

SUMMONS - CIVIL

JD-CV-1 Rev. 2-22
 C.G.S. §§ 51-346, 51-347, 51-349, 51-350, 52-45a, 52-48, 52-259;
 P.B. §§ 3-1 through 3-21, 8-1, 10-13

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 ADA accommodations,
 contact a court clerk or
 go to: www.jud.ct.gov/ADA.

STATE OF CONNECTICUT
SUPERIOR COURT
www.jud.ct.gov

**Instructions are on page 2.**

- Select if amount, legal interest, or property in demand, not including interest and costs, is LESS than \$2,500.
- Select if amount, legal interest, or property in demand, not including interest and costs, is \$2,500 or MORE.
- Select if claiming other relief in addition to, or in place of, money or damages.

TO: Any proper officer

By authority of the State of Connecticut, you are hereby commanded to make due and legal service of this summons and attached complaint.

Address of court clerk (Number, street, town and zip code) 95 WASHINGTON STREET, HARTFORD, CT 06106		Telephone number of clerk (860) 548 - 2700	Return Date (Must be a Tuesday) 04-09-2024
<input checked="" type="checkbox"/> Judicial District <input type="checkbox"/> Housing Session	G.A. Number: _____	At (City/Town) HARTFORD	Case type code (See list on page 2) Major: T Minor: 28

For the plaintiff(s) enter the appearance of:

Name and address of attorney, law firm or plaintiff if self-represented (Number, street, town and zip code) MILLER, ROSNICK, D'AMICO, AUGUST & BUTLER, P.C. 1087 BROAD ST, BRIDGEPORT, CT 06604	Juris number (if attorney or law firm) 038116
Telephone number (203) 334 - 0191	Signature of plaintiff (if self-represented)

The attorney or law firm appearing for the plaintiff, or the plaintiff if self-represented, agrees to accept papers (service) electronically in this case under Section 10-13 of the Connecticut Practice Book. Yes No

E-mail address for delivery of papers under Section 10-13 of the Connecticut Practice Book (if agreed)
CHARLES@MILLERANDROSNICK.COM

Parties	Name (Last, First, Middle Initial) and address of each party (Number; street; P.O. Box; town; state; zip; country, if not USA)	
First plaintiff	Name: MONICA LYNCH Address: 22 Surrey Drive Wallingford, CT 06492	P-01
Additional plaintiff	Name: Address:	P-02
First defendant	Name: MIDSTATE RADIOLOGY ASSOCIATES, LLC 101 North Plains Industrial Road, Bldg 1A, Wallingford, CT Address: Agent for Service: Pullman Comley, LLC 850 Main Street, 8th FL, Bridgeport 06604	D-01
Additional defendant	Name: MIDSTATE MEDICAL CENTER 435 Lewis Avenue Meriden, CT 06451 Address: Agent for Service: Corporation Service Company Goodwin Sq. 225 Asylum St. 20th FL, Hartford, CT	D-02
Additional defendant	Name: HARTFORD HEALTHCARE CORPORATION 100 Pearl St., 2nd FL., CLO, Hartford, CT 06103 Address: Agent for Service: Corporation Service Company Goodwin Sq. 225 Asylum St. 20th FL, Hartford, CT	D-03
Additional defendant	Name: Address:	D-04
Total number of plaintiffs: 1		Total number of defendants: 3
<input type="checkbox"/> Form JD-CV-2 attached for additional parties		

Notice to each defendant

- You are being sued.** This is a summons in a lawsuit. The complaint attached states the claims the plaintiff is making against you.
- To receive further notices, you or your attorney must file an *Appearance* (form JD-CL-12) with the clerk at the address above. Generally, it must be filed on or before the second day after the Return Date. The Return Date is not a hearing date. You do not have to come to court on the Return Date unless you receive a separate notice telling you to appear.
- If you or your attorney do not file an *Appearance* on time, a default judgment may be entered against you. You can get an *Appearance* form at the court address above, or on-line at <https://jud.ct.gov/webforms/>.
- If you believe that you have insurance that may cover the claim being made against you in this lawsuit, you should immediately contact your insurance representative. Other actions you may take are described in the Connecticut Practice Book, which may be found in a superior court law library or on-line at <https://www.jud.ct.gov/pb.htm>.
- If you have questions about the summons and complaint, you should talk to an attorney.

The court staff is not allowed to give advice on legal matters.

Date 02-16-2024	Signed (Sign and select proper box) 	<input checked="" type="checkbox"/> Commissioner of Superior Court <input type="checkbox"/> _____ Clerk	Name of person signing CHARLES B. PRICE JR.
If this summons is signed by a Clerk: a. The signing has been done so that the plaintiff(s) will not be denied access to the courts. b. It is the responsibility of the plaintiff(s) to ensure that service is made in the manner provided by law. c. The court staff is not permitted to give any legal advice in connection with any lawsuit. d. The Clerk signing this summons at the request of the plaintiff(s) is not responsible in any way for any errors or omissions in the summons, any allegations contained in the complaint, or the service of the summons or complaint.			<i>For Court Use Only</i> File Date
I certify I have read and understand the above:	Signed (Self-represented plaintiff)	Date	Docket Number

Instructions

1. Type or print legibly. If you are a self-represented party, this summons must be signed by a clerk of the court.
2. If there is more than one defendant, make a copy of the summons for each additional defendant. Each defendant must receive a copy of this summons. Each copy of the summons must show who signed the summons and when it was signed. If there are more than two plaintiffs or more than four defendants, complete the Civil Summons Continuation of Parties (form JD-CV-2) and attach it to the original and all copies of the summons.
3. Attach the summons to the complaint, and attach a copy of the summons to each copy of the complaint. Include a copy of the Civil Summons Continuation of Parties form, if applicable.
4. After service has been made by a proper officer, file the original papers and the officer's return of service with the clerk of the court.
5. Use this summons for the case type codes shown below.

Do not use this summons for the following actions:

- | | |
|---|---|
| (a) Family matters (for example divorce, child support, custody, parentage, and visitation matters) | (e) Administrative appeals |
| (b) Any actions or proceedings in which an attachment, garnishment or replevy is sought | (f) Proceedings pertaining to arbitration |
| (c) Applications for change of name | (g) Summary Process (Eviction) actions |
| (d) Probate appeals | (h) Entry and Detainer proceedings |
| | (i) Housing Code Enforcement actions |

Case Type Codes

MAJOR DESCRIPTION	CODE Major/Minor	MINOR DESCRIPTION	MAJOR DESCRIPTION	CODE Major/Minor	MINOR DESCRIPTION
Contracts	C 00	Construction - All other	Property	P 00	Foreclosure
	C 10	Construction - State and Local		P 10	Partition
	C 20	Insurance Policy		P 20	Quiet Title/Discharge of Mortgage or Lien
	C 30	Specific Performance		P 30	Asset Forfeiture
	C 40	Collections	P 90	All other	
	C 50	Uninsured/Underinsured Motorist Coverage	Torts (Other than Vehicular)	T 02	Defective Premises - Private - Snow or Ice
	C 60	Uniform Limited Liability Company Act - C.G.S. 34-243		T 03	Defective Premises - Private - Other
C 90	All other	T 11		Defective Premises - Public - Snow or Ice	
Eminent Domain	E 00	State Highway Condemnation		T 12	Defective Premises - Public - Other
	E 10	Redevelopment Condemnation		T 20	Products Liability - Other than Vehicular
	E 20	Other State or Municipal Agencies		T 28	Malpractice - Medical
	E 30	Public Utilities & Gas Transmission Companies		T 29	Malpractice - Legal
	E 90	All other		T 30	Malpractice - All other
Housing	H 10	Housing - Return of Security Deposit		T 40	Assault and Battery
	H 12	Housing - Rent and/or Damages		T 50	Defamation
	H 40	Housing - Housing - Audita Querela/Injunction	T 61	Animals - Dog	
	H 50	Housing - Administrative Appeal	T 69	Animals - Other	
	H 60	Housing - Municipal Enforcement	T 70	False Arrest	
	H 90	Housing - All Other	T 71	Fire Damage	
Miscellaneous	M 00	Injunction	T 90	All other	
	M 10	Receivership	Vehicular Torts	V 01	Motor Vehicles* - Driver and/or Passenger(s) vs. Driver(s)
	M 15	Receivership for Abandoned/Blighted Property		V 04	Motor Vehicles* - Pedestrian vs. Driver
	M 20	Mandamus		V 05	Motor Vehicles* - Property Damage only
	M 30	Habeas Corpus (extradition, release from Penal Institution)		V 06	Motor Vehicle* - Products Liability Including Warranty
	M 40	Arbitration		V 09	Motor Vehicle* - All other
	M 50	Declaratory Judgment		V 10	Boats
	M 63	Bar Discipline		V 20	Airplanes
	M 66	Department of Labor Unemployment Compensation Enforcement		V 30	Railroads
	M 68	Bar Discipline - Inactive Status		V 40	Snowmobiles
	M 70	Municipal Ordinance and Regulation Enforcement		V 90	All other
	M 80	Foreign Civil Judgments - C.G.S. 52-604 & C.G.S. 50a-30	*Motor Vehicles include cars, trucks, motorcycles, and motor scooters.		
	M 83	Small Claims Transfer to Regular Docket	Wills, Estates and Trusts	W 10	Construction of Wills and Trusts
	M 84	Foreign Protective Order		W 90	All other
	M 89	CHRO Action in the Public Interest - P.A. 19-93			
	M 90	All other			

RETURN DATE: APRIL 9, 2024 : SUPERIOR COURT
MONICA LYNCH : J.D. OF HARTFORD
VS. : AT HARTFORD
MIDSTATE RADIOLOGY ASSOCIATES, LLC;
MIDSTATE MEDICAL CENTER;
HARTFORD HEALTHCARE CORPORATION : FEBRUARY 16, 2024

COMPLAINT

COUNT ONE: MONICA LYNCH v. MIDSTATE RADIOLOGY ASSOCIATES, LLC (Medical Malpractice)

1. At all times relevant, the plaintiff MONICA LYNCH, was a resident of Wallingford, Connecticut.

2. Pursuant to Connecticut General Statute § 52-190a, plaintiff's counsel has appended to this Complaint, a copy of plaintiff's counsel's certificate of reasonable inquiry in support of this action, along with a redacted written and signed opinion letter of a similar health care provider as defined by Connecticut General Statutes 52-184c (attached herewith as Exhibit A).

3. At all times relevant, the defendant, HARTFORD HEALTHCARE CORPORATION (hereinafter "HHC"), was a domestic non-stock corporation organized and existing under the laws of the State of Connecticut, owned, maintained, and operated General Medical and Surgical Hospitals in Connecticut, including defendant MIDSTATE MEDICAL CENTER (hereinafter, "MMC"), in

Meriden, Connecticut, supplying physicians, radiologists, radiology technicians, physician's assistants, nurses, and other healthcare professionals to the same for the treatment of the general public, including the plaintiff, MONICA LYNCH.

4. In March 2022 and continuing to the present time, MMC was and is an acute care hospital that provides healthcare services to the public, including radiologic services, in exchange for compensation.

5. At all times relevant to this action, defendant, MIDSTATE RADIOLOGY ASSOCIATES, LLC (hereinafter, "MIDSTATE RADIOLOGY"), is a Connecticut limited liability company existing under the laws of the State of Connecticut.

6. At all times mentioned herein, defendants HHC, MMC, and MIDSTATE RADIOLOGY (hereinafter collectively, "MIDSTATE DEFENDANTS"), and the physicians, residents, and radiologists who practice at MMC, held themselves out to the general public, including plaintiff MONICA LYNCH, as being, ready, willing, and able to provide for the care and treatment of patients requiring radiologic care at MMC, including plaintiff MONICA LYNCH.

7. At all times mentioned herein, the MIDSTATE DEFENDANTS held MMC out to the general public, including plaintiff MONICA LYNCH, as having specialized facilities, physicians, and staff for the care and treatment of patients

with emergent conditions, including the defendant, MIDSTATE RADIOLOGY, that provided radiologic services for patients of MMC.

8. At all times relevant to this action, the MIDSTATE DEFENDANTS and its administrative and medical staff supervised the evaluation of inpatients and outpatients of MMC and supervised, control, and limited, as deemed medically appropriate, the care and treatment of patients including plaintiff MONICA LYNCH, and the standard of medical practice followed by its physicians and staff.

9. At all times relevant to this action, the MIDSTATE DEFENDANTS employed full-time staff, including the defendant MIDSTATE RADIOLOGY, and physicians, residents, fellows, nurses, and other staff, to assist members of its medical staff in rendering medical care and treatment, to recommend appropriate medical care and treatment based upon their examination of patients of MMC, including plaintiff MONICA LYNCH and to implement appropriate care and treatment where necessary.

10. At all times relevant to this action, the MIDSTATE DEFENDANTS engaged, agreed, undertook, and held themselves out as being ready, willing, and able to provide for the care and treatment of patients admitted to its facility, and competent physicians, physicians assistants, residents, and/or fellows to meet the requirements of the treatment and care of the patients received by it, having due regard to the state and condition of health and infirmity of such

patients, actual or reasonably to be anticipated and having due regard to the quality and quantity of staff, servants, employees, provisions, facilities, care, diligence, and supervision provided and furnished generally by similar hospitals.

11. At all times relevant to this action, the MIDSTATE DEFENDANTS, acting through their administrators and medical staff, exercised control and supervision over the care rendered to medical patients admitted to the MMC by members of their medical staff and health system.

12. During the time Ms. Lynch was at MMC, it was reasonable for her to believe that the services being rendered by the physicians and medical staff were being rendered by employees or authorized agents of the MIDSTATE DEFENDANTS and on behalf of the MIDSTATE DEFENDANTS.

13. At all times relevant to this action, the MIDSTATE DEFENDANTS represented that they would provide to their patients including plaintiff MONICA LYNCH, appropriately trained and experienced personnel, as well as facilities and equipment to meet the requirements for the treatment and care of the patients admitted to MMC.

14. In order to ensure that MMC patients received proper care and treatment, the MIDSTATE DEFENDANTS were required to train, supervise, oversee, and direct their employees, servants, and/or agents, including physicians, residents, and/or fellows, and to ensure that all patient care complied

with the applicable standard of care, as well as the guidelines, policies, protocols, and rules and regulations of the defendants HHC and MMC.

15. At all times relevant to this action, the MIDSTATE DEFENDANTS through their officers, executives, administrators, employees, agents, and medical staff, were responsible for establishing, implementing, and enforcing rules, regulations, by-laws, protocols, guidelines, and standards of care regarding the treatment of patients at MMC, the training, supervision, and monitoring of employees and staff practice of medicine, with specific regard to Radiology, including but not limited to the performance and completion of computed tomography (CT) scans, and the professional competence and skill of employees and staff.

16. At all times relevant herein, the MIDSTATE DEFENDANTS were required to supervise, monitor, and enforce their written protocols, guidelines, and policies regarding CT scans to ensure compliance by the members of their medical staff, employees, and contractors.

17. As healthcare providers, the MIDSTATE DEFENDANTS, including their employees, agents, apparent agents, and/or servants, were required to provide the plaintiff with that level of care, skill, and treatment which, in light of all relevant surrounding circumstances, was recognized as acceptable and appropriate by reasonably prudent similar health care providers.

18. As health care providers, the MIDSTATE DEFENDANTS were required to provide to the plaintiff MONICA LYNCH, that level of care and skill and treatment which, in light of all relevant surrounding circumstances, is recognized as acceptable and appropriate by reasonably prudent similar health care providers and they failed to do so.

19. On or about March 11, 2022, at approximately 5:30 p.m., the plaintiff, MONICA LYNCH, collapsed at her home located at 22 Surrey Drive, Wallingford, Connecticut 06492.

20. The plaintiff, MONICA LYNCH was found on the floor of her home with weakness of her left side and slurred speech; her husband called 911 for an ambulance.

21. The plaintiff, MONICA LYNCH, was taken by ambulance to defendant MMC where she was diagnosed as having suffered a stroke.

22. On March 11, 2021, the plaintiff, MONICA LYNCH, was required to undergo a CT to diagnose and evaluate her condition.

23. Despite the plaintiff, MONICA LYNCH'S cognitive, neurological, and motor-skill impairments as a result of her stroke, her body/limbs were not secured to the CT scan table.

24. At the same time and place, but prior to the performance of the CT scan, the plaintiff MONICA LYNCH fell off the CT scan table onto the floor sustaining the injuries and losses as hereinafter stated.

25. The injuries and damages suffered by the plaintiff MONICA LYNCH, were caused by the negligence of the defendant MIDSTATE RADIOLOGY, through its agents, apparent agents, servants and/or employees, in the care, evaluation and treatment of the plaintiff MONICA LYNCH while she was a patient of defendant MIDSTATE RADIOLOGY, in that they failed to exercise the skill, care and/or diligence ordinarily exercised by similar health care providers under similar circumstances, in one or more of the following ways:

- (a) failing to secure plaintiff MONICA LYNCH with a safety strap or other restraining device or modality, to prevent her from falling off the CT scanning table;
- (b) failing to attend to positioning safety of plaintiff MONICA LYNCH on the CT scanning table in order to prevent her from falling off the CT scanning table;
- (c) failing to provide reasonable and proper attention plaintiff MONICA LYNCH to prevent her from falling off the CT scanning table;
- (d) failing to recognize the risk that plaintiff MONICA LYNCH may fall of the CT scanning table if she was not properly secured to the CT scanning table by safety straps or other means;

- (e) failure to ensure the safety and well-being of plaintiff MONICA LYNCH at the time she was about to undergo a CT scan;
- (f) failing to adequately and properly care for plaintiff MONICA LYNCH at the time she was to undergo a CT scan by providing appropriately trained and supervised personnel;
- (g) failing to avoid a radiologic technology practice created an unnecessary danger to plaintiff MONICA LYNCH'S life, health or safety;
- (h) violation of one or more of the following sections of the Regulations of Connecticut State Agencies: Section 19-13-D(b)(2); Section 19-13D3(c)(2); Section 19-13 D3 (e) (1); Section 19-13D3(i)(6) all of which relate to patient safety, including having in place adequate mechanisms to prevent a patient undergoing a CT scan from falling off the CT scanning table and to ensure that fall risk interventions were in place to prevent falls;
- (i) failing to develop, promulgate and/or enforce adequate rules, regulations, standards, policies and protocols for the care, evaluation, monitoring and supervision of patients like plaintiff MONICA LYNCH to prevent such patients from falling off tables used for imaging studies prior to, during or after such studies.

26. As a result of the carelessness of the negligence of defendant MIDSTATE RADIOLOGY, and their agent(s), apparent agent(s), and/or employee(s) plaintiff MONICA LYNCH suffered the following severe, serious, painful and permanent injuries:

- (a) Acute fractures of bilateral lamina of C5 vertebrae;
- (b) Acute fracture of the right inferior articular facet of C6 vertebrae;

- (c) Acute non-displaced fracture of the right lamina/superior articular process of the C7 vertebrae;
- (d) Acute fractures of the left transverse processes of C7 and T1 vertebrae;
- (e) Bleeding and swelling of the epidural space at C1-C7;
- (f) Acute fracture of bilateral 1st ribs;
- (g) Soft tissue contusion of the posterior paraspinal muscles;

27. As a further result of the negligence and carelessness of defendant MIDSTATE RADIOLOGY, their agent(s), apparent agent(s), and/or employee(s), the plaintiff MONICA LYNCH was deprived of the opportunity to receive TPA medication to ameliorate the effects of the stroke which she was diagnosed as having suffered.

28. As a further result of the negligence and carelessness of defendant MIDSTATE RADIOLOGY, their agent(s), apparent agent(s), and/or employee(s), the plaintiff MONICA LYNCH has incurred and will incur, expenses for hospital care, medical care and attention, medicines, x-rays, supplies orthopedic care, physical therapy, prescriptions and the like, and will be obligated to make such expenditures in the future for treatment and evaluation for her injuries.

29. As a further of the negligence and carelessness of MIDSTATE RADIOLOGY, their agent(s), apparent agent(s), and/or employee(s), the plaintiff

MONICA LYNCH, she has sustained, or will sustain, a loss of earnings and/or earning capacity.

30. As a result of the negligence and carelessness of defendant MIDSTATE RADIOLOGY, their agent(s), apparent agent(s), and/or employee(s), the plaintiff MONICA LYNCH, has been forced to suffer, and will continue to suffer, a loss and restriction of her enjoyment of life's activities.

31. As a further result of the negligence and carelessness of defendant MIDSTATE RADIOLOGY, the plaintiff MONICA LYNCH, has been forced to suffer, and will continue to suffer, pain, anxiety and emotional distress.

COUNT TWO: MONICA LYNCH v. HARTFORD HEALTHCARE CORPORATION (Vicarious Liability)

1-31. Paragraphs 1 through 31 of Count One are hereby incorporated as Paragraphs 1 through 31 of this Count Two as if fully re-alleged herein.

32. At all times during the evaluation and treatment of the plaintiff, MONICA LYNCH, as outlined above, MIDSTATE RADIOLOGY was an agent, apparent agent, servant, and/or employee of HARTFORD HEALTHCARE CORPORATION and was acting within the scope of their agency/employment and in the furtherance of the interests of HARTFORD HEALTHCARE CORPORATION.

33. HARTFORD HEALTHCARE CORPORATION is liable for all of the injuries and damages caused by the negligence of MIDSTATE RADIOLOGY, as alleged above.

**COUNT THREE: MONICA LYNCH v. MIDSTATE MEDICAL CENTER
(Vicarious Liability)**

1-31. Paragraphs 1 through 31 of Count One are hereby incorporated as Paragraphs 1 through 31 of this Count Three as if fully re-alleged herein.

32. At all times during the evaluation and treatment of the plaintiff, MONICA LYNCH, as outlined above, MIDSTATE RADIOLOGY was an agent, apparent agent, servant, and/or employee of HARTFORD HEALTHCARE CORPORATION and was acting within the scope of their agency/employment and in the furtherance of the interests of HARTFORD HEALTHCARE CORPORATION.

33. HARTFORD HEALTHCARE CORPORATION is liable for all of the injuries and damages caused by the negligence of MIDSTATE RADIOLOGY, as alleged above.

WHEREFORE, the Plaintiff claims:

1. Monetary damages; and,
2. Such other, further and different relief as this court may deem just

and equitable.

THE PLAINTIFF,

BY 

CHARLES B. PRICE
MILLER, ROSNICK, D'AMICO,
AUGUST & BUTLER, P.C.
1087 Broad Street
Bridgeport, CT 06604
Phone: 203-334-0191
Fax: 203-334-3463
E-Mail:
Charles@millerandrosnick.com
Juris No. 301855

RETURN DATE: APRIL 9, 2024 : SUPERIOR COURT
MONICA LYNCH : J.D. OF HARTFORD
VS. : AT HARTFORD
MIDSTATE RADIOLOGY ASSOCIATES, LLC;
MIDSTATE MEDICAL CENTER;
HARTFORD HEALTHCARE CORPORATION : FEBRUARY 16, 2024

CERTIFICATION

I, CHARLES B. PRICE JR, hereby certify that I have made a reasonable inquiry, as permitted by the circumstances, to determine whether there are grounds for a good faith belief that there has been negligence in the care and treatment of MONICA LYNCH. This inquiry has given rise to a good faith belief on my part that grounds exist for an action against MIDSTATE MEDICAL CENTER and/or its servants, agents, apparent agents and/or employees; HARTFORD HEALTHCARE CORPORATION and/or its servants, agents, apparent agents, and/or employees, and MIDSTATE RADIOLOGY ASSOCIATES, LLC., and/or its servants, agents, apparent agents, and/or employees. Pursuant to Connecticut General Statutes § 52-190a, a copy of the redacted and signed opinion of a similar health care provider, as defined in Connecticut General Statutes § 52-184c, is attached to this Complaint as Exhibit A.

FOR THE PLAINTIFF,


BY 
CHARLES B. PRICE
MILLER, ROSNICK, D'AMICO,
AUGUST & BUTLER, P.C.
1087 Broad Street
Bridgeport, CT 06604
Phone: 203-334-0191
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Juris No. 301855

EXHIBIT A

OPINION PURSUANT TO CONNECTICUT GENERAL STATUTES § 52-190A

(NOT SUBJECT TO DISCLOSURE)

I am a registered radiology professional and hold certifications in Diagnostic Imaging, Magnetic Resonance Imaging and Radiology Administration and have been since the time of this incident. I hold a Master's degree in Radiology Science as well. In these capacities, I am familiar with the standards of care that were expected of radiology technologists who assisted in the performance of Computed Tomography (CT) Scans in the United States in March 2022.

I reviewed the following medical records related to Monica Lynch:

- The medical records from Midstate Medical Center, dated March 11, 2022
- The medical record from Hartford Hospital, dated March 11, 2022 – March 21, 2022

Based on my review of these records, it is my opinion that there appears to be evidence of medical negligence on the part of the radiology technologist(s) and any corporate entity that is found to have legal responsibility for their negligence, including but not limited to, Hartford Healthcare, Inc., Midstate Medical Center and employees, and Midstate Radiology Associates LLC, involved in the care and treatment of Monica Lynch on March 11, 2022 in one or more of the following respects:

1. By failing to ensure that Ms. Lynch was safely secured on the CT scanning table at the time she was being evaluated by CT scan following her suspected stroke.
2. By failing to ensure that Ms. Lynch was properly immobilized on the CT scanning table by use of the available Velcro straps on the scanning table.
3. By failing to assess Ms. Lynch fall risk at the time she was brought into the CT scanning room and placed on the scanning table.
4. By failing to follow appropriate safety protocols of Midstate Medical Center with regard to ensuring that patients, such as Ms. Lynch were properly safe-guarded against falling at the time of the performance of CT scans.
5. By failing to follow applicable ARRT Code of Ethics and guidelines regarding patient safety including ARRT Professional Conduct 5 and 7ii: engaged in unprofessional conduct including but not limited to any radiologic technology practice that may create unnecessary danger to a patient's life, health or safety.

The opinions stated herein are based on the information available to me at this time. Should other information and evidence become available, I reserve the right to amend and/or supplement this opinion.

