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HEALTH CARE
ALTERNATIVE DISPUTE
RESOLUTION OFFICE

ELISABETH STEINHOFF 1640 Dinneen Drive McLean, Virginia 22101	*	BEFORE THE
	*	HEALTH CARE
and	*	ALTERNATIVE DISPUTE
HOMER E. STEINHOFF 1640 Dinneen Drive McLean, Virginia 22101	*	RESOLUTION OFFICE
Claimants	*	
v.	*	2009·008
WILLIAM SADLACK, M.D. 6410 Rockledge Drive, Suite 309 Bethesda, Maryland 20817	*	HCA No.
Health Care Provider	*	

* * * * *

STATEMENT OF CLAIM

Claimants, Elisabeth Steinhoff, individually and Elisabeth Steinhoff and Homer E. Steinhoff, as wife and husband, by their attorneys,

, file this Statement of Claim against the Health Care Providers, William Sadlack, M.D., and state:

COUNT I

1. The amount of this claim exceeds $30,000.00.

2. The venue for this claim is proper in the United States District Court for the District of Maryland and may be proper elsewhere.

3. At all times hereinafter set forth, the Health Care Provider, William Sadlack, M.D., held himself out to the Claimant, Elisabeth Steinhoff, and to the general public, as an experienced, competent and able physician possessing or providing that degree and skill and

knowledge which is ordinarily possessed by those who devote special study and attention to the practice of medicine and orthopedic surgery, and as such had a duty to the Plaintiffs to render that degree of care and treatment to Elisabeth Steinhoff which is ordinarily rendered to those who devote special study and attention to the practice of medicine and orthopedics and orthopedic surgery.

4. On January 17, 2006, the Claimant, Elisabeth Steinhoff, reported to Suburban Hospital where she submitted to a left total knee arthroplasty (knee replacement surgery) performed by the Health Care Provider, William Sadlack, M.D.

6. On January 20, 2006, the Claimant was transferred to Adventist Rehabilitation Hospital for rehabilitation and physical therapy where she remained until being discharged on January 25, 2006.

7. Due to continual complaints of pain in her left knee, the Claimant submitted to two additional operative procedures by the Health Care Provider, William Sadlack, M.D., first on February 24, 2006 at Sibley Memorial Hospital and second on April 6, 2006 at Suburban Hospital.

8. After the third operative procedure by by the Health Care Provider, William Sadlack, M.D., the Claimant continued to experience left knee pain and swelling. Claimant ultimately come under the care of Marc Hungerford, M.D., who after examination and testing of the Claimant's left knee performed a total left knee replacement procedure on May 7, 2007.

9. The Health Care Provider, William Sadlack, M.D.,was negligent in that he:

(a) failed to perform the left total knee arthroplasty in compliance with the standards of care;

(b) failed to properly place the prosthesis in the left knee and failed to recognize the improper placement of the prosthesis;

(c) improperly aligned the prosthesis in the left knee;

(d) and was otherwise negligent, careless and reckless.

10. As a direct result of the negligence of the Health Care Provider, William Sadlack, M.D., the Claimant, Elisabeth Steinhoff, has been caused to suffer painful and permanent injuries to her body and was caused to sustain severe mental anguish and emotional pain and suffering, whereby she was and in the future will be prevented from engaging in her usual duties, and activities and was caused to incur and will in the future incur hospital and medical expenses and was caused to incur and will incur in the future financial losses and damages and will continue to experience said mental anguish, pain and suffering in the future.

11. All of the losses, damages and injuries sustained by the Claimant were caused by the carelessness, recklessness and negligence of the Health Care Provider without any negligence on the part of the Claimant contributing thereto.

WHEREFORE, the Claimant, Elisabeth Steinhoff, claims damages against the Health Care Provider, William Sadlack, M.D., in an amount to be determined by a Health Care Alternative Dispute Resolution Panel.

COUNT II

12. Claimants, Elisabeth Steinhoff and Homer E. Steinhoff, as wife and husband incorporate paragraphs 1 through 11of Statement of Claim as if they were set forth at length herein.

13. At all relevant times the Claimants, Elisabeth Steinhoff and Homer E. Steinhoff, were and still are wife and husband .

14. As a result of the negligence described above, the Claimants suffered a loss of services and consortium and interference and energy to their marital relationship.

15. The Claimants say that all the damages, losses and injuries resulted directly from the negligence described above, without any negligence on part of the Claimants thereunto contributing.

WHEREFORE, the Claimants, Elisabeth Steinhoff and Homer E. Steinhoff, as wife and husband, claim damages against the Health Care Provider,William Sadlack, M.D., in an amount to be determined by a Health Care Alternative Dispute Resolution Panel.