

ARIEL M. KNIGHTS)	CASE NO. 2013 03 1267
)	
)	JUDGE AMY CORRIGALL JONES
Plaintiff,)	
)	
v.)	PLAINTIFF'S LIST OF EXPERT
)	WITNESSES
AKRON WOMEN'S MEDICAL)	
GROUP , ET AL)	
)	
)	
Defendants.)	
)	

NOW COMES Ariel Knights nka Ariel Krusinski, and hereby provides the following list of expert witnesses:

1. Anthony Levatino, M.D. (report attached)
2. John Stewart, M.D.
3. Any of the treating medical providers.

Respectfully submitted,

JAMES J. GUTBROD, ATTORNEY AT LAW

s/ James J. Gutbrod
JAMES J. GUTBROD (0034414)
Attorney for Plaintiff
4367 State Road
Akron, Ohio 44319
Telephone: (330) 475-1584
Fax: (330) 475-0294
E-mail: jim@jgutbrod.com

A copy of the foregoing was sent by electronic mail this 30th day of May, 2014 to the following:

Cheryl Atwell, Esq.
Reminger Co., LPA
CATwell@reminger.com

s/ James J. Gutbrod
JAMES J. GUTBROD

Anthony P. Levatino, M.D., J.D.
4219 Harp Court
Las Cruces, New Mexico 88011

May 28, 2014

James J. Gutbrod, Esq.
4367 State Road
Akron, Ohio 44319

Re: Ariel Knights v. Akron Women's Medical Group

Mr. Gutbrod:

I am a board-certified Obstetrician/Gynecologist and have performed hundreds of first and second trimester abortions up to 24 weeks gestation. As requested, I have reviewed records of care provided to Ms. Ariel Knights in February and March 2012 by defendants Akron Women's Medical Group and Raymond Robinson, MD. It is my opinion, that I render to a reasonable degree of medical certainty, that Akron Women's Medical Group deviated from a reasonable standard of care in the following ways:

Failure to allow Ms. Knights to meet the doctor who would perform her abortion at least 24 hours in advance of the abortion procedure as required by Ohio state law and as stated in the clinic's intake forms.

Failure to ensure, through adequate protocol and procedure, that Dr. Robinson was aware of the patient's history of uterus didelphys.

Failure to ensure, through adequate protocol and procedure, that Dr. Robinson was aware of the results of the plaintiff's pre-procedure ultrasound at Akron Women's Medical Group that showed a singleton pregnancy in the right side of her uterus didelphys.

Failure of Ms. Linda Roudenbush, as ultrasound technician performing ultrasound during the abortion procedure, to alert Dr. Robinson to the fact that he had failed to terminate Ms. Knights' pregnancy as intended.

Failure to ensure, through adequate protocol and procedure, that all tissue recovered from the abortion procedure be submitted for pathologic examination.

It is my opinion, that I render to a reasonable degree of medical certainty, that Raymond Robinson, MD deviated from a reasonable standard of care in the following ways:

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Failure to meet with Ms. Knights at least 24 hours in advance of the abortion procedure as required by Ohio state law and as stated in the clinic's intake forms.

Failure to adequately review, prior to performing the abortion procedure, the history provided by Ms. Knights as part of her intake including her history of uterus didelphys.

Failure to adequately review, prior to performing the abortion procedure, the ultrasound performed on Ms. Knights as part of her intake including the finding of uterus didelphys with an intrauterine pregnancy in the right side of her uterus didelphys.

Failure to adequately perform a pre-procedure examination of Ms. Knights prior to performing an abortion procedure.

Failure to terminate Ms. Knights' pregnancy as planned despite the use of ultrasound during the procedure.

Failure to submit all tissue recovered from the abortion procedure for pathologic examination.

It is my opinion, that I render to a reasonable degree of medical certainty, that plaintiff suffered damages as a result of the above named defendants negligence including but not limited to:

Physical pain and suffering.

Mental pain and suffering.

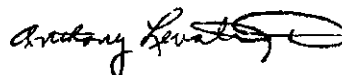
Medical Expenses

Lost Income

Continuing pregnancy.

Please feel free to contact me if I can be of further assistance.

Very truly yours,



Anthony Levatino, MD, JD