



5. An affidavit from a qualified, licensed Georgia attorney attesting to Merritt's professional negligence in failing to timely file Shirley's suit is attached to this complaint as Exhibit 1.

6. As a result of Merritt's professional negligence, Shirley's suit against Dr. Edwards is time barred.

7. Had Merritt timely filed the suit, Shirley would've collected damages, as Dr. Edwards breached the standard of care in treating Shirley on June 14, 2012. To date, Shirley's medical bills caused by Dr. Edwards' negligence are close to \$2 million dollars, and continue to grow by hundreds of thousands of dollars each year.

8. Merritt is liable to Shirley as a result of Merritt's professional negligence.

Respectfully submitted, this 28th day of July, 2017.

GREEN, SAPP & MORIARTY, LLP

/s/ Daniel J. Moriarty  
DANIEL J. MORIARTY  
Georgia Bar No. 689867

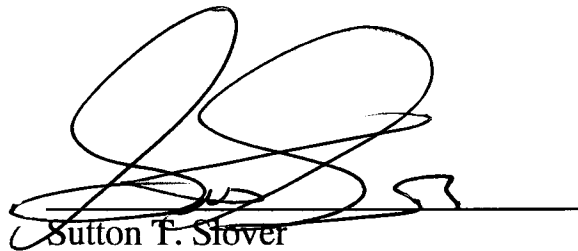
750 Hammond Drive  
Building 8, Suite 200  
Atlanta, Georgia 30328  
770-690-8001 (Telephone)  
770-690-8206 (Facsimile)  
dmoriarty@greensapp.com

## AFFIDAVIT OF SUTTON T. SLOVER

The affiant swears as follows:

1. I, Sutton T. Slover, am an attorney licensed to practice in the State of Georgia. I have been continuously licensed since 2007.
2. During that time, I have filed and litigated hundreds of personal-injury cases, including medical-malpractice cases.
3. With exceptions not applicable here, Georgia law requires that medical-malpractice cases be filed within two years of the negligent treatment.
4. Cindy Shirley employed attorney Richard V. Merritt on October 7, 2012 to file a medical-malpractice suit against David L. Edwards, M.D. arising from Dr. Edward's negligent treatment on June 14, 2012.
5. Merritt breached the standard of care in failing to file Shirley's suit against Dr. Edwards by June 14, 2014.

This 27th day of July, 2017.



Sutton T. Slover

The affiant was under oath and signed the affidavit in my presence, in Fulton County, Georgia, this 27th day of July, 2017.

Notary Public:

