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September 13, 2001

Beverly A. Harris Mazanec, Raskin & Ryder 100 Franklin's Row 34305 Solon Road Cleveland, Ohio 44139

> Sandra J. Shonk et al, v. Doctors Hospital of Stark County, et al. Case #: 2001CV01895

Dear Ms. Harris:

I have had the opportunity to review the records you have sent me in the case of Shonk et al. v. Doctors Hospital of Stark County et al. This has consisted of the hospital records of Sandra Shonk 7/28/2000 thru 8/2/2000 and an operative note of 3/19/2001 by Dr. Conklin.

Sandra Shonk was admitted to Doctor's Hospital on July 28, 2000 for a tubal ligation by Daniel J. Cain DO. After insertion of the laparoscopic trocar, bleeding was suspected and an immediate search confirmed the presence of a vascular injury. Surgical consultation was sought and resulted in further surgery with repair of vascular structures and the intestine. Tubal ligation was also performed.

Injury to abdominal organs and structures is a well described complication of laparoscopic procedures and not as a result of standard of care. This was recognized by Dr. Cain and he correctly and judiciously converted the procedure and sought surgical consultation. Dr. Cain clearly complied with appropriate standards of care in his recognition of these events and the subsequent treatment of Mrs. Shonk.

If I can be of any further assistance in this matter please do not besitate to call upon me.

Sincerely, mather a plushe all.

Method A. Duchon MD