defendants in excess of \$10,000.00 to compensate her for her damages, both general and special;
- D. That Plaintiff recover the costs of Court; and
- E. That Plaintiff has such other and further relief as this Court shall deem just and equitable.

Respectfully submitted this 3<sup>rd</sup> day of May, 2013.

THE LAW FIRM OF KATHY MCARTHUR  
BY:

  
\_\_\_\_\_  
KATHERINE L. MCARTHUR  
Ga. Bar No. 480730

6055 Lakeside Commons Drive, Suite 400  
Macon GA 31210  
(478) 238-6600

DELLACONA LAW FIRM  
BY:

  
\_\_\_\_\_  
TRACEY L. DELLACONA, R.N., M.B.A.  
Ga. Bar No. 217108

6055 Lakeside Commons Drive, Suite 420  
Macon, GA 31210  
(478) 477-9000

**ATTORNEYS FOR PLAINTIFF**

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**AFFIDAVIT OF MARTIN E. LUTZ, M.D.**

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COMES NOW, Martin E. Lutz, M.D. and, after being sworn by the undersigned attesting officer, does hereby make the following Affidavit:

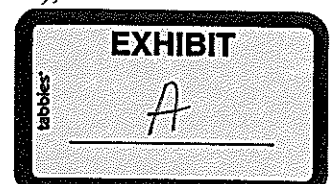
1.

Attached hereto as "Exhibit 1" is a copy of the Affiant's curriculum vitae which gives his educational background, training and experience. As set forth herein and otherwise, Affiant is duly licensed, board-certified, has professional knowledge and experience in the area of Emergency Medicine in which his opinions are given, has practiced in said area of Emergency Medicine for at least three of the last five years immediately preceding the date of the acts or omissions set forth herein and is currently practicing full-time as an Emergency Medicine Physician.

2.

Based on the Affiant's background, education, training and familiarity with the standards of medical care in the United States, and his review of the following certified records and documents:

- A. HOUSTON MEDICAL CENTER (06/17/2011 ER ADMISSION AND 06/23/2011 ER ADMISSION);
- B. PEACH REGIONAL MEDICAL CENTER (06/21/2011 ER ADMISSION);
- C. PERRY HOSPITAL (06/30/2011 ER ADMISSION);
- D. PEACH COUNTY EMS (06/21/2011 AND 06/24/2011 [sic]); and
- E. EMORY UNIVERSITY HOSPITAL OPERATIVE REPORT (07/01/2011),



Affiant makes these observations and gives the following opinions:

3.

On June 21, 2011, the Peach County EMS responded to a 911 call involving Nicole Hill, a 33-year-old female. The EMS unit arrived at Ms. Hill's location at 15:56 at which time she was complaining of leg cramps for the past one day and vaginal numbness for five hours. The EMTs' assessment of Ms. Hill indicated abnormal sensations in her lower extremities bilaterally, and she was transported via ambulance to Peach Regional Medical Center.

4.

Ms. Hill was admitted to Peach Regional Medical Center emergency department at 16:24 under the care of Quincy Jerome Jordan, M.D. She was triaged at 16:26 by MaryAnn Held, LPN, and indicated that she was experiencing leg cramps and numbness in her peri area, which had started yesterday, and that she felt dehydrated. Ms. Hill described the pain as a "9" on a scale of 1-10.

At 16:35, Winford Helton, EMTP, performed a primary nurse assessment of Ms. Hill and noted that she had cramping in her legs although she denied pain at that particular time. At 16:59, Mr. Helton indicated that Ms. Hill required further evaluation and/or treatment to rule out or treat an urgent condition. At 17:22 laboratory tests were ordered by Dr. Jordan, and the results were in at 17:45. At 19:43 Ms. Hill was seen by Bruno Denis, M.D., emergency medicine physician, who noted a history of gluteal numbness for two days with gradual onset. Ms. Hill indicated her symptoms were moderate, numbness, constant, present, improved with nothing and radiating into her posterior thigh. She also reported a history of lower back pain/neuropathy for two years and that she had been seen at Houston Medical Center and treated with steroids the last time this happened. Dr. Denis indicated that he reviewed the pertinent diagnostic tests, vital

signs, clinical notes and performed a physical examination which showed decreased sensitivity over the left dorsum of the foot. At 19:46 he determined that immediate medical attention was not indicated. At 20:04 Dr. Denis indicated Ms. Hill had no symptoms or objective findings that were life or limb threatening and that she was medically screened and stable for disposition from the unit. At 20:08 Ms. Hill received an injection of Solu-Medrol by Jorden Lemons, L.P.N., and at 20:21 was discharged by Nurse Lemons with a diagnosis of lumbosacral neuritis NOS and peripheral neuropathy, a prescription for Prednisone and instructions to apply warm compresses four times per day and to follow-up with a local clinic.

5.

On June 23, 2011 (erroneously recorded as June 24), the Peach County EMS again responded to a 911 call involving Ms. Hill. Upon their arrival at Ms. Hill's location at 16:21, she stated she had been having leg cramps and vaginal numbness since yesterday, that she was treated at Peach Regional Medical Center emergency department where she received a steroid injection, that the emergency department physician had increased her Prednisone medication, and that after the change in medication she began having vaginal pain with numbness. She also complained of painful urination and incontinence and indicated she was having increased leg cramps with decreased sensation of the left foot. Upon examination by the EMTs, Ms. Hill was noted to be incontinent of urine and to have abnormal sensation, pain/tenderness and weakness in her lower extremities bilaterally. At Ms. Hill's request, she was transported via ambulance to Houston Medical Center where she arrived at 17:05.

6.

The Houston Medical Center Emergency Department record notes that Ms. Hill was greeted at 17:20. At 18:08 she was triaged by Ashley Biron, R.N., at which time Ms. Hill



complained of right leg cramps, vaginal numbness and painful urination. She also reported urinary incontinence, burning with urination and numbness to her right leg/vagina and buttocks. She indicated the pain had progressively worsened after taking increased doses of Prednisone as instructed previously by Houston Medical Center and Peach Regional Medical Center. Ms. Hill indicated her pain to be in her right thigh/calf, 10 on a scale of 0 to 10. Nurse Biron noted Ms. Hill exhibited a stressed tensed expression.

At 20:00, Ms. Hill was seen by emergency medicine physician Jose Gumarin, M.D., at which time he obtained a history of right leg cramps, vaginal numbness, painful urination, known history of sciatica, complaining of pain to buttocks radiating down to leg, no bladder or bowel incontinence, no fever or vomiting and no weakness. He noted that the onset of symptoms was gradual, present and intermittent. Dr. Gumarin also noted that Ms. Hill stated her maximum severity as mild, as well as her current symptoms, and that she stated she was given Prednisone which helped. Dr. Gumarin indicates that he performed a complete physical examination of Ms. Hill and ordered lab work, an in and out urinary catheter, an IV and injections of Solu-Medrol, Dilaudid and Benadryl. At approximately 20:16, an additional nursing assessment was performed by Christina Kopsick, L.P.N., at which time she diagnosed an alteration in comfort related to Ms. Hill's right leg cramps/vaginal/buttock numbness. She noted that Ms. Hill had a history of sciatica and had been taking Prednisone for the left side. Nurse Kopsick documented that Ms. Hill was now having right buttock and vaginal numbness with pain shooting down her right leg and episodes of incontinence. While assisting Ms. Hill from the wheelchair to cart she noted that Ms. Hill appeared uncomfortable. Ms. Hill stated that her pain was 10 of 10. One hour after Ms. Hill received pain medication, she rated her pain as "8".

The lab results were in at 20:40 and the urine results at 21:17. At 21:21, Dr. Gumarin discussed the findings and disposition with Ms. Hill and stated that she understood the need for follow-up. He further stated that admission or further emergent workup or intervention was not indicated at that time; however, patient would need outpatient follow-up and further workup as indicated.

At 22:18, Nurse Kopsick notes that Ms. Hill was discharged home from the Emergency Department in a wheelchair accompanied by a family member. Nurse Kopsick also notes that she applied a diaper to Ms. Hill and gave her discharge instructions, which included follow-up with family doctor for further outpatient workup and evaluation. Ms. Hill was discharged at 22:16 with a diagnosis of exacerbation of sciatica. At 22:21, Dr. Gumarin indicated Ms. Hill would need an MRI as an outpatient.

7.

On June 30, 2011, Nicole Hill presented to the Perry Hospital Emergency Department complaining of sudden onset four days ago of decreased sensation in the vagina and decreased sensation and needle-like pain, moderate in severity, of her right lateral leg to her lateral toes. She also reported having urine incontinence and no bowel movement for three days. Upon examination by Herbert Frith, M.D., Ms. Hill was found to have diminished sensation in the perineum and the right lateral leg. He also noted very diminished or absent rectal tone and decreased sensation in the perineum. A Foley catheter was placed and 1100 cc of residual urine was obtained. Dr. Frith discussed the case with a neurologist who agreed that Ms. Hill's presentation was consistent with S1, S2, or a possible conus medullaris compression or perhaps cord compression. Perry Hospital could not accommodate Ms. Hill for an MRI due to her size

and arrangements were made for her transfer to Emory University Hospital Midtown. Her diagnosis at the time of transfer was cauda equina compression.

8.

Ms. Hill was admitted to Emory University Hospital Midtown under the care of Gerald Edward Rodts, M.D., where she underwent an emergency bilateral L5-S1 laminectomy and diskectomy with removal of large free fragment disc herniation. Her final diagnosis was acute cauda equina syndrome with L5-S1 acute disc herniation.

9.

It is the Affiant's opinion within a reasonable degree of medical probability and certainty, based on the facts set forth herein and the records reviewed, that Bruno Denis, M.D., the emergency medicine physician providing medical care to Nicole Hill at Peach Regional Medical Center on June 21, 2011, *as well as Quincy Jordan, M.D. if he actually examined Nicole Hill on this date*, committed one or more acts of gross negligence and failed to adhere to the standard of care generally employed by the medical profession, specifically emergency medicine physicians, under similar or like circumstances for the following reasons:

- A. On June 21, 2011, Bruno Denis, M.D. and Quincy Jordan, M.D. failed to obtain an appropriate history from Nicole Hill;
- B. On June 21, 2011, Bruno Denis, M.D. and Quincy Jordan, M.D. failed to perform an appropriate physical examination including a perineal examination of Nicole Hill followed by appropriate testing as indicated;
- C. On June 21, 2011, Bruno Denis, M.D. and Quincy Jordan, M.D. failed to perform appropriate work-up and order urgent neurosurgical consultation; and

- D. On June 21, 2011, Bruno Denis, M.D. and Quincy Jordan, M.D. failed to appropriately diagnose Nicole Hill's burgeoning cauda equina.

10.

Further, it is the Affiant's opinion within a reasonable degree of medical probability and certainty, based on the facts set forth herein and the records reviewed, that the conduct of Jose Gumarin, M.D., the emergency medicine physician providing medical care to Nicole Hill at Houston Medical Center on June 23, 2011, committed one or more acts of gross negligence and failed to adhere to the standard of care generally employed by the medical profession, specifically emergency medicine physicians, under similar or like circumstances for the following reasons:

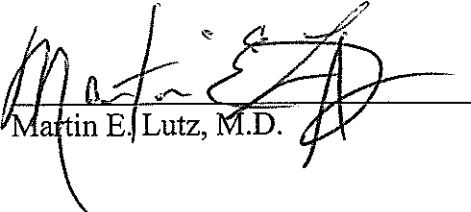
- A. On June 23, 2011, Jose Gumarin, M.D., failed to obtain an appropriate history from Nicole Hill;
- B. On June 23, 2011, Jose Gumarin, M.D., failed to perform an appropriate physical examination of Nicole Hill;
- C. On June 23, 2011, Jose Gumarin, M.D., failed to order an MRI and order urgent neurosurgical consult on Nicole Hill's behalf; and
- D. On June 23, 2011, Jose Gumarin, M.D., failed to appropriately diagnose Nicole Hill's burgeoning cauda equina.

11.

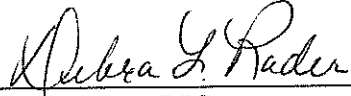
The breaches in the standard of care on the part of Bruno Denis, M.D., Quincy Jordan, M.D. and Jose Gumarin, M.D. were all acts and/or omissions below the standard of care constituting gross negligence which resulted in a loss of chance to Ms. Hill for reversal of the progressive spinal cord compromise that was occurring at that time and a better outcome.

This Affidavit is given for the limited purpose of identifying at least one act or omission of gross negligence on the part of the emergency medicine physicians, Bruno Denis, M.D., Quincy Jordan, M.D. and Jose Gumarin, M.D., and the factual basis for each such claim as required by O.C.G.A. § 9-11-9.1. As such, this Affidavit is not intended to comprehensively set forth all opinions that I may hold regarding the care and treatment of Nicole Hill. Further, because the opinions set forth in this Affidavit have been reached without review of the sworn testimony of any witnesses or any other evidence, but may be developed through the discovery process in this action, or any records, documents, materials, or things potentially pertinent to the care and treatment of Nicole Hill, other than the records identified above, the said opinions are expressly preliminary in nature. I expressly reserve the right to revise, modify and/or expand on the opinions set forth in this Affidavit.

AFFIANT SO TESTIFIES UNDER OATH.

  
Martin E. Lutz, M.D.

Sworn to and Subscribed Before Me,  
this 15<sup>th</sup> day of April, 2013.

  
\_\_\_\_\_  
NOTARY PUBLIC  
My Commission Expires: 11/9/2022

# CURRICULUM VITAE

**Martin E. Lutz, M.D., F.A.C.E.P.**  
**Medical Director, Emergency Services**  
**Greenville Hospital System University Medical Center**  
**Greenville, South Carolina**

Residence: 10 Paris Pointe Drive  
Greenville, South Carolina 29609  
(864) 246-9039

Office: Department of Emergency Medicine  
701 Grove Road  
Greenville, SC 29605  
(864) 455-6372 Fax (864) 455-5474

## TRAINING/EXPERIENCE

Emergency Medicine residency	1981- 1984
Resident Flight Physician for 19 months with "Life Flight" air ambulance, transporting patients and providing emergency services throughout an area of 150 mile radius of Toledo, Ohio.	
Deputy Medical Examiner of Greenville County	1984-Present
Chairman, Department of Emergency Medicine, Greenville Hospital System	1990-1991 and 1988-1989
Vice Chairman, Department of Emergency Medicine, Greenville Hospital System	2008-2009
Medical Director, Department of Emergency Medicine, Greenville Hospital System	7/1993-6/1998
Medical Director/Administrator, Emergency Services, Greenville Hospital System	7/1998-7/2000
Medical Director, Emergency Services, Greenville Hospital System	8/00-Present
Vice President Medical Staff, Greenville Hospital System	1/2010-Present
Emergency Medical Services Medical Control Physician	1/2009-Present
Northern Anderson County	9/2009-Present
Greenville County EMS	9/2009-Present
Mobile Care Ambulance Service EMS	3/2010-Present
Med Trans Helicopter Service	

## MEDICAL SCHOOL APPOINTMENT

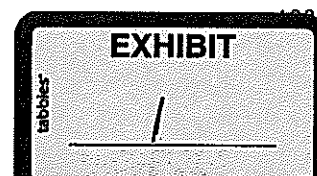
Clinical Instructor of Surgery, Medical University of South Carolina 1984-Present

## AMERICAN BOARD OF EMERGENCY MEDICINE-NATIONAL APPOINTMENT

American Board of Emergency Medicine Oral Examiner (Part II)	1988-2003
Appointed Senior Oral Examiner ABEM	2003-present
Team Leader Oral Examiner	2005-2007
Initial Certification Task Force Advisory Panel	2008-present
Oral Case Development Panel	2009

## GREENVILLE HOSPITAL SYSTEM COMMITTEES

Medical Executive Committee	1988-1991, 2006-2008, 2010
Trauma Committee	1990-present
Departmental Representative to Operations Committee, Division of Medical Education	1984-1987



## GREENVILLE HOSPITAL SYSTEM COMMITTEES (continued)

Emergency Services Committee	1992-2000 Chairman, 1992
Greenville County Emergency Preparedness (GHS representative)	1993-present 1998-2003 Chairman
Y2K Planning – Greenville County / GHS	1998-Jan.2000
Medical Advisory Committee	1998-2008
Emergency Services Coordinating Committee	2000-2008 Chairman
Credentials Committee	1995-1996 2001-2005
Medical Care Committee	1988-1991
Spine Committee	1995-1996
GHS CQI Committee	1996-1997 2004-2008
Medical Staff Developmental Task Force	1993-1994
Medical Staff Medical Research Committee	1994
GHSUMC Strategic Plan Steering Committee	2007
<b>EDUCATION</b>	
Fellow, American College of Emergency Physicians Reappointed	11/87-present 06/95
Board Certification, Part I, passed	11/84
Board Certification, Part II, passed	10/85
Recertified, Emergency Medicine	1994
Recertified, Emergency Medicine	2003
Residency:	Emergency Medicine St. Vincent Hospital & Medical Center Toledo, Ohio The Toledo Hospital, Toledo, Ohio 1981-1984
Medical School:	The Ohio State University Columbus, Ohio 1978-1981 Doctor of Medicine Degree Awards: Department of Radiology Outstanding Student Award; letters of commendation from Anesthesia, Internal Medicine, Preventive Medicine, OB/GYN and Pediatrics
Undergraduate:	John Carroll University, Cleveland, Ohio 1974-1978 Bachelor of Science in Chemistry Cum Laude Graduate - Honor Curriculum

**CERTIFICATIONS**

ACLS Instructor	1982-2000
ATLS	1984-2000

**WORK EXPERIENCE**

Attending Physician:	Greenville Memorial Hospital Emergency Trauma Center 701 Grove Road Greenville, SC 29605
1984-present	
	Greer Memorial Hospital Emergency Department Greer, SC 29650
1984-present	
	Hillcrest Hospital Emergency Department Simpsonville, SC 29681
1984-present	
	North Greenville Hospital Emergency Department Travelers Rest, SC 29690
1996-present	

**RESEARCH**

1996-2000	National Registry of Myocardial Infarction III Investigator for Greenville Hospital System
2002-2004	CRUSADE Co-Medical Director, GHS, UMC
2004-2006	CRUSADE GHSUMC Team

**VOLUNTEERISM**

1993-present	Greenville Free Medical Clinic
1998-present	Greenville County Red Cross Protocol Review
2004 – present	Greenville County Schools, AED Oversight Physician

**PRESENTATIONS/LECTURES**

Multiple lectures within the Greenville Hospital System to attending physicians, house staff, medical students and paramedics including:

- Cervical Spine
- Airway
- Evaluation of the Trauma Patient
- Advanced Cardiac Life Support
- Chest Pain
- Risk Management
- Behavioral Emergencies
- Pharmacology
- Pulmonary Emergencies
- The Red Eye
- The Cardiac Exam
- Heat Related Illness
- CVA/TIA

1996 - Speaker 3rd Annual Acute Care Nurse Practitioner Symposium



**PRESENTATIONS/LECTURES, cont.**

1997 - Participant Research Recognition Day-Greenville Hospital System

2001, 2002, 2003, 2005 & 2007 - Speaker Emergency Patient and Trauma Radiology  
at State Radiology Technologists Conference

2006 – GHSUMC Stroke Symposium

**PROFESSIONAL MEMBERSHIPS AND ACTIVITIES**

American Medical Association	1984-2000
American College of Emergency Physicians	1984-present
South Carolina ACEP	1984-present
Greenville County Medical Society	1984-2001
1994, 1995, 1997, 2000	Mini-internship participant
1995-2001	Member of the Health Care Services Committee

**LICENSURE**

Licensed in Ohio and South Carolina

**PERSONAL**

Date of Birth: March 13, 1956

Married, two children

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**AFFIDAVIT OF SHERRI BOYETT, R.N.**

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**COMES NOW**, Sherri Boyett, R.N. and, after being sworn by the undersigned attesting officer, does hereby make the following Affidavit:

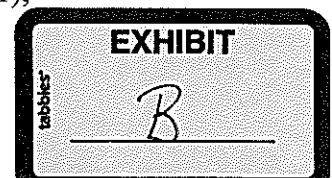
1.

Attached hereto as "Exhibit 1" is a copy of the Affiant's curriculum vitae which gives her educational background, training and experience. As set forth herein and otherwise, Affiant is duly licensed, has professional knowledge and experience in the area of Emergency Department Nursing in which her opinions are given, has practiced in said area of Emergency Department Nursing for at least three of the last five years immediately preceding the date of the acts or omissions set forth herein and is currently practicing as a hospital house supervisor, charge nurse and educator.

2.

Based on the Affiant's background, education, training and familiarity with the standards of nursing care in the United States, and her review of the following certified records and documents:

- A. HOUSTON MEDICAL CENTER (06/17/2011 ER ADMISSION AND 06/23/2011 ER ADMISSION);
- B. PEACH REGIONAL MEDICAL CENTER (06/21/2011 ER ADMISSION);
- C. PERRY HOSPITAL (06/30/2011 ER ADMISSION);
- D. PEACH COUNTY EMS (06/21/2011 AND 06/24/2011 [sic]); and
- E. EMORY UNIVERSITY HOSPITAL OPERATIVE REPORT (07/01/2011),



Affiant makes these observations and gives the following opinions:

3.

On June 21, 2011, the Peach County EMS responded to a 911 call involving Nicole Hill, a 33-year-old female. The EMS unit arrived at Ms. Hill's location at 15:56 at which time she was complaining of leg cramps for the past one day and vaginal numbness for five hours. The EMTs' assessment of Ms. Hill indicated abnormal sensations in her lower extremities bilaterally, and she was transported via ambulance to Peach Regional Medical Center.

4.

Ms. Hill was admitted to Peach Regional Medical Center emergency department at 16:24 under the care of Quincy Jerome Jordan, M.D. She was triaged at 16:26 by MaryAnn Held, LPN, and indicated that she was experiencing leg cramps and numbness in her peri (sic) area, which had started yesterday, and that she felt dehydrated. Ms. Hill described the pain as a "9" on a scale of 1-10.

At 16:35, Winford Helton, EMTP, performed a primary nurse assessment of Ms. Hill and noted that she had cramping in her legs although she denied pain at that particular time. At 16:59, Mr. Helton indicated that Ms. Hill required further evaluation and/or treatment to rule out or treat an urgent condition. At approximately 18:00 the results were in of Ms. Hill's CBC with diff and comprehensive metabolic laboratory studies. At 19:43 Ms. Hill was seen by Bruno Denis, M.D., emergency medicine physician, who noted a history of gluteal numbness for two days with gradual onset. Ms. Hill indicated her symptoms were moderate, numbness, constant, present, improved with nothing and radiating into her posterior thigh. She also reported a history of lower back pain/neuropathy for two years and that she had been seen at Houston Medical Center and treated with steroids the last time this happened. Dr. Denis indicated that he reviewed

the pertinent diagnostic tests, vital signs, clinical notes. Performed a physical examination which showed decreased sensitivity over the left dorsum of the foot. At 19:46 he determined that immediate medical attention was not indicated. At 20:04 Dr. Denis indicated Ms. Hill had no symptoms or objective findings that were life or limb threatening and that she was medically screened and stable for disposition from the unit. At 20:08 Ms. Hill received an injection of Solu-Medrol by Jordan Lemons, L.P.N., and at 20:21 was discharged by Nurse Lemons with a diagnosis of lumbosacral neuritis NOS and peripheral neuropathy, a prescription for Prednisone and instructions to apply warm compresses four times per day and to follow-up with Dr. Shetty in Fort Valley.

5.

On June 23, 2011 (erroneously recorded as June 24), the Peach County EMS again responded to a 911 call involving Ms. Hill. Upon their arrival at Ms. Hill's location at 16:21, she stated she had been having leg cramps and vaginal numbness since yesterday, that she was treated at Peach Regional Medical Center emergency department where she received a steroid injection, that the emergency department physician had increased her Prednisone medication, and that after the change in medication she began having vaginal pain with numbness. She also complained of painful urination and incontinence and indicated she was having increased leg cramps with decreased sensation of the left foot. Upon examination by the EMTs, Ms. Hill was noted to be incontinent of urine and to have abnormal sensation, pain/tenderness and weakness in her lower extremities bilaterally. At Ms. Hill's request, she was transported via ambulance to Houston Medical Center where she arrived at 17:05.

The Houston Medical Center Emergency Department record notes that Ms. Hill was greeted at 17:20. At 18:08 she was triaged by Ashley Biron, R.N., at which time Ms. Hill's chief complaint consisted of right leg cramps, vaginal numbness and painful urination. She also reported urinary incontinence, burning with urination and numbness to her right leg/vagina and buttocks. She indicated the pain had progressively worsened after taking increased doses of Prednisone as instructed previously by Houston Medical Center and Peach Regional Medical Center. Ms. Hill indicated her pain to be in her right thigh/calf, 10 on a scale of 1 to 10. Nurse Biron noted Ms. Hill exhibited a stressed tensed expression.

At approximately 20:00, Ms. Hill was seen by emergency medicine physician, Jose Gumarin, M.D., at which time he obtained a history of right leg cramps, vaginal numbness, painful urination, known history of sciatica, complaining of pain to buttocks radiating down to leg, no bladder or bowel incontinence, no fever or vomiting and no weakness. He noted that the onset of symptoms was gradual, present and intermittent. Dr. Gumarin also noted that Ms. Hill stated her maximum severity as mild, as well as her current symptoms, and that she stated she was given Prednisone which helped. Dr. Gumarin indicates that he performed a physical examination of Ms. Hill and ordered lab work, an in and out urinary catheter, an IV and injections of Solu-Medrol, Dilaudid and Benadryl. At approximately 20:16, an additional nursing assessment was performed by Christina Kopsick, L.P.N., at which time she diagnosed an alteration in comfort related to Ms. Hill's right leg cramps/vaginal/buttock numbness. She noted that Ms. Hill had a history of sciatica and had been taking Prednisone for the left side. Nurse Kopsick documented that Ms. Hill was now having right buttock and vaginal numbness with pain shooting down her right leg and episodes of incontinence. While assisting Ms. Hill from the

wheelchair to cart she noted that Ms. Hill appeared uncomfortable. Ms. Hill stated that her pain was 10 of 10. One hour after Ms. Hill received pain medication, she rated her pain as “8”.

The lab results were in at approximately 20:50 and the urine results at 21:17. At 21:21, Dr. Gumarin discussed the findings and disposition with Ms. Hill and stated that she understood the need for follow-up. He further stated that admission or further emergent workup or intervention was not indicated at that time; however, patient would need outpatient follow-up and further workup as indicated.

At 22:18, Nurse Kopsick notes that Ms. Hill was discharged home from the Emergency Department in a wheelchair accompanied by a family member. Nurse Kopsick also notes that she applied a diaper to Ms. Hill and gave her discharge instructions, which included follow-up with family doctor for further outpatient workup and evaluation. Ms. Hill was discharged at 22:16 with a diagnosis of exacerbation of sciatica. At 22:21, Dr. Gumarin indicated Ms. Hill would need an MRI as an outpatient.

7.

On June 30, 2011, Nicole Hill presented to the Perry Hospital Emergency Department complaining of sudden onset four days ago of decreased sensation in the vagina and decreased sensation and needle-like pain, moderate in severity, of her right lateral leg to her lateral toes. She also reported having urine incontinence, and no bowel movement for three days. Upon examination by Herbert Frith, M.D., Ms. Hill was found to have diminished sensation in the perineum and the right lateral leg. He also noted very diminished or absent rectal tone and decreased sensation in the perineum. A Foley catheter was placed and 1100 cc of residual urine was obtained. Dr. Frith discussed the case with a neurologist who agreed that Ms. Hill's presentation was consistent with S1, S2, or a possible conus medullaris compression or perhaps

cord compression. Perry Hospital could not accommodate Ms. Hill for an MRI due to her size and arrangements were made for her transfer to Emory University Hospital Midtown. Her diagnosis at the time of transfer was cauda equina compression.

8.

Ms. Hill was admitted to Emory University Hospital Midtown under the care of Gerald Edward Rodts, M.D., where she underwent an emergency bilateral L5-S1 laminectomy and discectomy with removal of large free fragment disc herniation. Her final diagnosis was acute cauda equina syndrome with L5-S1 acute disc herniation.

9.

It is the Affiant's opinion within a reasonable degree of medical probability and certainty, based on the facts set forth herein and the records reviewed, that the conduct of Jorden Lemons, L.P.N., the emergency medicine nurse providing nursing care to Nicole Hill at Peach Regional Medical Center on June 21, 2011, committed one or more acts of gross negligence and failed to adhere to the standard of care generally employed by the nursing profession, specifically emergency department nurses, under similar or like circumstances for the following reasons:

- A. On June 21, 2011, Jorden Lemons, L.P.N., failed to advocate for a more detailed evaluation, consultation and/or admission of Nicole Hill.

10.

Further, it is the Affiant's opinion within a reasonable degree of medical probability and certainty, based on the facts set forth herein and the records reviewed, that the conduct of Christina Kopsick, L.P.N., the emergency department nurse providing nursing care to Nicole Hill at Houston Medical Center on June 23, 2011, committed one or more acts of gross negligence and failed to adhere to the standard of care generally employed by the nursing profession,

specifically emergency medicine nurses, under similar or like circumstances for the following reasons:

- A. On June 23, 2011, Christina Kopsick, L.P.N., failed to advocate for further evaluation, consultation and/or admission of Nicole Hill;
- B. On June 23, 2011, Christina Kopsick, L.P.N., failed to inform the emergency department physician that Nicole Hill continued to complain of severe pain (8 of 10) an hour after receiving pain medications; and,
- C. On June 23, 2011, Christina Kopsick, L.P.N., failed to appreciate the signs and symptoms of a spinal cord injury as evidenced by Ms. Hill's complaints of vaginal numbness and urinary incontinence and nurse Kopsick discharged Nicole Hill with a diaper rather than reporting this information to a registered nurse and/or the emergency department physician.

11.

The breaches in the standard of care on the part of Jordan Lemons, L.P.N., and Christina Kopsick, L.P.N. were all acts and/or omissions below the standard of care constituting gross negligence which resulted in a loss of chance to Ms. Hill for reversal of the progressive spinal cord compromise that was occurring at that time and a loss of chance for a better outcome.

12.

This Affidavit is given for the limited purpose of identifying at least one act or omission of gross negligence on the part of the emergency department nurses, Jordan Lemons, L.P.N., and Christina Kopsick, L.P.N., and the factual basis for each such claim as required by O.C.G.A. § 9-11-9.1. As such, this Affidavit is not intended to comprehensively set forth all opinions that I may hold regarding the care and treatment of Nicole Hill. Further, because the opinions set forth



in this Affidavit have been reached without review of the sworn testimony of any witnesses or any other evidence, but may be developed through the discovery process in this action, or any records, documents, materials, or things potentially pertinent to the care and treatment of Nicole Hill, other than the records identified above, the said opinions are expressly preliminary in nature. I expressly reserve the right to revise, modify and/or expand on the opinions set forth in this Affidavit.

AFFIANT SO TESTIFIES UNDER OATH.

Sherri Boyett, RN  
Sherri Boyett, R.N.

Sworn to and Subscribed Before Me,  
this 17 day of April, 2013.

M. Elaine Vaughn  
NOTARY PUBLIC  
My Commission Expires: \_\_\_\_\_

M. ELAINE VAUGHN  
NOTARY PUBLIC  
BIBB COUNTY, GA  
MY COMMISSION EXPIRES  
AUGUST 1, 2016

**SHERRI BOYETT**

301 Corder Road, Apt. 413, Warner Robins, Ga. 31088 | 478-550-3734 | sherriboyett@aol.com

**EDUCATION**

Western Governor's University  
RN-MSN  
Focus: Nursing Education

anticipated graduation 2014

Darton College  
Associates Degree in Nursing 2010

Middle Georgia Technical College  
Licensed Practical Nurse 2006

**RELATED EXPERIENCE**

Regency Hospital, Macon, Georgia  
RN

2011 –

Primary responsibilities are to regulate our Infection Control program and New Employee Orientation/Education. As House Supervisor and Charge Nurse I make sure all hospital, state and federal policies are followed. I compile data on a monthly, quarterly and annual basis to provide to NHSN and CDC. I provide ongoing education to family, visitors, patients and staff relating to disease process, pathogens, modes of transmission and evidenced based practices. RN duties include: medication administration, lab draws, foley catheter insertion and care, ROM exercises, complete assessments, Intravenous Therapy and starts, Accessing port-a-caths, deaccessing port-a-caths, care and use of PICC lines as well as other duties as needed. At Regency Hospital, I am certified to provide health and safety information to NHSN- National HealthCare and Safety Network.

Houston Health Care  
RN Staff Nurse, Charge Nurse

2007- -- 2011

Set up daily patient care assignments, provided patient care, ensured documentation was accurate and timely, administered treatment and medications per physician order. Provided education to patients and family members regarding diagnosis, medications, signs and symptoms of change in condition and community resources for help, as needed. RN duties include: medication administration, lab draws, foley catheter insertion and care, ROM exercises, complete assessments, intravenous Therapy and starts, Accessing port-a-caths, deaccessing port-a-caths, care and use of PICC lines as well as other duties, as needed.

Heart of Georgia Hospice  
RN

2010

Provide Care and Comfort to dying patients.

**LANGUAGES**

[English – native language]

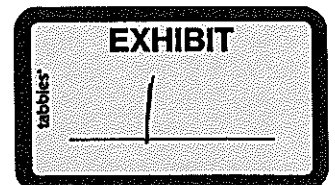
**CERTIFICATIONS**

ACLS- ADVANCED CARDIAC LIFE SUPPORT

TNCC- TRAUMA NURSING

PALS- PEDIATRIC ADVANCED LIFE SUPPORT

NHSN-NATIONAL HEALTHCARE SAFETY NETWORK



**MEMBERSHIPS**

**GNA- Georgia Nurse's Association**

## SERVICE INSTRUCTIONS

Defendant Quincy Jerome Jordan, M.D. may be served at his place of employment, Peach Regional Medical Center, 601 Blue Bird Boulevard, Fort Valley, Peach County, Georgia 31030.

Defendant Bruno Denis, M.D. may be served at his place of employment, Putnam General Hospital, 101 Lake Oconee Parkway, Eatonton, Georgia 31024.

Defendant Jose Gumarin, M.D. may be served at his place of employment, Houston Medical Center, 1601 Watson Boulevard, Warner Robins, Houston County, Georgia 31093.

Defendant Jorden Lemons, L.P.N., may be served at his residence, 431-D Ed Stephens Road, Cobb, Georgia 31735.

Defendant Christina Kopsick, L.P.N./R.N., may be served at her residence, 142 Holly Pointe, Warner Robins, Houston County, Georgia 31088.

Defendant The Hospital Authority of Peach County d/b/a Peach Regional Medical Center may be served through its Administrator/CEO, Nancy Peed, 601 Blue Bird Boulevard, Fort Valley, Peach County, Georgia 31030.

Defendant Central Georgia Health Systems, Inc. may be served through its Registered Agent, Kenneth B. Banks, 691 Cherry Street, Ste 700, Macon, Georgia 31201.

Defendant The Medical Center of Central Georgia, Inc. may be served through its Registered Agent, Kenneth B. Banks, 691 Cherry Street, Ste 700, Macon, Georgia 31201.

Defendant The Medical Center of Central Georgia, Inc. d/b/a Peach Regional Medical Center may be served through its Registered Agent, Kenneth B. Banks, 691 Cherry Street, Ste 700, Macon, Georgia 31201.

Defendant Peach Emergency Physicians, LLC may be served through its Registered Agent, CT Corporation System, 1201 Peachtree Street, NE, Atlanta, Fulton County, Georgia 30361.

Defendant Houston Healthcare System, Inc. d/b/a Houston Medical Center may be served through its Registered Agent, Cary W. Martin, 1601 Watson Boulevard, Warner Robins, Houston County, Georgia 31093.

EmCare, Inc. can be served with process by serving its registered agent, Corporation Service Company, 40 Technology Parkway South, Suite 300, Norcross, Gwinnett County, Georgia 30092.

EmCare Physician Providers, Inc. can be served with process, by serving its registered agent, Corporation Service Company, 40 Technology Parkway South, Suite 300, Norcross, Gwinnett County, Georgia 30092.

EmCare Physician Services, Inc. can be served with process, by serving its registered agent, Corporation Service Company, 40 Technology Parkway South, Suite 300, Norcross, Gwinnett County, Georgia 30092.

Georgia EM-I Medical Services, P.C. can be served with process, by serving its registered agent, Corporation Service Company, 40 Technology Parkway South, Suite 300, Norcross, Gwinnett County, Georgia 30092.

Georgia EM-II, Inc. can be served with process by serving its registered agent, Corporation Service Company, 40 Technology Parkway South, Suite 300, Norcross, Gwinnett County, Georgia 30092.