

VIRGINIA:

IN THE CIRCUIT COURT OF THE CITY OF CHESAPEAKE

**TERRIKA ABRAM, JENNIFER ACERO,)
KAYLA ADAMS, TABATHA ADAMS,)
TAKILA ADAMS, DENITA ADAMS-)
JORDAN, CAROLINE ADAMSKI,)
PATRICIA AHART, KELCY ALBRECHT,)
JUANITA ALFORD, MICHELLE ALLEN,)
TANISHA AMOS, PATSY ARMISTEAD,)
ANNETTA ASKEW, JULIE ATKINS,)
THEA AVERY, JAQUAY BAILEY,)
JOHNELL BAILS, CHRISTINA BAKER)
SINKS, SARA BAKER, ASHLEY BANKS,)
DEBORAH BARNES, LATASHA)
BATTLE, TAKEALA BAZEMORE,)
DEMETRIA BEAMON, MYESHA)
BELLAMY, DASHIA BENNETT, EBONY)
BENTON, ERICA BENTON, SHAUNA)
BENTON, ASHLEY BERAUD-FRAZIER,)
CYNTHIA BLACK, PRECIOUS)
BLACKMON, AMANDA BLAKE,)
JAMEQUA BLOW, SHEILA BLOW,)
DOROTHY BOONE, CHRISTINE BORG,)
CHRISTINA BOWNE, DIANE BOYD,)
LINDA BOYD, KARLA BRADLEY,)
MARGARET BRANDTNER, AMY)
BRAZIEL, DARLENE BREMBY, TASH)
BREWER, CYNTHIA BRICKER, NANCY)
BRINKLEY, BRITTNEY BROWN, DANA)
BROWN, ERICA BROWN, GEREKA)
BROWN, JERRI BROWN, MELISSA)
BROWN, NIKITA BROWN, NIKITA N.)
BROWN, SAUNDRA BROWN, TESHYA)
BROWN, UNITA BROWN, TAMMY)
BRUAN, BRIANNA BRYANT, CHRISTON)
BRYANT, DWAYNE BRYANT, ISAIAH)
BRYANT, RHONDA BRYANT,)
SHAQUALA BURDEN, KIMBERLY)
BURRISS, ASHLEE BUTLER, BRITTANY)
CANTY, MEGAN CAREW, ROLELIAN)
CARLISLE, ALISIA CARTER, KATRINA)
CARTER, LISA CARTER, NACHET)
CARTER, BRENDA CARTWRIGHT,)
APRIL CASON, DONNA CASPER, LINDA)
CASTLE, MIGDALIA CASTRO,)**

Case No.: _____

JENNIFER CECIL, ROBIN CERDA,)
APRIL CHERRY, JOVANDA CHERRY,)
SHANELL CHERRY, ANTOINETTE)
CHISHOLM; NATASHA CITIZEN,)
CIARA CLARK, DOMINIQUE CLARK,)
PATRICIA CLARKE, CHELSEA)
CLEMONS, PHILLISSIA CLINTON,)
JENNIFER CLIFTON, SHERRIE COBB,)
RONNESHIA COCHRANE, FLOLEPHIE)
COLDEN, JAKYRA COLEMAN,)
CHERISE X . CONLEY, SHARONDA)
COOK, CYNTHIA COOPER, DOROTHY)
COOPER, TAKIEA COOPER, SHAKETA)
COOPER, VERLENA COOPER, TONYA)
CORBETT, BELINDA CORPREW,)
HERMINIA CORRALES, KEYSHA)
COTTON, FRANCESCA COVIL, KARRIE)
COX, PATRICIA CRADLE, GRACE)
CRIBBS, KATELYN CROTTS,)
KATHRYN CUMMINGS, MONICA)
CURTIN, DANIELLE DANCY, TELISA)
DANIEL, KIM DAVIS, MONTOYA)
DAVIS, REGINA DAVIS, SHANETRA)
DAVIS, TONYA DAVIS, LAKEISHA)
DAWSEY, LAKESHA DAWSON,)
CATHLEEN DE FOOR, CRISTAL DEAL,)
ANGEL DEANS, ARMECY DEBERRY,)
YAMANITA DELBRIDGE, TREVIS)
DELOATCH, ANGELA DENNIS,)
MONECIA DENNIS, MONA)
DICKERSON, DIANA DIXON, LAHOMA)
DIXON, CYNTHIA DONALDSON,)
JANAYE DOUGHTY, LAKEITHA)
DRAKE, LISA DRUMMOND, SHIELA)
DUKE, CARRIE DUVALLE, RAMONA)
EATON, SHAUNTA EDWARDS,)
DARRIE'L ELLIOT, LAKISHA)
ELLIOTT, SANDRA ELLIOTT, NADINE)
C. ENGEN, KERRY ERVIN, CECILIA)
ESPINOSA, STEPHANIA EURE,)
DESIREE EVANS, MALLORY EVANS,)
CAROLYNN FACENDA, MISSY)
FARMER, MARTI FASICK,)
ANTOINETTE FAULCON, MARIE)
FREDERICK, LATRENA FIELDS-)
BROTHERS, DANIELLE FISHER,)

LOURDES L. FLETCHER, ERIKA)
FREELAND, MELISSA FULL, ANITA)
FULLER, EBONI FUTRELL, KARA)
GAINNEY, CHRISTINE GARRISON,)
BRITTNEY GARY, SHANDER GARY,)
JERI GATEWOOD, TAMARA GATLING,)
SHERYL GEE, NETISHA GEORGE,)
DONNA GIDDENS, KAITLIN GILBERT,)
TANGELA GILCHRIST, BRANDY)
GILLIAM, SHAMIKA GOLDMAN,)
LEKIA GOODMAN, APRIL GOODWIN,)
CARESSA GRAHAM, SHANNA)
GRANGER, HANNAH GRANT, ADA)
GRAY, OLIVIA GRAY, ROSALIN)
GREEN, SAMANTHA GREEN,)
SHAREIDA GREEN, CHIQUIE)
GREGORY, DOMINIQUE GREGORY,)
TANISHA GRIFFIN, CHERRIE)
HAIRSTON, CHAMEKAY HALL,)
GINGER HALL, JACALA HALL,)
LATANYA HAMLIN, TAMIKA)
HAMRAZ, CRYSTAL HARDY, KEISHA)
HARDY, TAMARA HARDY, ASHLEY)
HARRIS, CHARLETHIA HARRIS,)
JACKIE HARRIS, JONICIA HARRIS,)
KEOSHA HARRIS, NAKEISHA HARRIS,)
PATRICIA HARRIS, VALERIE HARRIS,)
AMBER HARTWIG, LATASHA HAY,)
MEGAN HECKER, QUANIKA)
HENDERSON, MARY HILL, SONYA)
HILL, KIM HINES, TOLETA HINES,)
ARKAYLA HINTON, TONIYA HOFLE,)
JAQUISHA HOLLEY, BRENDA)
HOLLOWAY, DRACENA HOLLOWAY,)
SHIELA HOLLOWAY, TIFFANY)
HOLLOWAY, KIMBERLY HOLMES,)
TANIKA HOLMES, KENYA HORTON,)
KATRINA HOUSE, ANDREA HOUSTON,)
STEPHANIE HOUSTON, SHANELL)
HOWARD, ANTONIETTE HOWELL,)
VICTORIA HOWELL, CONCHITA)
HOYETT, AMANDA HUERTA,)
SHANELL HUGHES, CHELSEY HUNT,)
JACQUELINE S. HURDLE, TONIA)
HURDLE, ASHLEY HURST, VIRGINIA)
HURST, TANISHA HYMAN, TALENA)

HYMONS, JEANNE JACKSON, LINDA)
JACKSON, SHAUNTERETTE JACKSON,)
BELINDA JAMES, MARY JAMES,)
LESLIE JEFFERSON, JACYNTHIA)
JENKINS, LAFESHA JOHNS, KIERRA)
JOHNSON, LATOYA JOHNSON,)
TABITHA JOHNSON, ASHLEY JONES,)
CHRISTINE JONES, DINAH JONES,)
LINDA JONES, SHARNETTE JORDAN,)
TAMBRA JORDON, LATVAUIA)
JOYNER, CARLA JUSTICE, LAURIE)
KASCEK, CASSANDRA KAWALSINGH,)
ELIZABETH KELLOGG, BRITTANY)
KELLY, SHANTE KINDRED, SHELLEY)
M. KOEHL, ANGEL LAND, TEMEKA)
LANGSTON, NATALIE LAWRENCE,)
REBECCA LAWSON, SHANNON)
LEAHY, FRANCES JUANITA LEE,)
KENESHA LEE, CHARLENE)
LEIBRAND, CAROL LEWIS, NIA)
LISSIMORE, NANCY LITTLE, AMBER)
LOCKLEAR, JEANNETTE LOGAN,)
BRENDA LONG, TACORRA LONG,)
NICOLE LUCKETT, ZIGNIA LUGO,)
CELES LYNCH, CINDY LYTLE,)
BRANDY MAAS, BETH MACPHERSON,)
TYLIA MADISON, ANGIE MANLEY,)
SHEENA MANNING, ASHLEY)
MARCOTTE, BIANCA MARKS, JENNY)
MARKS, JENNIFER MARTELL,)
DIAMOND MARTIN, JACQUELINE)
MARTIN, SHAKENA MATHEWS,)
LENORE MATHIS, SHANDA MATHIS,)
LAMONICA MAYO, KEONA MCCALL,)
KATHLEEN MCDONALD, TAYNA)
MCINNIS, YOLANDA MCKENZIE,)
SONYA MEDLIN, ERICA MERCER,)
TRACI MILBURN, MELISSA MILDRUM,)
BETTYE MILES, JESSICA MILLER,)
KATRINA MITCHELL, BIANCA MOISE,)
JULIZA MOODY, SIGRID MOORE,)
ALEXIS MOORES, EBONY MORGAN,)
MARY MORROW, NANCY)
MOSTELLER, LAMEKA MULL, NIKI)
MURRY, APRIL NEVILLE, MARY)
NICHOLS, COURTNEY NIPPER,)

LANADIA NORA, VANETTE)
NORFLEET, JAZMINE NORMAN,)
LILLIAN NORMAN, GEORGIA)
OBENAU, MEGHAN OBRIEN, BIANCA)
ODOM, BRITTANY ODOM, CHARITA)
PARKER, SHYLISLE PATTERSON,)
JIMMELL PEELE, PAULA KAY PERRY,)
LATRICE PIERCE, TIFFANY PIERRE,)
LUCINIA PLUMMER, YVETTE)
POWELL, DEANNA POWERS, WENDY)
PRITCHARD, TRINA QUINONES,)
KIMBERLY RAGER, NORA RAPADA,)
PORSHA READY, JACKIE RECTOR,)
ERICA REED, KESHIRA REED,)
KIYANIA REESE, LATEISHA REESE,)
MONIQUE REESE, DENISE REID,)
ERICA REID, PATRICIA RENFROW,)
CEIRA REYNOLDS, FAJIER RHODES,)
PAMELA RHODES, ASIA RICHARDS,)
CHRISTY RIDDICK, SHERRY RIDDICK,)
JOI RIVERA, SADE RIVERA,)
SHARONDA ROBINSON, VONTRESE)
RODGERS, SANDREA ROWE, SUMMER)
RUFF, MAISHA RUMBLE, JANELLE)
SABIR, JESSICA SAGE, MELISSA)
SALYERS, GIA SAMS, DEBRA)
SATTEWHITE, NADASHA)
SATTEWHITE, WADIYA SAUNDERS,)
CRYSTAL SCARBOROUGH, CHANTA)
SCOTT, CHEVONDA SCOTT, DENISE)
SCOTT, DIANA SCOTT, KIANA SCOTT,)
LESLIE SCOTT, SANESIA SCOTT,)
TANIKA SCOTT, TASHANDA SCOTT,)
SHREYA SHAH, KATHLEEN SHAPLEY,)
CRYSTAL SHARPE, LISA MOUNIE)
SHELBURNE, BONITA SHERRELL,)
PORTIA SHERRIS, QUEEN SHERROD,)
SUMMERS SHULL, BRITTANY)
SIMMONS, TACARA SKEETER,)
RAMONA SLAYTON, JESSICA SMITH,)
KIMBERLY SMITH, SANDRA SMITH,)
SEQUOIA SMITH, SHIELA SMITH,)
AIMEE SPARLING, YOLANDA)
SPEIGHT, ANGEL SPELLER,)
TAWANDA SPELLER, KAYLA SPENCE,)
STACEY SPIRES, WANDA STALLINGS,)

KATRINA STALLINS, TINA STARKS,)
JENNIFER STARR, SAMIRA STEPHENS,)
CARMEN STEPHENSON MITCHELL,)
ARIKA STEVENS, APRIL STOKES,)
KIKIA STOKES, CHANNING)
STUDWELL, PARCENETTE TAN,)
SHANNON TAPSCOTT, GABRIELLE)
TAYLOR, KRYSTAL TAYLOR,)
MADISON TAYLOR, TIFFANY)
TAYLOR, BRITTNEY TEMPLE, JELISA)
TERRY, QUANA TERRY, APRIL)
THOMAS, LESLIE THOMAS HARRIS,)
MICHELE THOMPSON, TRE'ELLE)
TOLBERT, ASHLEY TROTTER,)
JIVONDA TUCKER, PATSY TUCKER,)
NICOLE TURNER, HOLLY TUTE, TINA)
TWINE, CHANDRA TYSON, HEATHER)
UMBERGER, ROSALYN VALENTINE,)
ANNIE VANTHUL, CHRISTIAN)
VAUGHAN, JANETTA VAUGHAN,)
VERONICA VAUGHAN, BARBARA)
VAZQUEZ, STEPHANIE VILLAREAL,)
TANIKA VINCENT, LUCIA VINCIA,)
TONYA VINSON-HAINSWORTH,)
TARQUASHIA WADDLER, ANN)
WALKER, ASHLEY WALKER, CHRISTY)
WALKER, MICHELLE WALKER,)
TAMESHA WALKER, BRIDGET WARD,)
CATHY WARD, DIERDRA WARD,)
KAREN WARREN, LAURA WARREN,)
LINDA WARREN, SHEMEKA WARREN,)
CHERYL WASHINGTON, TAMMY)
WASHINGTON, TAMIKA WESCOTT,)
BIANCA WEST, EBONI WEST, SHERRI)
WHEELER, VICKIE WHIDBEE, CATHY)
WHITAKER, MARY LOU WHITAKER,)
LAQUISHA WHITE, LYNETTE WHITE,)
REYLEA WHITE, WILMA WHITE,)
ASHANTI WHITFIELD, LAKESHA)
WHITING, TIFFANY WHITNEY,)
DU'WAYLA WIGGINS, SARANISE)
WILDER, JAN WILKINS, PEGGY)
WILKINS, TYRINA WILKINS, ANGELA)
WILLIAMS, CHESSIE WILLIAMS,)
CYNTHIA WILLIAMS, DONNA)
WILLIAMS, KENITRA WILLIAMS,)

**KEONA WILLIAMS, LA'TOYA
WILLIAMS, LUQUEEN WILLIAMS,
NEVA WILLIAMS, REBECCA
WILLIAMS, SONYA WILLIAMS,
TAMIKA WILLIAMS, YOVONE
WILLIAMS, ANGELA WILSON,
ANNETTE WILSON, ERETTA WILSON,
JENNIFER WILSON, LATOYA WILSON,
MICHELLE WILSON, TOYNESIA
WILSON, FREDRIKA WINBORNE, KIM
WINT, ARLENE WOOD, MADYSON
WOODS, MARIAH WOODS, DAWN
WORELLS, CRYSTAL WORRELL,
DANA WORTHINGTON, KIMBERLY W.
WRIGHT, TONYA WRIGHT, RACHEL
ZUDERVEEN**

Plaintiffs,

v.

**CHESAPEAKE HOSPITAL AUTHORITY)
d/b/a CHESAPEAKE REGIONAL)
HEALTHCARE d/b/a CHESAPEAKE)
GENERAL HOSPITAL d/b/a)
CHESAPEAKE REGIONAL MEDICAL)
CENTER)**

Serve:

James Reese Jackson, CEO)
736 Battlefield Boulevard North)
Chesapeake, Virginia 23320)

and

JAMES REESE JACKSON,)

Serve:

1341 Baffly Loop)
Chesapeake, Virginia 23320)

and

PETER FRANCIS BASTONE,)

Serve:

27665 Chapala)
Mission Viejo, California 92692)

and

WYNN LAWTON DIXON JR.,

Serve:

604 Reardon Court

Chesapeake, Virginia 23322

and

DONALD S. BUCKLEY

Serve:

1408 Cobble Scott Way

Chesapeake, VA 23322

and

CHRISTOPHER R. MOSLEY

Serve:

1366 Simon Drive

Chesapeake, VA 23320

Defendants.

COMPLAINT

Plaintiffs, by counsel, move for judgment against Defendant Chesapeake Hospital Authority, d/b/a Chesapeake Regional Healthcare, d/b/a Chesapeake General Hospital, d/b/a Chesapeake Regional Medical Center (“CRMC”); Defendant James Reese Jackson (“Jackson”); Defendant Peter Bastone (“Bastone”); Defendant Wynn Dixon (“Dixon”); Defendant Donald S. Buckley (“Buckley”) and Defendant Christopher R. Mosley (“Mosley”) on the grounds and in the amount set forth as follows:

1. Plaintiffs bring this civil action against Defendants for enabling former physician Javaid Perwaiz to perform unnecessary, uninformed, harmful, invasive, unlawful, and life-altering gynecologic medical procedures on them and other women, for nearly a decade, at Chesapeake

Regional Medical Center, despite repeated reports and clear evidence of Perwaiz's prior misconduct in his obstetrics and gynecology practice.

2. The procedures that Perwaiz performed on Plaintiffs included irreversible hysterectomies and other medically unnecessary surgeries.

3. This action is filed pursuant to The Multiple Claimant Litigation Act, Va. Code § 8.01-267.1, *et seq.*

4. Plaintiffs total more than six individuals joined herein as Plaintiffs in a single action.

5. Plaintiffs' claims involve common issues of law and fact and arise out of the same series of transactions or occurrences, and their claims are properly joined in accordance with Va. Code § 8.01-267.1, *et seq.* The common questions of law or fact predominate and are significant to the actions.

6. Joinder of all Plaintiffs' claims against Defendant(s) herein (i) promotes the ends of justice and the just and efficient conduct and disposition of the actions; (ii) is consistent with each party's right to due process of law; and (iii) does not prejudice any individual party's right to a fair and impartial resolution of each action.

7. Joinder of all Plaintiffs' claims against Defendant(s) herein will be more convenient for the parties, witnesses, and counsel than individual separate actions.

8. All Plaintiffs' claims are at the initial stage of litigation, and joinder of their claims more efficiently utilizes judicial facilities and personnel and the Court's calendar, and avoids inconsistent rulings, orders, and judgments.

9. Joinder of all Plaintiffs' claims against Defendants makes prompt settlement of the actions more likely and will not result in prejudice or confusion.

PARTIES

10. Plaintiff, Terrika Abram, born February 12, 1983, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

11. Plaintiff, Jennifer Acero, born July 19, 1982, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

12. Plaintiff, Denita Adams-Jordan, born May 12, 1984, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

13. Plaintiff, Kayla Adams, born November 12, 1992, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

14. Plaintiff, Tabatha Adams, born May 9, 1984, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

15. Plaintiff, Takila Adams, born January 25, 1979, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

16. Plaintiff, Caroline Adamski, born November 16, 1965, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

17. Plaintiff, Patricia Ahart, born January 22, 1970, is a citizen of the State of North Carolina, residing in Roper, North Carolina.

18. Plaintiff, Kelcy Albrecht, born February 26, 1992, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

19. Plaintiff, Juanita Alford, born February 13, 1971, is a citizen of the State of Missouri, residing in Republican, Missouri.

20. Plaintiff, Michelle Allen, born June 28, 1969, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

21. Plaintiff, Tanisha Amos, born September 24, 1974, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

22. Plaintiff, Patsy Armistead, born May 23, 1959, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

23. Plaintiff, Annette Askew, born November 25, 1961, is a citizen of the State of Virginia, residing Portsmouth, Virginia.

24. Plaintiff, Julie Atkins, born November 26, 1984, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

25. Plaintiff, Thea Avery, born June 26, 1993, is a citizen of the State of Ohio, residing in Canal Winchester, Ohio.

26. Plaintiff, Jaquay Bailey, born December 1, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

27. Plaintiff, Johnell Bails, born February 1, 1974, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

28. Plaintiff, Sara Baker, born February 17, 1995, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

29. Plaintiff, Ashley Banks, born May 20, 1993, is a citizen of the State of Virginia, residing in Williamsburg, Virginia.

30. Plaintiff, Deborah Barnes, born September 29, 1979, is a citizen of the State of Louisiana, residing in Kenner, Louisiana.

31. Plaintiff, Latasha Battle, born October 20, 1981, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

32. Plaintiff, Takeala Bazemore, born August 5, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

33. Plaintiff, Demetria Beamon, born March 9, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

34. Plaintiff, Myesha Bellamy, born October 7, 1981, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

35. Plaintiff, Dashia Bennett, born July 12, 1984, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

36. Plaintiff, Ebony Benton, born November 30, 1982, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

37. Plaintiff, Erica Benton, born October 25, 1984, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

38. Plaintiff, Shauna Benton, born November 14, 1973, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

39. Plaintiff, Ashley Beraud-Frazier, born December 19, 1983, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

40. Plaintiff, Cynthia Black, born December 11, 1953, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

41. Plaintiff, Precious Blackmon, born September 22, 1987, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

42. Plaintiff, Amanda Blake, born November 6, 1967, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

43. Plaintiff, Jamequa Blow, born June 25, 1995, is a citizen of the State of Virginia, residing in Courtland, Virginia.

44. Plaintiff, Sheila Blow, born September 16, 1984, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

45. Plaintiff, Dorothy Boone, born September 22, 1963, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

46. Plaintiff, Christine Borg, born July 27, 1966, is a citizen of the State of North Carolina, residing in Hertford, North Carolina.

47. Plaintiff, Christina Bowne, born April 20, 1970, is a citizen of the State of Virginia, residing in Crewe, Virginia.

48. Plaintiff, Diane Boyd, born February 17, 1986, is a citizen of the State of Virginia, residing in Chesapeake Virginia.

49. Plaintiff, Linda Boyd, born November 6, 1961, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

50. Plaintiff, Karla Bradley, born June 14, 1977, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

51. Plaintiff, Margaret Brandtner, born August 07, 1962, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

52. Plaintiff, Amy Braziel, born May 3, 1976, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

53. Plaintiff, Darlene Bremby, born March 6, 1957, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

54. Plaintiff, Tasha Brewer, born July 26, 1980, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

55. Plaintiff, Cynthia Bricker, born October 16, 1960, is a citizen of the State of Virginia, residing in Smithfield, Virginia.

56. Plaintiff, Nancy Brinkley, born August 1, 1965, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

57. Plaintiff, Brittney Brown, born December 24, 1990, is a citizen of the State of North Carolina, residing in Elizabeth City, North Carolina.

58. Plaintiff, Dana Brown, born July 12, 1987, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

59. Plaintiff, Erica Brown, born December 23, 1992, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

60. Plaintiff, Gereka Brown, born July 1, 1978, is a citizen of the State of Pennsylvania, residing in Philadelphia, Pennsylvania.

61. Plaintiff, Jerri Brown, born May 3, 2021, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

62. Plaintiff, Melissa Brown, born September 28, 1976, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

63. Plaintiff, Nikita Brown, born February 7, 1986, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

64. Plaintiff, Nikita N. Brown, born May 8, 1986, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

65. Plaintiff, Sandra Brown, born June 10, 1989, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

66. Plaintiff, Teshya Brown, born December 2, 1997, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

67. Plaintiff, Unita Brown, born September 1, 1969, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

68. Plaintiff, Tammy Bruan, born March 1, 1969, is a citizen of the State of North Carolina, residing in Shawboro, North Carolina.

69. Plaintiff, Brianna Bryant, born November 27, 1993, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

70. Plaintiff Christon Bryant, born October 14, 2006, is a citizen of the State of Virginia residing in Portsmouth, Virginia.

71. Plaintiff Dwayne Bryant, born December 8, 2009, is a citizen of the State of Virginia residing in Portsmouth, Virginia.

72. Plaintiff Isaiah Bryant, born December 6, 2008, is a citizen of the State of Virginia residing in Portsmouth, Virginia.

73. Plaintiff, Rhonda Bryant, born May 22, 1985, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

74. Plaintiff, Shaquala Burden, born June 26, 1991, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

75. Plaintiff, Kimberly Burriss, born February 28, 1981, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

76. Plaintiff, Ashlee Butler, born September 15, 1989, is a citizen of the State of Virginia, residing in Chesapeake Virginia.

77. Plaintiff, Brittany Canty, born April 1, 1994, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

78. Plaintiff, Megan Carew, born November 14, 1983, is a citizen of the State of North Carolina, residing in Elizabeth City, North Carolina.

79. Plaintiff, Rolelian Carlisle, born January 8, 1968, is a citizen of the State of Virginia, residing in Carrollton, Virginia.

80. Plaintiff, Alisia Carter, born July 21, 1987, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

81. Plaintiff, Katrina Carter, born November 2, 1974, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

82. Plaintiff, Lisa Carter, born February 23, 1967, is a citizen of the State of Virginia, residing in Newport News, Virginia.

83. Plaintiff, Nacet Carter, born March 31, 1980, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

84. Plaintiff, Brenda Cartwright, born June 7, 1963, is a citizen of the State of North Carolina, residing in Elizabeth City, North Carolina.

85. Plaintiff, April Cason, born April 24, 1987, is a citizen of the State of North Carolina, residing in Knotts Island, North Carolina.

86. Plaintiff, Donna Casper, born September 6, 1964, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

87. Plaintiff, Linda Castle, born July 7, 1963, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

88. Plaintiff, Migdalia Castro, born October 25, 1972, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

89. Plaintiff, Jennifer Cecil, born September 27, 1979, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

90. Plaintiff, Robin Cerda, born October 17, 1964, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

91. Plaintiff, April Cherry, born July 8, 1981, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

92. Plaintiff, Jovanda Cherry, born September 14, 1979, is a citizen of the State of Virginia, residing in Chesapeake Virginia.

93. Plaintiff, Shanell Cherry, born November 6, 1986, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

94. Plaintiff, Antoinette Chisholm, born April 16, 1978, is a citizen of the State of Virginia, residing in Chesapeake Virginia.

95. Plaintiff, Natasha Citizen, born September 17, 1975, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

96. Plaintiff, Ciara Clark, born February 1, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

97. Plaintiff, Dominique Clark, born January 8, 1987, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

98. Plaintiff, Patricia Clarke, born August 14, 1966, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

99. Plaintiff, Chelsea Clemons, born January 17, 1992, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

100. Plaintiff, Phillissia Clinton, born November 7, 1959, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

101. Plaintiff, Jennifer Clifton, born June 22, 1978, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

102. Plaintiff, Sherrie Cobb, born October 17, 1986, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

103. Plaintiff, Ronnesha Cochrane, born June 2, 1991, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

104. Plaintiff, Flolephia Colden, born September 19, 1981, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

105. Plaintiff, Jakyra Coleman, born August 5, 1999, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

106. Plaintiff, Cherise Conley, born March 21, 1965, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

107. Plaintiff, Sharonda Cook, born March 24, 1993, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

108. Plaintiff, Cynthia Cooper, born May 5, 1969, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

109. Plaintiff, Dorothy Cooper, born January 9, 1978, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

110. Plaintiff, Shaketa Cooper, born January 20, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

111. Plaintiff, Takiea Cooper, born February 12, 1986, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

112. Plaintiff, Verlena Cooper, born April 7, 1984, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

113. Plaintiff, Tonya Corbett, born June 4, 1983, is a citizen of the State of Virginia, residing in Richmond, Virginia.

114. Plaintiff, Belinda Corprew, born July 14, 1981, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

115. Plaintiff, Herminia Corrales, born November 11, 1963, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

116. Plaintiff, Keysha Cotton, born March 15, 1991, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

117. Plaintiff, Francesca Covil, born June 10, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

118. Plaintiff, Karrie Cox, born November 7, 1997, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

119. Plaintiff, Patricia Cradle, born January 26, 1957, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

120. Plaintiff, Grace Cribbs, born May 26, 1969, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

121. Plaintiff, Katelyn Crotts, born September 22, 1992, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

122. Plaintiff, Kathryn Cummings, born August 7, 1995, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

123. Plaintiff, Monica Curtin, born September 11, 1962, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

124. Plaintiff, Danielle Dancy, born April 28, 1993, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

125. Plaintiff, Talisa Daniel, born January 2, 1975, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

126. Plaintiff, Kim Davis, born August 15, 1967, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

127. Plaintiff, Montoya Davis, born January 03, 1983, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

128. Plaintiff, Regina Davis, born July 22, 1989, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

129. Plaintiff, Shanetra Davis, born December 3, 1982, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

130. Plaintiff, Tonya Davis, born December 20, 1976, is a citizen of the State of Virginia, residing in Virginia Beach.

131. Plaintiff, Lakeisha Dawsey, born September 2, 1976, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

132. Plaintiff, Lekesha Dawson, born December 6, 1978, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

133. Plaintiff, Cathleen De Foor, born December 16, 1957, is a citizen of the State of Virginia, residing in Mt Sidney, Virginia.

134. Plaintiff, Christal Deal, born September 15, 1969, is a citizen of the State of North Carolina, residing in Gatesville, North Carolina.

135. Plaintiff, Angel Deans, born April 28, 1980, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

136. Plaintiff, Armecy Deberry, born April 30, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

137. Plaintiff, Yamanita Delbridge, born May 13, 1980, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

138. Plaintiff, Trevis Deloatch, born May 16, 1977, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

139. Plaintiff, Angela Dennis, born March 5, 1976, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

140. Plaintiff, Monecia Dennis, born May 10, 1991, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

141. Plaintiff, Mona Dickerson, born January 13, 1993, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

142. Plaintiff, Diana Dixon, born April 17, 1963, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

143. Plaintiff, Lahoma Dixon, born April 26, 1968, is a citizen of the State of Virginia, residing in Susan, Virginia.

144. Plaintiff, Cynthia Donaldson, born April 23, 1961, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

145. Plaintiff, Janaye Doughty, born December 05, 1989, is a citizen of the State of Virginia, residing in Newport News, Virginia.

146. Plaintiff, Lakeitha Drake, born November 8, 1976, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

147. Plaintiff, Lisa Drummond, born March 30, 1980, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

148. Plaintiff, Sheila Duke, born August 10, 1955, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

149. Plaintiff, Carrie DuVall, born July 23, 1972, is a citizen of the State of Virginia, residing in Chesapeake Virginia.

150. Plaintiff, Ramona Eaton, born September 30, 1969, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

151. Plaintiff, Shaunta Edwards, born June 20, 1975, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

152. Plaintiff, Darrie'l Elliot, born October 9, 1993, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

153. Plaintiff, Lakishia Elliott, born September 24, 1974, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

154. Plaintiff, Sandra Elliott, born July 26, 1983, is a citizen of the State of Virginia, residing in Chesapeake Virginia.

155. Plaintiff, Nadine C Engen, born June 27, 1963, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

156. Plaintiff, Kerry Ervin, born November 17, 1983, is a citizen of the State of NC, residing in Clayton, NC.

157. Plaintiff, Cecilia Espinoza, born November 24, 1989, is a citizen of the State of Virginia, residing in Chesapeake Virginia.

158. Plaintiff, Stephania Eure, born October 2, 1974, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

159. Plaintiff, Desiree Evans, born March 4, 1996, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

160. Plaintiff, Mallory Evans, born August 11, 1987, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

161. Plaintiff,Carolynn Facenda, born July 26, 1988, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

162. Plaintiff, Missy Farmer, born April 27, 1963, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

163. Plaintiff, Marti Fasick, born September 26, 1985, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

164. Plaintiff, Antionette Faulcon, born April 24, 1971, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

165. Plaintiff, LaTrena Fields-Brothers, born June 01, 1977, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

166. Plaintiff, Danielle Fisher, born January 29, 1995, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

167. Plaintiff, Lourdes L Fletcher, born September, 19, 2025, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

168. Plaintiff, Marie Frederick, born March 22, 1980, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

169. Plaintiff, Erika Freeland, born January 11, 1972, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

170. Plaintiff, Melissa Full, born May 20, 1986, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

171. Plaintiff, Anita Fuller, born October 27, 1957, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

172. Plaintiff, Eboni Futrell, born September 5, 1989, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

173. Plaintiff, Kara Gainey, born November 29, 1987, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

174. Plaintiff, Christine Garrison, born November 17, 1988, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

175. Plaintiff, Brittney Gary, born September 29, 1992, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

176. Plaintiff, Shander Gary, born May 19, 1971, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

177. Plaintiff, Jerri Gatewood, born March 2, 1964, is a citizen of the State of Virginia, residing in Evington, Virginia.

178. Plaintiff, Tamara Gatling, born March 5, 1986, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

179. Plaintiff, Sheryl Gee, born November 14, 1967, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

180. Plaintiff, Netisha George, born December 22, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

181. Plaintiff, Donna Giddens, born June 1, 1962, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

182. Plaintiff, Kaitlin Gilbert, born January 6, 1995, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

183. Plaintiff, Tangela Gilchrist, born April 7, 1971, is a citizen of the State of Maryland, residing in Bowie, Maryland.

184. Plaintiff, Brandy Gilliam, born March 31, 1979, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

185. Plaintiff, Shamika Goldman, born February 4, 1991, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

186. Plaintiff, Lekia Goodman, born October 10, 1978, is a citizen of the State of Virginia, residing in Waynesboro, Virginia.

187. Plaintiff, April Goodwin, born April 25, 1970, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

188. Plaintiff, Caressa Graham, born December 25, 1976, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

189. Plaintiff, Shanna Granger, born September 01, 1983, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

190. Plaintiff, Hannah Grant, born June 21, 1995, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

191. Plaintiff, Ada Gray, born April 1, 1968, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

192. Plaintiff, Olivia Gray, born March 6, 1996, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

193. Plaintiff, Rosalin Green, born September 5, 1966, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

194. Plaintiff, Samantha Green, born January 12, 1989, is a citizen of the State of Virginia, residing in Drewrylife, Virginia.

195. Plaintiff, Shareida Green, born February 12, 1979, is a citizen of the State of Virginia, residing in Newport News, Virginia.

196. Plaintiff, Chiquie Gregory, born August 11, 1961, is a citizen of the State of North Carolina, residing in Elizabeth City, NC.

197. Plaintiff, Dominique Gregory, born October 27, 1985, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

198. Plaintiff, Tanisha Griffin, born April 3, 1982, is a citizen of the State of Virginia, Portsmouth, Virginia.

199. Plaintiff, Cherie Hairston, born September 4, 1988, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

200. Plaintiff, Chamekay Hall, born August 23, 1978, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

201. Plaintiff, Ginger Hall, born November 12, 1970, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

202. Plaintiff, Jacala Hall, born July 1, 1982, is a citizen of the State of ,Virginia residing in Hampton, Virginia.

203. Plaintiff, Latanya Hamlin, born October 21, 1975, is a citizen of the State of North Carolina, residing in Clayton, North Carolina.

204. Plaintiff, Tamika Hamraz, born September 25, 1985, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

205. Plaintiff, Crystal Hardy, born October 25, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

206. Plaintiff, Keisha Hardy, born December 11, 1977, is a citizen of the State of Virginia, residing in Windsor, Virginia.

207. Plaintiff, Tamara Hardy, born May 26, 1999, is a citizen of the State of Virginia, residing in Richmond, Virginia.

208. Plaintiff, Ashley Harris, born February 24, 1988, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

209. Plaintiff, Charlethia Harris, born March 20, 1985, is a citizen of the State of Virginia, Residing in Roanoke, Virginia.

210. Plaintiff, Jacki Harris, born April 2, 1979, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

211. Plaintiff, Jonicia Harris, born November 28, 1999, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

212. Plaintiff, Keosha Harris, born February 16, 1991, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

213. Plaintiff, Nakeisha Harris, born July 27, 1976, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

214. Plaintiff, Patricia Harris, born July 9, 1953, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

215. Plaintiff, Valerie Harris, born April 18, 1970, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

216. Plaintiff, Amber Hartwig, born July 8, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

217. Plaintiff, Latasha Hay, born January 3, 1990, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

218. Plaintiff, Megan Hecker, born December 12, 1987, is a citizen of the State of Virginia, residing in Windsor, Virginia.

219. Plaintiff, Quanika Henderson, born September 14, 1977, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

220. Plaintiff, Mary Hill, born May 23, 1985, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

221. Plaintiff, Sonya Hill, born January 2, 1967, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

222. Plaintiff, Kim Hines, born October 6, 1964, is a citizen of the State of NC, residing in Currituck, NC.

223. Plaintiff, Toletta Hines, born November 23, 1976, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

224. Plaintiff, Arkayla Hinton, born July 5, 1996, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

225. Plaintiff, Toniya Hofler, born June 13, 1998, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

226. Plaintiff, Jaquesha Holley, born December 9, 1985, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

227. Plaintiff, Brenda Holloway, born February 25, 1983, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

228. Plaintiff, Dracena Holloway, born June 30, 1983, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

229. Plaintiff, Sheila Holloway, born January 28, 1959, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

230. Plaintiff, Tiffany Holloway, born March 8, 1980, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

231. Plaintiff, Kimberly Holmes, born January 20, 1977, is a citizen of the State of Virginia, residing in Franklin, Virginia.

232. Plaintiff, Tanika Holmes, born March 16, 1977, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

233. Plaintiff, Kenya Horton, born March 7, 1989, is a citizen of the State of Virginia, residing in Hampton, Virginia.

234. Plaintiff, Katrina House, born July 17, 1996, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

235. Plaintiff, Andrea Houston, born May 22, 1968, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

236. Plaintiff, Stephanie Houston, born October 13, 1964, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

237. Plaintiff, Shanell Howard, born May 18, 1985, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

238. Plaintiff, Antoinette Howell, born November 26, 1978, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

239. Plaintiff, Victoria Howell, born December 1, 1993, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

240. Plaintiff, Conchita Hoyett, born January 24, 1976, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

241. Plaintiff, Amanda Huerta, born November 24, 1981, is a citizen of the State of North Carolina, residing in Edenton, North Carolina.

242. Plaintiff, Shanell Hughes, born December 13, 1982, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

243. Plaintiff, Chelsey Hunt, born July 17, 1992, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

244. Plaintiff, Jacqueline S. Hurdle, born July 18, 1988, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

245. Plaintiff, Tonia Hurdle, born September 27, 1971, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

246. Plaintiff, Ashley Hurst, born October 19, 1987, is a citizen of the State of North Carolina, residing in Shawboro, North Carolina.

247. Plaintiff, Virginia Hurst, born February 23, 1957, is a citizen of the State of Virginia, residing in Chesapeake Virginia.

248. Plaintiff, Tanisha Hyman, born July 10, 1975, is a citizen of the State of Virginia, residing in Hampton, Virginia.

249. Plaintiff, Talena Hymons, born March 29, 1985, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

250. Plaintiff, Jeanne Jackson, born August 20, 1965, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

251. Plaintiff, Linda Jackson, born February 7, 1968, is a citizen of the State of Virginia, residing in Windsor, Virginia.

252. Plaintiff, Shaunterette Jackson, born September 04, 1978, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

253. Plaintiff, Belinda James, born August 24, 1967, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

254. Plaintiff, Mary James, born April 10, 1954, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

255. Plaintiff, Leslie Jefferson, born October 26, 1968, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

256. Plaintiff, JaCynthia Jenkins, born May 31, 1969, is a citizen of the State of Virginia, residing in Portsmouth, Virginia

257. Plaintiff, Kierra Johnson, born September 25, 1991, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

258. Plaintiff, Lafesha Johnson, born October 27, 1988, is a citizen of the State of Virginia, residing in Smithfield, Virginia.

259. Plaintiff, Latoya Johnson, born February 15, 1983, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

260. Plaintiff, Tabitha Johnson, born August 31, 1988, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

261. Plaintiff, Ashley Jones, born April 8, 1989, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

262. Plaintiff, Christine Jones, born January 27, 1965, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

263. Plaintiff, Dinah Jones, born October 29, 1959, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

264. Plaintiff, Linda Jones, born August 20, 1958, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

265. Plaintiff, Sharnette Jordan, born April 23, 1979, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

266. Plaintiff, Tambra Jordan, born June 10, 1976, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

267. Plaintiff, Latvauia Joyner, born March 22, 1982, is a citizen of the State of Virginia, residing in Franklin, Virginia.

268. Plaintiff, Carla Justice, born July 17, 1961, is a citizen of the State of Virginia, residing in Arvonnia, Virginia.

269. Plaintiff, Laurie Kaseck, born March 21, 1963, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

270. Plaintiff, Cassandra Kawalsingh, born January 12, 1992, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

271. Plaintiff, Elizabeth Kellogg, born October 20, 1984, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

272. Plaintiff, Brittany Kelly, born September 16, 1993, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

273. Plaintiff, Shante Kindred, born March 12, 1988, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

274. Plaintiff, Shelley M. Koehl, born November 15, 1976, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

275. Plaintiff, Angel Land, born April 11, 1984, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

276. Plaintiff, Temeka Langston, born February 19, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

277. Plaintiff, Natalie Lawrence, born July 5, 1976, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

278. Plaintiff, Rebecca Lawson, born September 9, 1961, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

279. Plaintiff, Shannon Leahy, born October 8, 1981, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

280. Plaintiff, Frances Juanita Lee, born April 17, 1970, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

281. Plaintiff, Kenesha Lee, born June 19, 1989, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

282. Plaintiff, Charlene Leibrand, born May 6, 1961, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

283. Plaintiff, Carol Lewis, born October 21, 1949, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

284. Plaintiff, Nia Lissimore, born January 16, 1980, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

285. Plaintiff, Nancy Little, born December 4, 1969, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

286. Plaintiff, Amber Locklear, born November 1, 1983, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

287. Plaintiff, Jeannette Logan, born July 30, 1963, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

288. Plaintiff, Brenda Long, born November 10, 1961, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

289. Plaintiff, Tacorra Long, born June 27, 1992, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

290. Plaintiff, Nicole Luckett, born March 22, 1976, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

291. Plaintiff, Zignia Lugo, born November 9, 1968, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

292. Plaintiff, Celes Lynch, born November 10, 1990, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

293. Plaintiff, Cindy Lytle, born September 3, 1975, is a citizen of the State of Virginia, residing in Smithfield, Virginia.

294. Plaintiff, Brandy Maas, born February 4, 1991, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

295. Plaintiff, Beth MacPherson, born July 11, 1977, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

296. Plaintiff, Tylia Madison, born June 2, 2002, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

297. Plaintiff, Angie Manley, born July 12, 1965, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

298. Plaintiff, Sheena Manning, born December 1, 1983, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

299. Plaintiff, Ashley Marcotte, born January 11, 1985, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

300. Plaintiff, Bianca Marks, born February 3, 1995, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

301. Plaintiff, Jenny Marks, born May 23, 1983, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

302. Plaintiff, Jennifer Martell, born May 10, 1978, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

303. Plaintiff, Diamond Martin, born July 5, 1996, is a citizen of the State of Virginia, residing in Newport News, Virginia.

304. Plaintiff, Jacqueline Martin, born May 1, 1974, is a citizen of the State of Virginia, residing in Suffolk Virginia.

305. Plaintiff, Lenore Mathis, born June 19, 1982, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

306. Plaintiff, Shanda Mathis, born February 21, 1984, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

307. Plaintiff, Shakena Matthews, born January 7, 1990, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

308. Plaintiff, Lamonica Mayo, born July 3, 1980, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

309. Plaintiff, Keona McCall, born February 21, 1991, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

310. Plaintiff, Kathleen McDonald, born May 16, 1953, is a citizen of the State of Virginia, residing in Newport News, Virginia.

311. Plaintiff, Tanya McInnis, born August 16, 1975, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

312. Plaintiff, Yolanda McKenzie, born October 2, 1965, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

313. Plaintiff, Sonya Medlin, born November 13, 1942, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

314. Plaintiff, Erica Mercer, born November 21, 1987, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

315. Plaintiff, Traci Milburn, born November 9, 1968, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

316. Plaintiff, Melissa Mildrum, born May 25, 1988, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

317. Plaintiff, Bettye Miles, born December 20, 1983, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

318. Plaintiff, Jessica Miller, born September 17, 1977, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

319. Plaintiff, Carmen Stephenson Mitchell, born June 3, 1977, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

320. Plaintiff, Katrina Mitchell, born October 10, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

321. Plaintiff, Bianca Moise, born May 16, 1989, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

322. Plaintiff, Juliza Moody, born December 25, 1988, is a citizen of the State of Virginia, residing in Newport News Virginia.

323. Plaintiff, Sigrid Moore, born November 29, 1966, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

324. Plaintiff, Alexis Moores, born April 30, 1991, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

325. Plaintiff, Ebony Morgan, born July 14, 1982, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

326. Plaintiff, Mary Morrow, born January 20, 1989, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

327. Plaintiff, Nancy Mosteller, born November 10, 1966, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

328. Plaintiff, Lameka Mull, born May 10, 1982, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

329. Plaintiff, Niki Murry, born July 19, 1986, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

330. Plaintiff, April Neville, born September 30, 1990, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

331. Plaintiff, Mary Nichols, born July 6, 1975, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

332. Plaintiff, Courtney Nipper, born March 4, 1989, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

333. Plaintiff, Lanadia Nora, born January 7, 1998, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

334. Plaintiff, Vanette Norfleet, born May 13, 1963, is a citizen of the State of Virginia, residing in Newport News Virginia.

335. Plaintiff, Jazmine Norman, born November 3, 1994, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

336. Plaintiff, Lillian Norman, born July 13, 1944, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

337. Plaintiff, Georgia Obenaus, born April 18, 1966, is a citizen of the State of Virginia, residing in Hampton, Virginia.

338. Plaintiff, Meghan O'Brien, born February 15, 1986, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

339. Plaintiff, Bianca Odom, born January 26, 1989, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

340. Plaintiff, Brittany Odom, born November 14, 1994, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

341. Plaintiff, Charita Parker, born August 13, 1983, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

342. Plaintiff, Shylisle Patterson, born March 30, 1964, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

343. Plaintiff, Jimmell Peele, born October 13, 1978, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

344. Plaintiff, Paula Kay Perry, born March 26, 1955, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

345. Plaintiff, Latrice Pierce, born August 12, 1982, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

346. Plaintiff, Tiffany Pierre, born July 25, 1986, is a citizen of the State of Virginia, residing in Courtland, Virginia.

347. Plaintiff, Lucinia Plummer, born January 18, 1969, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

348. Plaintiff, Yvette Powell, born July 10, 1960, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

349. Plaintiff, Deanna Powers, born June 22, 1967, is a citizen of the State of Virginia, residing in Portsmouth Virginia.

350. Plaintiff, Wendy Pritchard, born September 4, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

351. Plaintiff, Trina Quinones, born May 15, 1982, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

352. Plaintiff, Kimberly Rager, born August 25, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

353. Plaintiff, Nora Rapada, born June 6, 1962, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

354. Plaintiff, Porsha Ready, born July 7, 1991, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

355. Plaintiff, Jackie Rector, born November 4, 1964, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

356. Plaintiff, Erica Reed, born February 7, 1982, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

357. Plaintiff, Keshira Reed, born March 16, 1996, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

358. Plaintiff, Kiyania Reese, born October 6, 1986, is a citizen of the State of North Carolina, residing in Charlotte, North Carolina.

359. Plaintiff, Lateshia Reese, born February 14, 1988, is a citizen of the State of Virginia, residing in Hampton, Virginia.

360. Plaintiff, Monique Reese, born March 15, 1988, is a citizen of the State of Virginia, residing in Portsmouth, Virginia

361. Plaintiff, Denise Reid, born December 28, 1972, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

362. Plaintiff, Patricia Renfrow, born November 4, 1952, is a citizen of the State of Virginia, residing in Newport News, Virginia.

363. Plaintiff, Ceira Reynolds, born July 30, 1995, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

364. Plaintiff, Fajier Rhodes, born November 5, 1979, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

365. Plaintiff, Pamela Rhodes, born March 26, 1968, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

366. Plaintiff, Asia Richards, born August 26, 1996, is a citizen of the State of Virginia, Hampton, Virginia.

367. Plaintiff, Christy Riddick, born June 22, 1972, is a citizen of the State of Virginia, residing in Courtland, Virginia.

368. Plaintiff, Sherry Riddick, born July 16, 1971, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

369. Plaintiff, Joi Rivera, born February 1, 1987, is a citizen of the State of Virginia, residing in Henrico, Virginia.

370. Plaintiff, Sade Rivera, born March 3, 1995, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

371. Plaintiff, Sharonda Robinson, born April 25, 1977, is a citizen of the State of Virginia, Suffolk, Virginia.

372. Plaintiff, Vontrese Rodgers, born November 30, 1969, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

373. Plaintiff, Sandra Rowe, born December 6, 1975, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

374. Plaintiff, Summer Ruff, born May 26, 1980, is a citizen of the State of North Carolina, residing in Moyock, North Carolina.

375. Plaintiff, Maisha Rumble, born June 16, 1987, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

376. Plaintiff, Janell Sabir, born January 26, 1964, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

377. Plaintiff, Jessica Sage, born November 13, 1974, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

378. Plaintiff, Melissa Salyers, born May 15, 1969, is a citizen of the State of Virginia, residing in Newport News, Virginia.

379. Plaintiff, Gia Sams, born November 5, 1962, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

380. Plaintiff, Debra Satterwhite, born January 23, 1957, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

381. Plaintiff, Nadasha Satterwhite, born November 20, 1978, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

382. Plaintiff, Wadiya Saunders, born December 5, 1971, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

383. Plaintiff, Crystal Scarborough, born August 6, 1982, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

384. Plaintiff, Chanta Scott, born December 30, 1976, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

385. Plaintiff, Chevonda Scott, born December 2, 1985, is a citizen of the State of Virginia, residing in Suffolk County, Virginia.

386. Plaintiff, Denise Scott, born May 30, 1964, is a citizen of the State of Virginia, Portsmouth, Virginia.

387. Plaintiff, Dianna Scott, born December 22, 1979, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

388. Plaintiff, Kiana Scott, born November 21, 1988, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

389. Plaintiff, Leslie Scott, born October 25, 1987, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

390. Plaintiff, Sanesia Scott, born September 7, 1972, is a citizen of the State of Georgia, residing in Lithonia, Georgia.

391. Plaintiff, Tanika Scott, born March 16, 1977, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

392. Plaintiff, Tashanda Scott, born September 27, 1992, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

393. Plaintiff, Shreya Shah, born April 30, 1989, is a citizen of the State of Virginia, Annandale, Virginia.

394. Plaintiff, Kathleen Shapley, born July 11, 1967, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

395. Plaintiff, Crystal Sharpe, born March 4, 1984, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

396. Plaintiff, Lisa Mounie Shelburne, born January 26, 1971, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

397. Plaintiff, Portia Sheriss, born September 2, 1989, is a citizen of the State of Virginia, residing in Hampton, Virginia.

398. Plaintiff, Bonita Sherrell, born July 10, 1965, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

399. Plaintiff, Queen Sherrod, born November 2, 1995, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

400. Plaintiff, Summers Shull, born November 30, 1973, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

401. Plaintiff, Brittany Simmons, born September 7, 1991, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

402. Plaintiff, Christina Baker Sinks, born October 27, 1971, is a citizen of the State of Virginia , residing in Chesapeake, Virginia.

403. Plaintiff, Tacara Skeeter, born September 19, 1989, is a citizen of the State of Virginia , residing in Hampton, Virginia.

404. Plaintiff, Ramona Slayton, born September 20, 1983, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

405. Plaintiff, Jessica Smith, born November 5, 1983, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

406. Plaintiff, Kimberly Smith, born December 31, 1970, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

407. Plaintiff, Sandra Smith, born May 8, 1985, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

408. Plaintiff, Sequoia Smith, born February 21, 1969, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

409. Plaintiff, Sheila Smith, born December 20, 1955, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

410. Plaintiff, Aimee Sparling, born July 6, 1965, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

411. Plaintiff, Yolanda Speight, born November 6, 1975, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

412. Plaintiff, Angel Speller, born January 25, 1998, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

413. Plaintiff, Tawanda Speller, born July 1, 1973, is a citizen of the State of Virginia, residing in Newport News, Virginia.

414. Plaintiff, Kayla Spence, born January 20, 1995, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

415. Plaintiff, Stacey Spires, born November 11, 1975, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

416. Plaintiff, Wanda Stallings, born October 4, 1954, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

417. Plaintiff, Katrina Stallins, born December 19, 1972, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

418. Plaintiff, Tina Starks, born September 11, 1979, is a citizen of the State of North Carolina, residing in Raleigh, North Carolina.

419. Plaintiff, Jennifer Starr, born April 2, 1973, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

420. Plaintiff, Samira Stephens, born June 6, 1967, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

421. Plaintiff, Arika Stevens, born February 11, 1996, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

422. Plaintiff, April Stokes, born April 6, 1981, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

423. Plaintiff, Kikia Stokes, born September 3, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

424. Plaintiff, Channing Studwell, born October 30, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

425. Plaintiff, Parcenette Tan, born May 2, 1980, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

426. Plaintiff, Shannon Tapscott, born February 6, 1982, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

427. Plaintiff, Gabrielle Taylor, born September 13, 1989, is a citizen of the State of Virginia, residing in Newport News, Virginia.

428. Plaintiff, Krystal Taylor, born January 23, 1985, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

429. Plaintiff, Madison Taylor, born September 1, 1984, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

430. Plaintiff, Tiffany Taylor, born February 2, 1990, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

431. Plaintiff, Brittney Temple, born January 16, 1991, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

432. Plaintiff, Jelisa Terry, born May 10, 1994, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

433. Plaintiff, Quana Terry, born February 21, 1985, is a citizen of the State of Virginia, residing in Newport News, Virginia.

434. Plaintiff, Leslie Thomas-Harris, born January 3, 1974, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

435. Plaintiff, April Thomas, born May 28, 1961, is a citizen of the State of Virginia, residing Chesapeake, Virginia.

436. Plaintiff, Michele Thompson, born October 30, 1971, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

437. Plaintiff, Tre'elle Tolbert, born June 20, 1990, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

438. Plaintiff, Ashley Trotter, born August 12, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

439. Plaintiff, Jivonda Tucker, born October 28, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

440. Plaintiff, Patsy Tucker, born October 17, 1962, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

441. Plaintiff, Nicole Turner, born October 28, 1983, is a citizen of the State of North Carolina, residing in Moyock, North Carolina.

442. Plaintiff, Holly Tute, born October 31, 1971, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

443. Plaintiff, Tina Twine, born May 11, 1966, is a citizen of the State of North Carolina, residing in Hertford, North Carolina.

444. Plaintiff, Chandra Tyson, born April 7, 1955, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

445. Plaintiff, Heather Umberger, born July 8, 1975, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

446. Plaintiff, Rosalyn Valentine, born April 13, 1978, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

447. Plaintiff, Annie (Peggy) Vanthul, born August 5, 1956, is a citizen of the State of Virginia, residing in Fredericksburg, Virginia.

448. Plaintiff, Christian Vaughan, born July 19, 1983, is a citizen of the State of North Carolina, residing in Moyock, North Carolina.

449. Plaintiff, Johnetta Vaughan, born July 22, 1974, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

450. Plaintiff, Veronica Vaughan, born August 19, 1977, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

451. Plaintiff, Barbara Vazquez, born November 18, 1965, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

452. Plaintiff, Stephanie Villarreal, born August 12, 1964, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

453. Plaintiff, Tanika Vincent, born March 31, 1976, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

454. Plaintiff, Lucia Vinci, born July 13, 1992, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

455. Plaintiff, Tonya Vinson- Hainsworth, born May 23, 1982, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

456. Plaintiff, Tarquashia Waddler, born July 21, 1993, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

457. Plaintiff, Ann Walker, born February 20, 1969, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

458. Plaintiff, Ashley Walker, born March 25, 1996, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

459. Plaintiff, Christy Walker, born November 21, 1969, is a citizen of the State of Virginia, residing in Windsor, Virginia.

460. Plaintiff, Michelle Walker, born November 26, 1971, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

461. Plaintiff, Tamesha Walker, born February 7, 1986, is a citizen of the State of Virginia, residing in Hampton Virginia, Virginia.

462. Plaintiff, Bridget Ward, born August 22, 1973, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

463. Plaintiff, Cathy Ward, born April 28, 1956, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

464. Plaintiff, Dierdra Ward, born November 19, 1962, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

465. Plaintiff, Karen Warren, born May 19, 1967, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

466. Plaintiff, Laura Warren, born July 16, 1987, is a citizen of the State of Virginia, residing in Suffolk Virginia, Virginia.

467. Plaintiff, Linda Warren, born August 22, 1955, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

468. Plaintiff, Shemeka Warren, born January 20, 1980, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

469. Plaintiff, Cheryl Washington, born December 28, 1956, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

470. Plaintiff, Tammy Washington, born April 3, 1968, is a citizen of the State of Virginia, residing in Newport News, Virginia.

471. Plaintiff, Tamika Wescott, born May 16, 1978, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

472. Plaintiff, Bianca West, born July 8, 1992, is a citizen of the State of Virginia, residing in Virginia Beach Virginia, Virginia.

473. Plaintiff, Eboni West, born November 30, 1976, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

474. Plaintiff, Sherri Wheeler, born September 28, 1966, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

475. Plaintiff, Vickie Whidbee, born January 12, 1974, is a citizen of the State of North Carolina, residing in Elizabeth City, North Carolina.

476. Plaintiff, Cathy Whitaker, born August 29, 1964, is a citizen of the State of Virginia, residing in Chesterfield, Virginia.

477. Plaintiff, Mary Lou Whitaker, born May 15, 1951, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

478. Plaintiff, LeQuisha White, born March 22, 1977, is a citizen of the State of Virginia, residing in Newport News, Virginia.

479. Plaintiff, Lynette White, born April 17, 1969, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

480. Plaintiff, Relyea White, born July 7, 1996, is a citizen of the State of Virginia, residing in Newport News, Virginia.

481. Plaintiff, Wilma White, born April 13, 1962, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

482. Plaintiff, Ashanti Whitfield, born April 27, 2000, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

483. Plaintiff, Lakesha Whiting, born September 22, 1975, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

484. Plaintiff, Tiffany Whitney, born June 3, 1984, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

485. Plaintiff, Du'Wayla Wiggins, born December 18, 1999, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

486. Plaintiff, Saranise Wilder, born September 24, 1984, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

487. Plaintiff, Jan Wilkins, born August 26, 1967, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

488. Plaintiff, Peggy Wilkins, born August 18, 1985, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

489. Plaintiff, Tyrina Wilkins, born December 27, 1981, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

490. Plaintiff, Angela Williams, born March 5, 1993, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

491. Plaintiff, Chessie Williams, born February 26, 1977, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

492. Plaintiff, Cynthia Williams, born April 7, 1957, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

493. Plaintiff, Donna Williams, born March 6, 1985, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

494. Plaintiff, Kenitra Williams, born July 30, 1977, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

495. Plaintiff, Keona Williams, born June 18, 1989, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

496. Plaintiff, La'toya Williams, born February 28, 1978, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

497. Plaintiff, Luqueen Williams, born September 22, 1986, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

498. Plaintiff, Neva Williams, born November 4, 1985, is a citizen of the State of Virginia, residing in Newport News, Virginia.

499. Plaintiff, Rebecca Williams, born January 6, 1962, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

500. Plaintiff, Sonya Williams, born May 2, 1966, is a citizen of the State of North Carolina, residing in Havelock, North Carolina.

501. Plaintiff, Tamika Williams, born July 7, 1987, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

502. Plaintiff, Yovone Williams, born August 28, 1978, is a citizen of the State of Virginia, residing in Newport News, Virginia.

503. Plaintiff, Angela Wilson, born June 16, 1980, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

504. Plaintiff, Annette Wilson, born June 17, 1965, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

505. Plaintiff, Eretta Wilson, born June 30, 1980, is a citizen of the State of Virginia, residing in Hampton, Virginia.

506. Plaintiff, Jennifer Wilson, born December 21, 1969, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

507. Plaintiff, Latoya Wilson, born June 16, 1985, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

508. Plaintiff, Michelle Wilson, born June 5, 1969, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

509. Plaintiff, Toynessia Wilson, born May 15, 1977, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

510. Plaintiff, Fredrika Winborne, born October 7, 1974, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

511. Plaintiff, Kim Wint, born July 23, 1957, is a citizen of the State of Virginia, residing in Norfolk, Virginia.

512. Plaintiff, Arlene Wood, born November 23, 1954, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

513. Plaintiff, Madyson Woods, born November 1, 1994, is a citizen of the State of Virginia, residing in Chesapeake, Virginia.

514. Plaintiff, Mariah Woods, born March 6, 1991, is a citizen of the State of New Jersey, residing in Hillside, New Jersey.

515. Plaintiff, Dawn Worells, born March 29, 1965, is a citizen of the State of Virginia, residing in Virginia Beach, Virginia.

516. Plaintiff, Crystal Worrell, born March 08, 1983, is a citizen of the State of Virginia, residing in Suffolk, Virginia.

517. Plaintiff, Dana Worthington, born July 29, 1979, is a citizen of the State of Florida, residing in Altamonte Springs, Florida.

518. Plaintiff, Kimberly W. Wright, born February 20, 1968, is a citizen of the State of Virginia, residing in Portsmouth, Virginia.

519. Plaintiff, Tonya Wright, born February 9, 1976, is a citizen of the State of Virginia, residing in Hampton, Virginia.

520. Plaintiff, Rachel Zuiderveen, born August 19, 1974, is a citizen of the State of North Carolina, residing in Moyock, North Carolina.

521. Defendant CRMC is a hospital located in Chesapeake, Virginia, offering “new technologies, state-of-the-art facilities, breakthrough clinical protocols and leading-edge electronic information systems [that] make each patient’s care faster, safer, and more effective.”

522. Defendant CRMC’s mission is to improve the health and well-being of the community it serves, guided by its core values of service, dignity, safety, integrity, and innovation.

523. Defendant CRMC’s President and CEO (the “CRMC CEO”) is responsible for carrying out CRMC’s mission, providing strategic leadership and operational oversight.

524. The CRMC CEO oversees an Executive Committee composed of the Chief Operating & Nursing Officer, Chief Medical Officer, Chief Administrative Officer, Chief Financial Officer, Chief Physician Relations Officer, and Chief Human Resources Officer.

525. Defendant Buckley was CRMC CEO from 1978 to 2005.

526. Defendant Buckley is a resident of Chesapeake, Virginia.
527. Defendant Mosley was CRMC CEO from 2005 to 2010.
528. Defendant Mosley is a resident of Chesapeake, Virginia.
529. Defendant Dixon was CRMC CEO from 2010 to 2013.
530. Defendant Dixon is a resident of Chesapeake, Virginia.
531. Defendant Bastone was CRMC CEO from 2013 to 2016.
532. Defendant Bastone is a resident of Orange County, California.
533. Defendant Jackson was installed as CRMC CEO on December 1, 2016. He remains in this position.
534. Defendant Jackson is a resident of Chesapeake, Virginia.
535. At all relevant times, CRMC was conducting and doing business in Chesapeake, Virginia, as a health care provider, and its employees, directors, managers, officers, physicians, nursing staff, and other hospital personnel were agents and/or apparent agents of CRMC, and all conduct by said individuals alleged herein are imputed to CRMC as a matter of law.
536. At all times and places pertinent to this action, Chesapeake Regional acted through its employees, agents, servants, workmen, partners, officers, directors, and joint venturers, including, but not limited to, the CRMC CEOs and Perwaiz.

FACTS

CRMC's January 8, 2025 Indictment

537. On January 8, 2025, CRMC was indicted for conspiracy to defraud the United States and interfere with government functions, and health care fraud, relating to its credentialing of CRMC physician Javaid Perwaiz, and fraudulent billing related to Perwaiz's unnecessary and

medically unjustified obstetrics and gynecology procedures, from in or around January 2010 to in or around November 2019 (“the Indictment”).

538. The Indictment alleges Perwaiz and CRMC’s scheme to defraud health care benefit programs consisted of Perwaiz’s unnecessary and medically unjustified surgeries, including the sterilization of female patients without consent, other unnecessary gynecologic surgeries, and unnecessary elective inductions presenting risks to pregnant women and newborns.

539. The Indictment alleges that successive CRMC CEOs continued to credential and grant privileges to Perwaiz despite his prior misconduct and staff observations, reported to CRMC leadership, that Perwaiz was performing unnecessary and uninformed operations and engaging in fraudulent billing practices.

540. Defendant CRMC obstructed the filing of this action by Plaintiffs by fraudulently billing them for medically unnecessary surgeries pursuant to Va. Code § 8.01-229(D).

541. Plaintiffs’ civil claims, set forth below, arise out of the “same set of facts” as the Indictment pursuant to Va. Code § 8.01-229(K).

542. Plaintiffs are patients on whom Perwaiz performed unnecessary and uninformed gynecologic and obstetric surgeries or procedures at CRMC, from 1984 through November 8, 2019, enabled by five successive CRMC CEOs, Defendants, as part of a scheme to defraud health care benefit programs.

543. The costs of Plaintiffs’ unnecessary and uninformed surgeries or procedures were reimbursed through their respective health care benefit programs.

544. The billing for certain Plaintiffs' unnecessary and uninformed surgeries and procedures—constituting the scheme to defraud health-care benefit programs—occurred within the past ten years.

Perwaiz's History of Misconduct Enabled by Successive CRMC CEOs

545. CRMC CEO Donald S. Buckley first credentialed and granted CRMC privileges to Perwaiz in April 1984.

546. While Perwaiz's application for privileges was pending in 1983, Maryview Hospital in Portsmouth, Virginia notified Buckley that Perwaiz's privileges at Maryview had been terminated earlier that year.

547. Maryview terminated Perwaiz's privileges for performing unnecessary gynecologic surgeries, including irreversible hysterectomies on patients.

548. Despite CRMC's Department of Surgery initially declaring Perwaiz unacceptable for appointment due to his Maryview suspension, Buckley granted Perwaiz privileges to practice at CRMC.

549. When Perwaiz was later subject to felony court proceedings for tax fraud in 1995 and 1996, for which he pled guilty to two of the counts, Buckley wrote and submitted a letter of support for Perwaiz's sentencing, calling Perwaiz his "personal friend."

550. Following Perwaiz's felony convictions for tax fraud, the Virginia Board of Medicine (the "Board") revoked his medical license in 1996.

551. Buckley filed another letter in support of Perwaiz for a 1996 Board hearing to determine whether his license should be reinstated. In his letter, Buckley indicated Perwaiz's surgeries resulted in substantial profit to CRMC.

552. For the same hearing, a local OB/GYN with privileges at CRMC, W.R., provided information to the Board that two-thirds of Perwaiz's surgeries were medically unnecessary, Perwaiz had a high rate of surgery on young girls with minimal problems, and Perwaiz repeatedly operated on the same patients and conducted recurring surgeries on benign cysts, adding up to "a very dangerous situation for patients."

553. W.R. noted that other doctors in his practice shared his concerns.

554. The CRMC Executive Committee, led by Buckley, met after the Board hearing to discuss W.R.'s testimony, viewing it as "a behavioral issue" to be addressed "at the department level."

555. In July 1996, the Executive Committee sent W.R. a letter demanding he provide documents supporting his testimony. W. R. ultimately declined, citing counsel's advice and patient confidentiality.

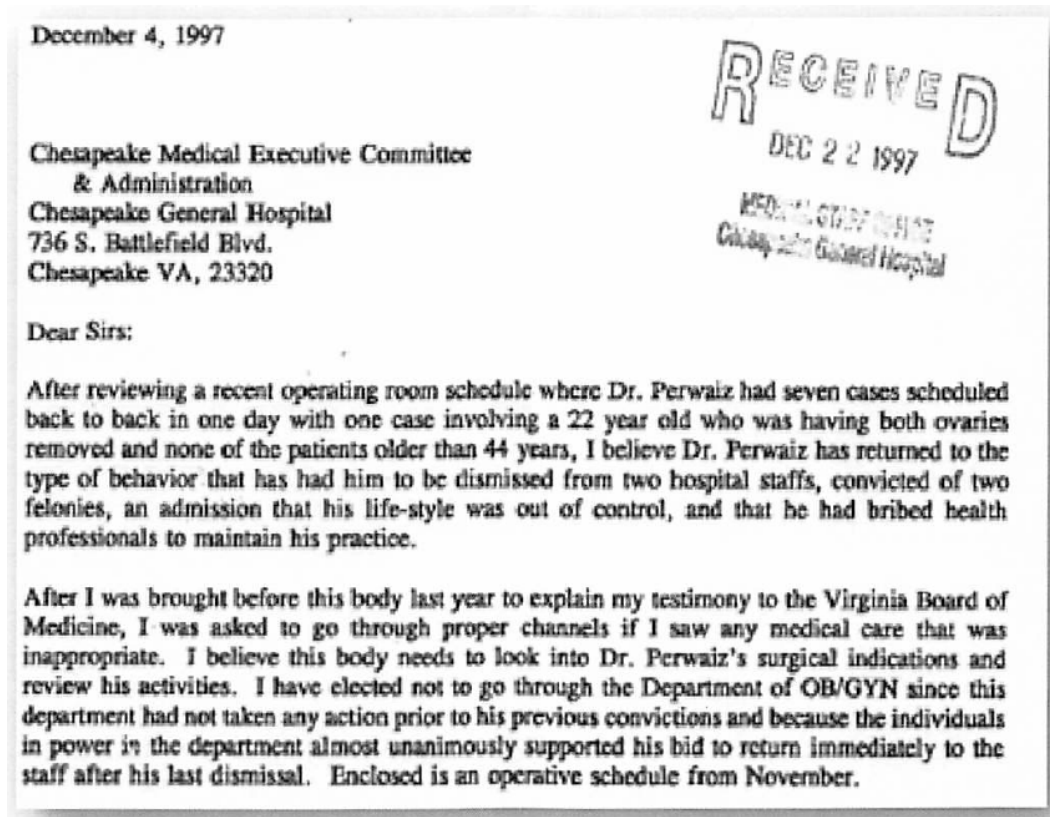
556. In September 1996, the Executive Committee, led by Buckley, sent W.R. a letter of reprimand which in part, read, "The Medical Staff Executive Committee has determined that [your statements] were reasonably likely to be harmful to the Hospital's best interests and inconsistent with the Hospital's objectives and is recommending that you receive a letter of admonition and reprimand...You are hereby warned to reframe from making such unsupportable statements in any forum, and most importantly, in a public forum. If the Hospital Authority becomes aware of similar action on your part in the future, you may expect initiation of more severe corrective action."

557. The Executive Committee, led by Buckley, then initiated a peer review of W.R. and formally reprimanded him for failing to participate in this peer review process in November 1996.

558. The Executive Committee, led by Buckley, sent W.R. a letter in October 1996 demanding that he issue a letter of apology to Buckley for his comments at the Board hearing.

559. W.R. complied and wrote a letter apologizing, but also stated he was in the process of gathering documentation to confirm the remarks he made about Perwaiz.

560. The following year, on December 4, 1997, W.R. again expressed concern about Perwaiz in a letter to the Executive Committee:



561. W.R.'s December 1997 letter expressed his concern regarding Perwaiz's recent operating room schedule of seven cases, including no patients older than 44 and an operation removing both ovaries of a 22-year-old.

562. In his December 1997 letter, W.R. asked the Executive Committee to "look into Dr. Perwaiz's surgical indications and review his activities."

563. Other than a registered nurse's limited review of four of the seven cases W.R. referenced in his letter, the Executive Committee conducted no investigation or review of Perwaiz as a result of this letter.

564. Instead, the Executive Committee, led by Buckley, sent W.R. a letter in May 1998 telling him it was inappropriate to release an operating schedule to an outside party.

565. Perwaiz was a defendant in at least eight medical malpractice lawsuits resulting from the procedures he performed at CRMC from 1988 to 2019.

566. In a 2009 case where a patient suffered a puncture wound to her bladder during a hysterectomy, Perwaiz's documentation was revealed to consist of only "about 15 words" and his deposition testimony conflicted with a nurse's contemporaneous notes.

567. In a 2014 case, a patient sued Perwaiz alleging he tricked her into having surgery by telling her cancer was imminent, converted her surgery to an abdominal hysterectomy without her consent, and included false statements in her medical records.

568. In or around 2008 or 2009, while Mosley was the CEO, the CRMC neonatology group raised concerns about Perwaiz routinely delivering babies early through elective induction or delivery by Cesarean section, without medical necessity, in breach of the standard of care.

569. The need for intensive neonatal care for the babies Perwaiz delivered early was so common that CRMC neonatologists referred to it as the "Perwaiz special."

570. In or around the same time, CRMC appointed Perwaiz as its Chief of Obstetrics, in which role he continued through at least 2010, and for which he received a periodic stipend from CRMC.

571. In June 2015, a Nurse Manager wrote to the Chief Medical Officer about the issue of doctors, including Perwaiz, scheduling delivery procedures early, prior to 39 weeks, without supporting documentation as well as false documentation by obstetricians.

572. Perwaiz was nonetheless allowed to continue the practice of medically unnecessary early inductions or Cesarean sections.

573. Perwaiz's routine of scheduling medically unnecessary early inductions for his patients, at times convenient for his schedule, was an "open secret" in the CRMC Labor and Delivery Unit.

574. Despite reports to the L&D Nurse Manager, no action was taken.

575. Perwaiz's surgical documentation was often grossly insufficient.

576. CRMC coders and billers noticed repeated insufficient documentation in Perwaiz's patient records.

577. The Chief Medical Information Officer, the Director of Care Management, and the Director of Health Information Management were aware of Perwaiz's insufficient documentation as this issue was raised in August 2014 and March 2016 emails.

578. Unlike other CRMC surgeons, Perwaiz did not use photography or videographer in the operation room.

579. A surgical technologist informed the CRMC operating room manager that Perwaiz would not use these safeguards. The technologist refused to continue working with Perwaiz because she could not see what he was doing during operations.

580. In January 2014, Perwaiz altered a consent form after a patient was under anesthesia so that he could perform a more invasive surgery.

581. While the January 2014 patient agreed to an abdominal hysterectomy (a removal of the uterus and cervix through an incision in the abdomen), Perwaiz also performed a bilateral salpingo-oophorectomy (removal of the fallopian tubes and ovaries), which the patient stated before surgery she did not want.

582. The surgical nurse wrote in an email to the Director of Perioperative Services that Perwaiz added the procedure to the consent form after the patient was under anesthesia.

583. In August 2014, Perwaiz again modified a patient's consent form to authorize removal of tissue from her left ovary in addition to the surgery she consented to on her right ovary.

584. A nurse later wrote an email to the Director of Perioperative Services that, prior to the August 2014 surgery, the operating room nurse verified with both Perwaiz and the patient that the surgery was to be performed on her right side.

585. The nurse's email was forwarded to the Chief Medical Officer, but he took no action.

586. In November 2014, a patient reported to CRMC that Perwaiz had performed a hysterectomy on her for a purportedly pre-cancerous lesion, but that she later learned the lesion will still present after the surgery.

587. This November 2014 complaint was forwarded to the Chief Medical Officer and other employees, but no action was taken.

588. CRMC nurses observed that Perwiz's patients often lacked knowledge about their planned surgeries.

589. A post-surgery nurse's concerns regarding Perwaiz's patients' misinformation about their surgeries were escalated to the Chief Medical Officer in or around 2018.

590. For example, CRMC medical records reflect that a patient told a nurse she believed she was having surgery to address an enlarged right ovary, but Perwaiz instead performed a hysterectomy on the patient and left her ovaries intact.

591. CRMC required at least 48 hours' notice for non-emergent surgical cases to obtain the necessary authorizations and approvals from health care benefit programs.

592. Perwaiz routinely scheduled surgeries, including sterilization procedures, on an accelerated basis, without adhering to CRMC's established standards, to reduce the likelihood that patients would change their minds about the surgeries.

593. Perwaiz often scheduled his Saturday surgeries on late Friday afternoon.

594. In July 2015, an Insurance Services/Pre-Registration Manager wrote that his team was at a "major disadvantage" in performing authorization management because of Perwaiz's deviation from policy.

595. In August 2015, the Scheduling Manager wrote an email to the Director of Care Management, the Chief Financial Officer, and other CRMC directors that Perwaiz's scheduling is an "ongoing issue" and that Perwaiz "continues to do whatever he wants."

596. Nonetheless, CRMC continued to allow Perwaiz to deviate from CRMC policy.

597. Perwaiz also routinely and knowingly misclassified inpatient surgeries as outpatient procedures to evade the heightened scrutiny and increased documentation that health care benefit programs require for inpatient services.

598. CRMC employees routinely raised the inpatient surgery issue to CRMC executives, but Perwaiz was allowed to continue his practice.

599. On August 19, 2015, CRMC's Director of Patient Access wrote in an email that "executive support" is needed to address the "huge compliance issue" of specific physicians refusing to schedule inpatient procedures as inpatient.

600. On August 28, 2015, an Insurance Services/Pre-Registration Manager emailed the Director of Care Management, the Director of Patient Access, and the Scheduling Manager regarding Perwaiz, stating "We have gone through this over the years, including myself, but we . . . need support from the C-Suite and the Directors to make sure that [Perwaiz] adheres to the same protocols other surgeons do."

601. In October 2015, CRMC's Chief Medical Officer held a meeting with Perwaiz, the Director of Care Management, and the Assistant to the Director of Care Management about the inpatient surgery issue.

602. After the meeting, Perwaiz openly refused to comply with CRMC standards.

603. CRMC schedulers, pre-admission staff, and nurses repeatedly emailed the Director of Care Management that Perwaiz continued his practice of scheduling inpatient surgeries as outpatient.

604. In November 2016, then-President and CEO Defendant Bastone met with Perwaiz and the Director of Care Management about this issue.

605. At this meeting, Perwaiz threatened to take his practice elsewhere if CRMC did not allow him to continue performing inpatient surgeries as outpatient.

606. Around the time of this meeting, Perwaiz had recently been identified by CRMC's internal metrics as a "top ten" performer surpassing some multi-physician groups as a solo practitioner.

607. After the meeting, Perwaiz continued using the improper outpatient classification.

608. Weeks later, The Director of Care Management wrote in an email to the Chief Medical Officer, Chief Financial Officer, and the Director of Finance that addressing this issue “needs to be an executive level decision.”

609. At some point in or around November 2016, the Director of Care Management addressed Perwaiz about the inpatient surgery issue, while accompanied by Defendant Bastone. In response, Perwaiz spat on the Director of Care Management.

610. In May 2017, a Nurse Case Manager emailed the Director of Care Management about Perwaiz repeatedly performing inpatient surgeries as outpatient and the Director of Care Management responded “I have tried, it is up to the new CEO to change.” The “new CEO” was Defendant Jackson.

611. In response to another email about Perwaiz’s non-compliance, the Director of Care Management wrote that she had “kicked this one up to the VP [vice president] level.”

612. In August 2017, the Chief Medical Officer responded to a similar complaint from the Director of Care Management, stating he would get Defendant Reese to “hopefully agree to not allow it to be posted.”

613. In 2018, the Director of Care Management stated, in response to another internal complaint about the inpatient surgery issue, that “until administration changes rules we are stuck.”

614. Despite these reports and repeated pleas for the CEO to take action, Defendant Reese allowed Perwaiz to continue scheduling inpatient procedures as outpatient.

615. In June 2019, the Chief Medical Officer requested a financial analysis of the inpatient surgery issue which showed health care benefit programs continued to pay CRMC the outpatient rate for dozens of inpatient surgeries.

616. Perwaiz continued to post, perform, and bill for such surgeries until his arrest for health care fraud on November 8, 2019.

Successive CRMC CEOs' Credentialing and Privileging of Perwaiz

617. The facts that a physician graduates from medical school and completes a residency or fellowship, alone, do not make him a “good,” competent, or safe physician.

618. It is the duty of a hospital, and ultimately its CEO, to analyze a physician’s skills to determine whether he or she has the experience, ability, and competence to safely practice in the areas requested.

619. Credentialing is the practice by which hospitals evaluate and verify the qualifications of their healthcare providers to ensure that each individual possesses the necessary qualifications to provide safe and competent medical services to patients.

620. Once a healthcare provider is “credentialed,” the “privileging” process evaluates the provider’s expertise in specific practice areas to determine his or her competence and what duties and or medical services he or she can safely perform.

621. Both the credentialing and privileging processes take place after a healthcare provider has met the minimum state licensure requirements.

622. A hospital granting privileges must evaluate a healthcare provider’s ability—both physically and mentally—to safely perform the privileges requested.

623. A hospital granting privileges must communicate with a healthcare provider’s “peers” as part of the credentialing and privileging processes.

624. A thorough, consistent, and comprehensive clinical privileging process helps ensure that healthcare providers can practice only in areas for which they are qualified and competent.

625. In addition, all hospitals who wish to receive Medicare dollars must be accredited by the Joint Commission.

626. The Joint Commission is an independent, non-profit organization that accredits and certifies healthcare organizations in the United States.

627. CRMC receives Medicare dollars and therefore is required to comply with Joint Commission standards.

628. Joint Commission Standard MS.06.01.03 requires an evidence-based, objective process to issue a decision to credential or re-credential a physician.

629. Joint Commission Standard MS.06.01.05 requires an evidence-based, objective process to issue a decision to grant or deny privileges or renew existing privileges to a physician.

630. The ultimate goals of the Joint Commission standards are patient safety and improved healthcare quality.

631. Determining the competency of practitioners to provide high quality, safe patient care is one of the most important decisions a hospital must make.

632. At all relevant times, CRMC was required to comply with Joint Commission Standards.

633. In order to perform a procedure at CRMC, a physician must either be a CRMC employee or be credentialed and have privileges at the hospital.

634. Privileging and credentialing are important aspects of CRMC's hospital operations and quality systems.

635. The CRMC CEO oversees this credentialing and privileging process.

636. The CRMC CEO significantly influences this credentialing and privileging process.

637. The CRMC CEO ultimately approves credentialing and privileging recommendations.

638. The CRMC CEO can deny a physician credentials or privileges at CRMC.

639. The CRMC CEO works closely with the Executive Committee, including the Chief Medical Officer, in making credentialing and privileging determinations.

640. The CRMC CEO periodically reviewed the credentials/privileges of practicing physicians, including Perwaiz, every two years.

641. The CRMC CEO continually re-credentialed Perwaiz approximately every two years between 1984 and 2019 despite knowing that Perwaiz's privileges had been terminated at another hospital for performing unnecessary surgeries and that he was convicted of two federal felonies in 1996.

642. Perwaiz's credentialing packet contained information about his tax convictions and Maryview suspension.

643. Perwaiz's credentialing file also contained notes regarding Perwaiz's medical malpractice lawsuits resulting from procedures he performed at CRMC.

644. Defendant Buckley re-credentialed Perwaiz from 1984 to 2005 and granted him privileges at CRMC, despite his knowledge of Perwaiz's prior and reported misconduct and medical malpractice lawsuits.

645. Defendant Buckley knew or should have known of Perwaiz's long and varied history of misconduct as recounted herein.

646. Before re-credentialing and privileging Perwaiz, Defendant Buckley knew or should have known that Perwaiz posed a grave danger to patients in his care.

647. Buckley violated Joint Commission standards with regard to his re-credentialing and privileging of Perwaiz.

648. Defendant Mosley re-credentialed Perwaiz from 2005 to 2010 and granted him privileges at CRMC, despite his knowledge of Perwaiz's prior and reported misconduct and medical malpractice lawsuits.

649. Defendant Mosley knew or should have known of Perwaiz's long and varied history of misconduct as recounted herein.

650. Before re-credentialing and privileging Perwaiz, Defendant Mosley knew or should have known that Perwaiz posed a grave danger to patients in his care.

651. Mosley violated Joint Commission standards with regard to his re-credentialing and privileging of Perwaiz.

652. Defendant Dixon re-credentialed Perwaiz from 2010 to 2013, and granted him privileges at CRMC, despite his knowledge of Perwaiz's prior and reported misconduct and medical malpractice lawsuits.

653. Defendant Dixon knew or should have known of Perwaiz's long and varied history of misconduct as recounted herein.

654. Before re-credentialing and privileging Perwaiz, Defendant Dixon knew or should have known that Perwaiz posed a grave danger to patients in his care.

655. Dixon violated Joint Commission standards with regard to his re-credentialing and privileging of Perwaiz.

656. Defendant Bastone re-credentialed Perwaiz from 2013 to 2016, and granted him privileges at CRMC, despite his knowledge of Perwaiz's prior and reported misconduct and medical malpractice lawsuits.

657. Defendant Bastone knew or should have known of Perwaiz's long and varied history of misconduct as recounted herein.

658. Defendant Bastone knew or should have known about the 2014 medical malpractice case against Perwaiz, where a patient alleged Perwaiz tricked her into a surgery without consent and included false statements in her medical records.

659. Defendant Bastone knew or should have known that a Nurse Manager complained to the Chief Medical Officer in June 2015 about Perwaiz scheduling delivery procedures too early.

660. Defendant Bastone knew or should have known that Perwaiz's surgical documentation was insufficient, as raised in emails among CRMC leadership in August 2014 and March 2016.

661. Defendant Bastone knew or should have known that Perwaiz altered the consent forms of two patients in January 2014 and August 2014 as these incidents were reported to CRMC leadership.

662. Defendant Bastone knew or should have known about the November 2014 patient complaint stating that Perwaiz performed a hysterectomy on her for a pre-cancerous lesion, but she later learned the lesion was still present after the surgery.

663. Defendant Bastone knew or should have known that Perwaiz routinely and knowingly misclassified surgeries as outpatient procedures to evade the heightened security and increase documentation required for inpatient services as complaints were made to CRMC directors in August 2015 and the Chief Medical Officer met with Perwaiz and others in October 2015 to address the issue.

664. Moreover, Defendant Bastone himself met with Perwaiz and the Director of Care Management about Perwaiz scheduling inpatient procedures as outpatient in November 2016 and Perwaiz spat on the Director of Care Management.

665. Before re-credentialing and privileging Perwaiz, Defendant Bastone knew or should have known that Perwaiz posed a grave danger to patients in his care.

666. Bastone violated Joint Commission standards with regard to his re-credentialing and privileging of Perwaiz.

667. Defendant Jackson re-credentialed Perwaiz, and granted him privileges at CRMC, from 2016 to Perwaiz's arrest in November 2019, despite his knowledge of Perwaiz's prior and reported misconduct and medical malpractice lawsuits.

668. Defendant Jackson knew or should have known of Perwaiz's long and varied history of misconduct as recounted herein.

669. Defendant Jackson knew or should have known that the inpatient surgery issue involving Perwaiz continued under his leadership, as the Chief Medical Officer referenced Defendant Jackson in an email about the issue in August 2017.

670. Moreover, Defendant Jackson knew or should have known that in June 2019 the Chief Medical Officer requested a financial analysis of the inpatient surgery issue, which showed health care benefit programs continued to pay the hospital the outpatient rate for dozens of inpatient surgeries.

671. Defendant Jackson knew or should have known that Perwaiz's patients often lacked knowledge about their planned surgeries, as a nurse's report stating such was escalated to the Chief Medical Officer in or around 2018.

672. Before re-credentialing and privileging Perwaiz, Defendant Jackson knew or should have known that Perwaiz posed a grave danger to patients in his care.

673. Defendant Jackson violated Joint Commission standards with regard to his re-credentialing and privileging of Perwaiz.

674. Credentialing and privileging require ongoing application of continuous, integrated, multifaceted processes to evaluate a physician's performance, competence, safety, and ability.

675. The Joint Commission mandates this evaluation in the form of an Ongoing Professional Practice Evaluation ("OPPE") (MS.08.01.03) and a Focused Professional Practice Evaluation ("FPPE") (MS.08.01.01).

676. During an OPPE and FPPE, hospitals are required to evaluate the appropriateness of operative and other procedures performed by an applicant.

677. The Joint Commission requires that each physician who is credentialed and privileged through the organized medical staff should have an OPPE profile that is updated at a regular interval.

678. The CRMC CEO ultimately oversees the OPPE and FPPE processes.

679. Defendants either completely failed to utilize OPPE and FPPE with respect to Perwaiz, or they failed to utilize appropriate and competent OPPE and FPPE processes capable of identifying dangerous and incompetent physicians such as Perwaiz.

680. Defendants either never evaluated the appropriateness of operative and other procedures performed by Perwaiz, or they failed to conduct a reasonable and prudent evaluation of the appropriateness of Perwaiz's operations and other procedures.

681. During an OPPE, hospitals are required to evaluate the appropriateness of care, including significant departures from the accepted standard of practice.

682. Defendants either never evaluated the appropriateness of Perwaiz's care, including his significant departures from generally accepted standards of practice, or they failed to conduct a reasonable and prudent evaluation of Perwaiz's departures from generally accepted standards of practice and his ability and/or willingness to comply with generally accepted standards of practice.

683. Defendants oversaw, or were supposed to oversee, entire departments and committees assigned to risk management, quality assurance, and credentialing/privileging.

684. Defendants had available to them detailed records regarding Perwaiz's operations and other procedures.

685. Defendants had available to them detailed information and statistics regarding the type and number of procedures that Perwaiz was performing.

686. Defendants had available to them detailed reports and complaints involving Perwaiz's misconduct.

687. These claims arise out of Defendants' failures to comply with their legal, ethical, and moral duties to monitor Perwaiz and protect patients from his dangerous practices.

688. Moreover, these claims arise from the affirmative acts of Defendants, whose decisions created and increased the risk of harm to patients at CRMC.

689. For nearly a decade, Defendants enabled Perwaiz to practice at CRMC despite having actual and/or constructive knowledge that he was recommending and performing dangerous, incompetent, unnecessary, and life-altering surgical procedures on patients.

Perwaiz's Treatment of Plaintiffs

690. Defendants enabled Perwaiz to operate on Plaintiffs by credentialing, re-credentialing, and privileging Perwaiz to practice at CRMC, while ignoring Perwaiz's prior and reported misconduct that clearly showed he posed a grave danger to women in his care.

691. Defendants knew or should have known that Perwaiz posed a grave danger to Plaintiffs, given his documented history of misconduct related to his obstetric and gynecologic operations, including sterilizing patients on an accelerated timeline, altering consent forms, routinely delivering babies prior to 39 weeks without medical necessity, misinforming patients about operations, issuing grossly insufficient medical documentation, and fraudulently billing in relation to procedures he performed.

692. Plaintiff Terrika Abram received medical treatment from Perwaiz at CRMC from around June 2019 to January 2020.

693. On or around September 30, 2019, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Abram without consent.

694. On or around November 2, 2019, Perwaiz performed a second unnecessary and uninformed tubal ligation on Ms. Abram without consent.

695. Plaintiff Jennifer Acero received medical treatment from Perwaiz at CRMC from around 2005 to around November 2019.

696. In or around July 2019, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Acero.

697. Plaintiff Kayla Adams received medical treatment from Perwaiz at CRMC from around 2011 to around 2017.

698. In or around September 2017, Perwaiz clamped Ms. Adams' fallopian tubes as part of an unnecessary and uninformed tubal ligation procedure without consent.

699. Perwaiz also performed many unnecessary and uninformed dilation and curettage surgeries on Ms. Adams.

700. For around seven to eight years, Perwaiz performed a dilation and curettage surgery on Ms. Adams approximately every six months.

701. Plaintiff, Tabatha Adam received medical treatment from Perwaiz at CRMC from around 2003 to around 2007.

702. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Adam without consent.

703. Plaintiff Takila Adams received medical treatment from Perwaiz at CRMC in or around November 2019.

704. In or around November 2019, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Adams.

705. During that time, Perwaiz performed many unnecessary and uninformed gynecological surgeries.

706. Plaintiff Denita Adams-Jordan received medical treatment from Perwaiz at CRMC from around 2005 to around 2019.

707. From around 2005 to around November 2019, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Adams-Jordan.

708. During this time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Adams-Jordan without consent.

709. During this time, Perwaiz also performed an unnecessary and uninformed partial hysterectomy on Ms. Adams-Jordan.

710. Plaintiff Caroline Adamski received medical treatment from Perwaiz at CRMC from around 1991 to around 2002.

711. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Adamski without consent.

712. During that time, Perwaiz performed an unnecessary, uninformed and untimely c-section on Ms. Adamski.

713. Plaintiff Patricia Ahart received medical treatment from Perwaiz at CRMC from around 1989 to around 1997.

714. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Ahart without consent.

715. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Ahart.

716. Plaintiff Kelcy Albrecht received medical treatment from Perwaiz at CRMC from around 2008 to around 2019.

717. During that time, Perwaiz performed an unnecessary and LEEP procedure on Ms. Albrecht.

718. Plaintiff Juanita Alford received medical treatment from Perwaiz at CRMC on or around 1994.

719. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Alford without consent.

720. Plaintiff Michelle Allen received medical treatment from Perwaiz at CRMC from around 1988 to around 2012.

721. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Allen without consent.

722. During that time, Perwaiz performed multiple unnecessary and uninformed dilatation and curettages on Ms. Allen.

723. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Allen.

724. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Allen.

725. Plaintiff Tanisha Amos received medical treatment from Perwaiz at CRMC from around 1998 to around 1999.

726. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Amos without her consent.

727. During that time, Perwaiz performed an untimely unnecessary and uninformed early induction of labor on Ms. Amos without her consent.

728. Plaintiff Patsy Armstead received medical treatment from Perwaiz at CRMC from around 1980 to around 1983.

729. During that time, Perwaiz performed an unnecessary and uninformed oophorectomy on Ms. Armstead without consent.

730. During that time, Perwaiz performed an unnecessary and uninformed bladder surgery on Ms. Armstead without consent.

731. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Armstead without consent.

732. Plaintiff Annetta Askew received medical treatment from Perwaiz at CRMC from around 1999 to around 2000.

733. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Askew without consent.

734. Plaintiff Julie Atkins received medical treatment from Perwaiz at CRMC from around June 2005 to around October 2019.

735. Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Atkins, the last around 2019.

736. Plaintiff Thea Avery received medical treatment from Perwaiz at CRMC on or around 2015.

737. During that time, Perwaiz performed an unnecessary and uninformed LEEP procedure on Ms. Avery without consent.

738. Plaintiff Jaquay Bailey received medical treatment from Perwaiz at CRMC from around April 2011 to around August 2018.

739. In or around 2011, Perwaiz performed an unnecessary and uninformed Cesarean section on Ms. Bailey.

740. In or around 2018, Perwaiz performed an unnecessary and uninformed fibroid removal procedure on Ms. Bailey.

741. Plaintiff Johnell Bails received medical treatment from Perwaiz from around 2000 to around August 2019.

742. During that time, Perwaiz performed an unnecessary and uninformed left oophorectomy and salpingectomy on Ms. Bails without consent.

743. During that time, Perwaiz performed an unnecessary and uninformed right oophorectomy on Ms. Bails without consent.

744. During that time, Perwaiz performed an unnecessary and uninformed abdominal wall mass removal on Ms. Bails without consent.

745. In or around July 2019, Perwaiz removed adhesions due to prior multiple operations unnecessarily or without Ms. Bails' informed consent.

746. Plaintiff Sara Baker received medical treatment from Perwaiz at CRMC in or around 2018.

747. In 2018, when Ms. Baker was pregnant, Perwaiz induced her labor unnecessarily or without her informed consent.

748. Perwaiz then performed an unnecessary and uninformed procedure to remove endometriosis and cysts prior to the delivery of the placenta.

749. Plaintiff Ashley Banks received medical treatment from Perwaiz at CRMC in or around 2015.

750. During that time, Perwaiz performed an unnecessary and uninformed early induction of labor on Ms. Banks.

751. Plaintiff Deborah Barnes received medical treatment from Perwaiz at CRMC in or around 2011.

752. During that time, Perwaiz performed an unnecessary and uninformed early induction of labor on Ms. Barnes.

753. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Barnes without consent.

754. Plaintiff Latasha Battle received medical treatment from Perwaiz at CRMC from on or around 2011.

755. During that time, Perwaiz performed an unnecessary and uninformed salpingectomy on Ms. Battle without consent.

756. Plaintiff Takeala Bazemore received medical treatment from Perwaiz at CRMC from around 2001 to around 2006.

757. During that time, Perwaiz failed to perform a wanted tubal ligation during a c-section on Ms. Bazemore in order to perform a separate procedure at a later date.

758. Plaintiff Demetra Beamon received medical treatment from Perwaiz at CRMC in or around 2013.

759. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Beamon without consent.

760. Plaintiff Myesha Bellamy received medical treatment from Perwaiz at CRMC from around 2017 to 2019.

761. Perwaiz performed unnecessary and uninformed LEEPs on Ms. Bellamy without consent.

762. Perwaiz also performed unnecessary and uninformed dilation and curettage surgeries on Ms. Bellamy without consent.

763. Plaintiff Dashia Bennett received medical treatment from Perwaiz at CRMC in or around July 2017.

764. On or around July 22, 2017, Perwaiz performed an unnecessary and uninformed Cesarean section on Ms. Bennett when she was 36 weeks pregnant without consent.

765. Thereafter, Perwaiz performed an unnecessary and uninformed tubal procedure on Ms. Bennett without consent.

766. Plaintiff Ebony Benton received medical treatment from Perwaiz at CRMC in or around 2003.

767. During this time, Perwaiz performed an unnecessary and uninformed early induction of labor and c-section on Ms. Benton without consent.

768. Plaintiff Erica Benton received medical treatment from Perwaiz at CRMC from on or around 2007 to 2014.

769. During this time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Benton without consent after telling her she had cancer cells on her uterus.

770. Plaintiff Shauna Benton received medical treatment from Perwaiz at CRMC from around 2015 to around 2018.

771. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Benton.

772. Plaintiff Ashley Beraud-Frazier received medical treatment from Perwaiz at CRMC from around August 2016 to around November 2016.

773. On or around September 17, 2016, Perwaiz performed an unnecessary and uninformed partial hysterectomy on Ms. Beraud-Frazier.

774. Plaintiff Cynthia Black received medical treatment from Perwaiz at CRMC from on or around 1978 to 1988.

775. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Black without consent.

776. Plaintiff Precious Blackmon received medical treatment from Perwaiz at CRMC from on or around 2006 to 2009.

777. During this time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Blackmon without consent.

778. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Blackmon without consent.

779. Plaintiff Amanda Blake received medical treatment from Perwaiz at CRMC from on or around 1992 to 1993.

780. During this time, Perwaiz performed an unnecessary and uninformed c-section on Ms. Blake without consent.

781. Plaintiff Jamequa Blow received medical treatment from Perwaiz at CRMC from around 2013 to around 2019.

782. During that time, Perwaiz performed an unnecessary and uninformed LEEP procedure on Ms. Blow without her consent.

783. During that time, Perwaiz performed an unnecessary and uninformed gynecological procedure to clean out her fallopian tubes on Ms. Blow without her consent.

784. In or around December 2015, Perwaiz performed an unnecessary and uninformed Cesarean section on Ms. Blow.

785. In or around February 2016, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Blow.

786. In or around 2018, Perwaiz performed a second unnecessary and uninformed Cesarean section on Ms. Blow.

787. During the course of Ms. Blow's treatment, Perwaiz also performed an unnecessary and uninformed procedure involving her fallopian tubes.

788. Plaintiff Sheila Blow received medical treatment from Perwaiz at CRMC from around 2008 to around 2009.

789. During this time, Perwaiz performed an unnecessary and uninformed early induction of labor and tubal ligation without consent on Ms. Blow.

790. During this time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Blow without her consent.

791. Plaintiff Dorothy Boone received medical treatment from Perwaiz at CRMC from around 1987 to around 2008.

792. During this time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Boone without her consent.

793. During this time, Perwaiz performed an unnecessary and uninformed exploratory surgery on Ms. Boone without consent.

794. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Boone without consent.

795. Plaintiff Christine Borg received medical treatment from Perwaiz at CRMC on or around 2002.

796. During this time, Perwaiz performed an unnecessary and uninformed c-section on Ms. Borg without consent.

797. Plaintiff Christina Bowne received medical treatment from Perwaiz at CRMC from on or around 1990 to 2006.

798. During this time, Perwaiz performed an unnecessary and uninformed dilatation and curettage on Ms. Bowne without consent.

799. During this time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Bowne without consent.

800. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Bowne without consent.

801. Plaintiff Diane Boyd received medical treatment from Perwaiz at CRMC from on or around 2011 to 2014.

802. During this time, Perwaiz performed multiple unnecessary and uninformed dilatation and curettages on Ms. Boyd without consent.

803. During this time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Boyd without consent.

804. Plaintiff Linda Boyd received medical treatment from Perwaiz at CRMC from around March 1980 to around April 2019.

805. During this time, Perwaiz performed three unnecessary and uninformed laparoscopic procedures on Ms. Boyd without consent.

806. Perwaiz also performed an unnecessary and uninformed hysterectomy on Ms. Boyd without consent.

807. Plaintiff Karla Bradley received medical treatment from Perwaiz at CRMC from around August 14, 2012, to November 1, 2019.

808. During that time, PERwaiz performed an unnecessary and uninformed and untimely c-section on Ms. Bradley, without her consent.

809. Ms. Bradley was scheduled for an unnecessary and uninformed partial hysterectomy with Perwaiz in or around November 2019, but the operation was canceled due to Perwaiz's arrest.

810. Plaintiff Margaret Brandtner received medical treatment from Perwaiz at CRMC from around 1979 to around 2019.

811. Plaintiff Amy Braziel received medical treatment from Perwaiz at CRMC from around 2002 to 2011.

812. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Braziel without consent.

813. Plaintiff Darlene Bremby received medical treatment from Perwaiz at CRMC from on or around 2005 to 2010.

814. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Bremby without consent.

815. Plaintiff Tasha Brewer received medical treatment from Perwaiz at CRMC from on or around 2013 to 2014.

816. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Brewer without consent after informing her she had cancer when she did not.

817. Plaintiff Cynthia Bricker received medical treatment from Perwaiz at CRMC from on or around 1988 to 2008.

818. During this time, Perwaiz performed an unnecessary and uninformed c-section on Ms. Bricker without consent.

819. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Bricker without consent.

820. Plaintiff Nancy Brinkley received medical treatment from Perwaiz from around 1998 to 2000.

821. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Bricker without consent.

822. During that time, Perwaiz performed an unnecessary and uninformed laparotomy on Ms. Bricker without her consent.

823. Plaintiff Brittney Brown received medical treatment from Perwaiz from around 2009 to 2018.

824. In or around 2017, when Ms. Brown was pregnant, Perwaiz induced her labor unnecessarily or without her informed consent.

825. In or around 2018, when Ms. Brown was pregnant, Perwaiz induced her labor again unnecessarily or without her informed consent.

826. During that time, Perwaiz performed unnecessary and uninformed dilatation and curettages on Ms. Brown without her consent.

827. Plaintiff Dana Brown received medical treatment from Perwaiz at CRMC in or around 2014 to August 2015.

828. During that time, Perwaiz performed an untimely and unnecessary and uninformed induction and episiotomy on Ms. Brown without her consent.

829. Plaintiff Erica Brown received medical treatment from Perwaiz from around 2012 to 2018.

830. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Brown without her consent.

831. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Brown without her consent.

832. Plaintiff Gereka Brown received medical treatment from Perwaiz at CRMC from around 2014 to around March 1, 2017.

833. Perwaiz performed unnecessary and uninformed fibroid cyst and dilation and curettage surgeries on Ms. Brown on or around 2014, January 6, 2016, February 14, 2016, and March 2017.

834. Plaintiff Jerri Brown received medical treatment from Perwaiz from on or around 1983 to 1984.

835. During that time, Perwaiz performed an unnecessary and uninformed early induction of labor on Ms. Brown without her consent.

836. Plaintiff Melissa Brown received medical treatment from Perwaiz from around August 2016 to around October 2016.

837. In or around September 2016, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Brown.

838. Plaintiff, Nikita Brown received medical treatment from Perwaiz at CRMC from on our around 2008 to 2015.

839. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Brown without her consent.

840. Plaintiff Nikita N. Brown received medical treatment from Perwaiz at CRMC from around 2010 to around 2016.

841. During this time, Perwaiz performed four unnecessary and uninformed surgeries on Ms. Brown in or around 2015.

842. Plaintiff Sandra Brown received treatment from Perwaiz at CRMC from around May 2007 to around June 2019.

843. Plaintiff Teshya Brown received treatment from Perwaiz at CRMC in or around 2018.

844. Plaintiff Unita Brown received medical treatment from Perwaiz from on or around 2003.

845. During that time, Perwaiz performed an unnecessary and uninformed dilatation and curettage on Ms. Brown without her consent.

846. Plaintiff Tammy Bruan received medical treatment from Perwaiz at CRMC in or around 1992 to 1993.

847. Plaintiff Brianna Bryant received medical treatment from Perwaiz at CRMC in or around 2018.

848. In or around 2018, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Bryant.

849. Plaintiff Christon Bryant is the son of Plaintiff Dracena Holloway who received medical treatment from Perwaiz at CRMC from 2002 to 2018.

850. In 2006, Perwaiz performed an untimely unnecessary induction of labor on Ms. Holloway resulting in Christon Bryant being “a Perwaiz special” and developmentally delayed.

851. Plaintiff Dwayne Bryant is the son of Plaintiff Dracena Holloway who received medical treatment from Perwaiz at CRMC from 2002 to 2018.

852. In 2009, Perwaiz performed an untimely unnecessary induction of labor on Ms. Holloway resulting in Dwayne Bryant being “a Perwaiz special” and developmentally delayed.

853. Plaintiff Isaiah Bryant is the son of Plaintiff Dracena Holloway who received medical treatment from Perwaiz at CRMC from 2002 to 2018.

854. In 2008, Perwaiz performed an untimely unnecessary induction of labor on Ms. Holloway resulting in Isaiah Bryant being “a Perwaiz special” and developmentally delayed.

855. Plaintiff Rhonda Bryant received medical treatment from Perwaiz from on or around 2009 to 2014.

856. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Bryant without her consent.

857. Plaintiff Shaquala Burden received medical treatment from Perwaiz from on or around 2012 to 2013.

858. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Burden without her consent.

859. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section of Ms. Burden without her consent.

860. Plaintiff Kimberly Burress received medical treatment from Perwaiz from on or around 2013 to 2014.

861. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Burress without her consent.

862. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Burress without her consent.

863. Plaintiff Ashlee Butler received medical treatment from Perwaiz at CRMC from around 2012 to around 2019.

864. In or around 2018, Perwaiz performed an unnecessary and uninformed Cesarean section on Ms. Butler.

865. In or around April 2019, Perwaiz performed an unnecessary and uninformed surgery on Ms. Butler for a purported abnormal Papanicolaou test (pap smear).

866. Plaintiff Brittany Canty received medical treatment from Perwaiz at CRMC from around 2014 to around 2019.

867. During this time, when Ms. Canty was pregnant, Perwaiz performed an unnecessary and uninformed induction of Ms. Canty and performed an unnecessary c-section.

868. Plaintiff Megan Carew received medical treatment from Perwaiz at CRMC from around 2012.

869. During this time, when Perwaiz performed unnecessary and uninformed dilation and curettage surgeries and a c-section on Ms. Carew.

870. Plaintiff Rolelian Carlisle received medical treatment from Perwaiz at CRMC from around October 2006 to around March 2018.

871. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Carlisle without consent

872. During this time, Perwaiz performed unnecessary and uninformed piecemeal hysterectomies by removing one organ at a time rather than performing a hysterectomy at once on Ms. Carlisle without consent..

873. Perwaiz also performed approximately three unnecessary and uninformed dilation and curettage surgeries on Ms. Carlisle.

874. Plaintiff Alisia Carter received medical treatment from Perwaiz at CRMC from around 2005 to around 2017.

875. From around 2005 to around 2017, Perwaiz also performed an unnecessary and uninformed tubal ligation on Ms. Carter without consent.

876. During this time, Perwaiz performed untimely, unnecessary and uninformed three c-sections on Ms. Carter without consent.

877. Plaintiff Katrina Carter received medical treatment from Perwaiz at CRMC from around May 14, 2008, to around January 20, 2019.

878. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage procedures on Ms. Carter without her consent.

879. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Carter without her consent.

880. Plaintiff Nacet Carter received medical treatment from Perwaiz from on or around 1998 to April 2019.

881. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage on Ms. Carter without her consent.

882. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries and procedures on Ms. Carter without her consent.

883. During that time, Perwaiz performed multiple unnecessary and uninformed tubal ligation on Ms. Carter without her consent.

884. Plaintiff Brenda Cartwright received medical treatment from Perwaiz from on or around 1987 to 1991.

885. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Cartwright without her consent.

886. During that time, Perwaiz performed an unnecessary and uninformed breast biopsy on Ms. Cartwright without her consent.

887. Plaintiff April Cason received medical treatment from Perwaiz from on or around 2005 to 2010.

888. During that time, Perwaiz performed unnecessary and uninformed early induction of labor on two occasions on Ms. Cason without her consent.

889. Plaintiff Donna Casper received medical treatment from Perwaiz at CRMC in or around 2017.

890. In or around 2017, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Casper.

891. Plaintiff Linda Castle received medical treatment from Perwaiz at CRMC in or around 2019.

892. In or around 2019, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Castle necessitating an emergency repair surgery for internal bleeding.

893. Plaintiff Migdalia Castro received medical treatment from Perwaiz at CRMC from around June 2017 to around August 2017.

894. In or around July 2017, Perwaiz performed an unnecessary and uninformed gynecologic surgery on Ms. Castro without consent.

895. Plaintiff Jennifer Cecil received medical treatment from Perwaiz at CRMC in or around 2005.

896. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Cecil without consent.

897. During that time, Perwaiz performed multiple unnecessary and uninformed biopsies on Ms. Cecil without consent.

898. During that time, Perwaiz performed multiple unnecessary and uninformed surgeries on Ms. Cecil without consent for cancer she never had.

899. During that time, Perwaiz performed an unnecessary early induction of labor on Ms. Cecil without consent.

900. Plaintiff Robin Cerda received medical treatment from Perwaiz from on or around 1990 to 1996.

901. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Cerda without her consent.

902. During that time, Perwaiz performed an unnecessary and uninformed tubal dissection on Ms. Cerda without her consent.

903. Plaintiff April Cherry received medical treatment from Perwaiz at CRMC from around 2012 to around July 2019.

904. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Cerry without her consent.

905. Plaintiff Jovanda Cherry received medical treatment from Perwaiz at CRMC from around 2001 to around 2016.

906. Plaintiff Shanell Cherry received medical treatment from Perwaiz at CRMC from around March 12, 2008, to around July 2019.

907. During that time, Perwaiz performed unnecessary and uninformed dilation and curettage surgeries on Ms. Cherry without her consent.

908. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Cherry without her consent.

909. Plaintiff Antoinette Chisholm received medical treatment from Perwaiz from on or around 2004 to 2011.

910. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Chisholm without her consent.

911. During this time, Perwaiz, performed unnecessary and uninformed multiple tubal ligations on Ms. Chisholm without her consent.

912. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Chisholm without her consent.

913. During this time, Perwaiz performed an unnecessary and uninformed early induction of labor and untimely, unnecessary and uninformed c-section on Ms. Chisholm without her consent.

914. Plaintiff Natasha Citizen received medical treatment from Perwaiz at CRMC in or around 2019.

915. In or around April 2019, Perwaiz performed an unnecessary and uninformed hysterectomy, including the removal of fibroids, on Ms. Citizen without her consent.

916. Plaintiff Ciara Clark received medical treatment from Perwaiz from on or around 2003 to 2006.

917. During that time, Perwaiz performed an unnecessary and uninformed dilation and evacuation on Ms. Clark without her consent.

918. Plaintiff Dominique Clark received medical treatment from Perwaiz at CRMC from around 2006 to around 2014.

919. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Clark without her consent.

920. During this time, Perwaiz performed an unnecessary and uninformed bladder lift surgery on Ms. Clark without her consent.

921. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Clark without her consent.

922. During this time, Perwaiz performed multiple unnecessary, uninformed and untimely c-section on Ms. Clark without her consent.

923. Plaintiff Patricia Clarke received medical treatment from Perwaiz from on or around 1981 to 1989.

924. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Clarke without her consent.

925. Plaintiff Chelsea Clemons received medical treatment from Perwaiz at CRMC from around 2012 to around 2017.

926. In or around 2016, Perwaiz performed an unnecessary and uninformed ovarian cyst removal procedure on Ms. Clemons without her consent

927. During that time, Perwaiz performed an unnecessary and uninformed dilation and curettage on Ms. Clemons without her consent.

928. Plaintiff, Phillissia Clinton, received medical treatment from Perwaiz from on or around 1982 to 2019.

929. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Clinton without her consent.

930. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Clinton without her consent.

931. During that time, Perwaiz performed an unnecessary and uninformed hemorrhoidectomy on Ms. Clinton without her consent and outside the scope of a practicing OB/GYN.

932. Plaintiff Jennifer Clifton received medical treatment from Perwaiz on or around 2010.

933. During that time, Perwaiz performed an unnecessary and uninformed fibroidectomy on Ms. Clifton without her consent.

934. Plaintiff Sherrie Cobb received medical treatment from Perwaiz from on or around 2007 to 2015.

935. During that time, Perwaiz performed an unnecessary and uninformed cystectomies on Ms. Cobb without her consent.

936. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Cobb without her consent damaging her tubes and leaving her infertile.

937. Plaintiff Ronnesha Cochrane received medical treatment from Perwaiz on or around 2012.

938. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Cochrane without her consent.

939. Plaintiff Flolephia Colden received medical treatment from Perwaiz from on or around 2000 to 2010.

940. During that time, Perwaiz performed an unnecessary and uninformed gynecological surgeries for cancer that she never had on Ms. Colden without her consent.

941. During that time, Perwaiz performed multiple lysis of adhesion surgeries caused by his multiple unnecessary surgeries on Ms. Colden.

942. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Colden without her consent.

943. Plaintiff Jakyra Coleman received medical treatment from Perwaiz at CRMC from on or around April 12, 2019, to on or around October 31, 2019.

944. Plaintiff Cherise Conley received medical treatment from Perwaiz at CRMC from or around 2010 to 2019.

945. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Conley without her consent.

946. Plaintiff Sharonda Cook received medical treatment from Perwaiz from on or around 2013 to 2014.

947. During that time, Perwaiz performed an unnecessary and uninformed an early induction of labor on Ms. Cook without her consent.

948. Plaintiff Cynthia Cooper received medical treatment from Perwaiz at CRMC in or around July 2018.

949. In or around July 2018, Perwaiz performed an unnecessary and uninformed hysterectomy and left oophorectomy on Ms. Cooper without her consent.

950. Plaintiff Dorothy Cooper received medical treatment from Perwaiz from on or around 2005 to 2008.

951. During that time, Perwaiz performed an unnecessary and uninformed tubal surgeries on Ms. Cooper without her consent.

952. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological laparoscopic surgeries on Ms. Cooper without her consent.

953. Plaintiff Shaketa Cooper received medical treatment from Perwaiz from on or around 2011 to 2015.

954. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Cooper without her consent.

955. Plaintiff Takiea Cooper received medical treatment from Perwaiz on or around 2001.

956. During that time, Perwaiz performed an unnecessary and uninformed vaginal exam on Ms. Cooper without gloves and without her consent.

957. During that time, Perwaiz performed an untimely birth of Ms. Cooper's child.

958. Plaintiff Verlana Cooper received medical treatment from Perwaiz at CRMC from around February 2011 to around July 2017.

959. During this time, Perwaiz performed a surgery nearly every year on Ms. Cooper, mainly unnecessary and uninformed dilation and curettage surgeries.

960. In or around 2017, Perwaiz performed an unnecessary and uninformed Cesarean section on Ms. Cooper without her consent.

961. In or around 2017, Perwaiz also performed an unnecessary and uninformed tubal ligation on Ms. Cooper without consent.

962. Plaintiff Tonya Corbett received medical treatment from Perwaiz on or around 2007.

963. During that time, Perwaiz performed an unnecessary and uninformed right oophorectomy on Ms. Corbett without her consent.

964. During that time, Perwaiz performed an unnecessary and uninformed right tubal surgery on Ms. Corbett without her consent.

965. Plaintiff Belinda Corpew received medical treatment from Perwaiz at CRMC from on or around 2006 to 2012.

966. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Corpew without her consent.

967. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Corpew without her consent.

968. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Corpew without her consent.

969. Plaintiff Herminia Corrales received medical treatment from Perwaiz at CRMC from on or around 2005 to 2010.

970. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Corrales without her consent.

971. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Corrales without her consent.

972. Plaintiff Keysha Cotton received medical treatment from Perwaiz at CRMC from around 2005 to around 2018.

973. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Cotton without her consent.

974. Plaintiff Francesca Covil received medical treatment from Perwaiz at CRMC in or around 2020.

975. Plaintiff Karrie Cox received medical treatment from Perwaiz at CRMC from 1999 to on or around 2006.

976. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Cox without her consent.

977. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Cox without her consent when she was only 29 years old.

978. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Cox without her consent.

979. Plaintiff Patricia Cradle received medical treatment from Perwaiz at CRMC on or around 1992.

980. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Cradle without her consent.

981. Plaintiff Grace Cribbs received medical treatment from Perwaiz at CRMC from around 2013 to around 2017.

982. Plaintiff Katelyn Crotts received medical treatment from Perwaiz at CRMC from around 2005 to around October 2019.

983. During this time, Perwaiz performed approximately 11 unnecessary and uninformed gynecologic procedures on Ms. Crotts, including dilation and curettage surgeries and laparoscopic procedures.

984. Plaintiff Kathryn Cummings received medical treatment from Perwaiz at CRMC from on or around January 1, 2012, to around November 2019.

985. Plaintiff Monica Curtin received medical treatment from Perwaiz at CRMC from on or around 1988.

986. During this time, Perwaiz performed multiple unnecessary and uninformed dilatation and curettages on Ms. Curtin without consent.

987. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Curtin without consent.

988. During this time, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Curtin without consent.

989. Plaintiff Danielle Dancy received medical treatment from Perwaiz at CRMC on or around 2013.

990. During this time, Perwaiz performed an unnecessary and uninformed and untimely c-section on Ms. Dancy without her consent.

991. Plaintiff Talisa Daniel received medical treatment from Perwaiz at CRMC on or around 2007.

992. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Daniel without her consent.

993. Plaintiff Kim Davis received medical treatment from Perwaiz at CRMC from on or around 1989 to 2012.

994. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Davis without her consent.

995. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Davis without her consent.

996. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Davis without her consent.

997. Plaintiff Montoya Davis received medical treatment from Perwaiz at CRMC on or 2012.

998. During that time, Perwaiz performed multiple unnecessary and uninformed surgeries on Ms. Davis without her consent.

999. Plaintiff Regina Davis received medical treatment from Perwaiz at CRMC on or around 2014.

1000. Plaintiff Shanetra Davis received medical treatment from Perwaiz at CRMC on or around 2010.

1001. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Davis without her consent.

1002. Plaintiff Tonya Davis received medical treatment from Perwaiz at CRMC from on or around 2016 to 2019.

1003. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Davis without her consent.

1004. Plaintiff Lakeisha Dawsey received medical treatment from Perwaiz at CRMC from on or around 2009 to 2014.

1005. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Dawsey without her consent.

1006. During that time, Perwaiz performed an unnecessary and uninformed gynecological procedures on Ms. Dawsey without her consent.

1007. Plaintiff Lakesha Dawson received medical treatment from Perwaiz at CRMC from around 2000 to around 2012.

1008. During this time, Perwaiz performed several unnecessary and uninformed gynecologic procedures on Ms. Dawson, including dilation and curettage surgeries without her consent.

1009. Plaintiff Cathleen De Foor received medical treatment from Perwaiz at CRMC from on or around 1987 to 1992.

1010. During that time, Perwaiz performed multiple unnecessary and uninformed punch biopsies on Ms. De Foor without her consent.

1011. Plaintiff Christal Deal received medical treatment from Perwaiz at CRMC on or around 1994.

1012. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Deal without her consent.

1013. During that time, Perwaiz performed an unnecessary and uninformed gynecological procedures on Ms. Deal without her consent.

1014. Plaintiff Angel Deans received medical treatment from Perwaiz at CRMC from on or around 2008 to 2019.

1015. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Deans without her consent.

1016. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Deans without her consent.

1017. Plaintiff Armecy Deberry received medical treatment from Perwaiz at CRMC from on or around 2008 to 2019.

1018. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Deberry without her consent.

1019. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Deberry without her consent.

1020. Plaintiff Yamanita Delbridge received medical treatment from Perwaiz at CRMC on or around 2018.

1021. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Delbridge without her consent.

1022. Plaintiff Trevis Deloatch received medical treatment from Perwaiz at CRMC from on or around 2006 to 2015.

1023. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Deloatch without her consent.

1024. Plaintiff Angela Dennis received medical treatment from Perwaiz at CRMC from on or around 2006 to 2018.

1025. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Dennis without her consent.

1026. Plaintiff Monecia Dennis received medical treatment from Perwaiz at CRMC from around 2009 to around 2019.

1027. During that time, Perwaiz performed an unnecessary and uninformed cystectomy on Ms. Dennis without her consent.

1028. Plaintiff Mona Dickerson received medical treatment from Perwaiz at CRMC from on or around March 15, 2014 to on or around March 3, 2018.

1029. Around 2016 and 2017, Perwaiz performed unnecessary and uninformed fibroid removal procedures on Ms. Dickerson without her consent.

1030. Plaintiff Diana Dixon received medical treatment from Perwaiz at CRMC on or around 1989.

1031. During that time, Perwaiz performed an unnecessary and uninformed early induction of labor on Ms. Dixon without her consent.

1032. Plaintiff Lahoma Dixon received medical treatment from Perwaiz at CRMC from around 2009 to around August 2011.

1033. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Dixon.

1034. Plaintiff Cynthia Donaldson received medical treatment from Perwaiz at CRMC from on or around 1985 to 2003.

1035. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Donaldson without her consent.

1036. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Donaldson without her consent.

1037. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Donaldson without her consent.

1038. Plaintiff Janaye Doughty received medical treatment from Perwaiz at CRMC from around 2009 to around 2017.

1039. Perwaiz also performed three unnecessary and uninformed surgeries to remove cysts on Ms. Doughty without her consent.

1040. During that time, Perwaiz performed an unnecessary and uninformed early induction of labor on Ms. Doughty without her consent.

1041. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Doughty without her consent.

1042. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Doughty without her consent.

1043. In or around 2024, Ms. Doughty faced life-threatening complications after her delivery of a baby due to scar tissue formed from the unnecessary and uninformed surgeries performed by Perwaiz.

1044. Plaintiff Laketha Drake received medical treatment from Perwaiz at CRMC from on or around 1989 to 2010.

1045. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Drake without her consent.

1046. During that time, Perwaiz performed an unnecessary and uninformed cystectomies on Ms. Drake without her consent.

1047. Plaintiff Lisa Drummond received medical treatment from Perwaiz at CRMC from around 2012 to around 2018.

1048. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Drummond without her consent.

1049. Plaintiff Sheila Duke received medical treatment from Perwaiz at CRMC from on or around 2005 to 2014.

1050. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Duke without her consent.

1051. Plaintiff Carrie Duvall received medical treatment from Perwaiz at CRMC from on or around 2002 to 2008.

1052. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Duvall without her consent.

1053. Plaintiff Ramona Eaton received medical treatment from Perwaiz at CRMC in or around 2021.

1054. Plaintiff Shaunta Edwards received medical treatment from Perwaiz at CRMC from around 2014 to around 2018.

1055. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages and gynecological procedures on Ms. Edwards without her consent.

1056. Plaintiff Darrie'l Elliot received medical treatment from Perwaiz at CRMC from around 2015 to around 2016.

1057. On or around January 29, 2016, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Elliot.

1058. Plaintiff Lakishia Elliott received medical treatment from Perwaiz at CRMC on or around 2018.

1059. During that time, Perwaiz performed an unnecessary and uninformed LEEP procedure on Ms. Elliott without her consent.

1060. Plaintiff Sandra Elliot received medical treatment from Perwaiz at CRMC from around 2002 to around 2015.

1061. During that time, Perwaiz performed an unnecessary and uninformed gynecological surgeries on Ms. Elliot without consent.

1062. Plaintiff Nadine C. Engen received medical treatment from Perwaiz at CRMC from on or around 1986 to 1996.

1063. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Engen without her consent.

1064. Plaintiff Kerry Ervin received medical treatment from Perwaiz at CRMC from around 2004 to around 2007.

1065. During this time, Perwaiz performed multiple unnecessary and uninformed untimely c-sections on Ms. Ervin without her consent.

1066. Plaintiff Cecelia Espinosa received medical treatment from Perwaiz at CRMC from around 2006 to around 2010.

1067. During this time, Perwaiz performed unnecessary and uninformed gynecological surgeries on Ms. Espinosa without her consent.

1068. Plaintiff Stephania Eure received medical treatment from Perwaiz at CRMC from on or around 1999 to 2000.

1069. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Eure without her consent.

1070. Plaintiff Desiree Evans received medical treatment from Perwaiz at CRMC in or around 2013 to 2014.

1071. During that time, Perwaiz performed an untimely and unnecessary and uninformed c-section on Ms. Evans without her consent.

1072. Plaintiff Mallory Evans received medical treatment from Perwaiz at CRMC in or around 2015 to 2016.

1073. Plaintiff Carolynn Facenda received medical treatment from Perwaiz at CRMC on or around 2018.

1074. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies and colposcopies on Ms. Facenda without her consent.

1075. Plaintiff Missy Farmer received medical treatment from Perwaiz at CRMC from on or around 1981 to 2012.

1076. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Farmer without her consent for cancer she never had.

1077. Plaintiff Marti Fasick received medical treatment from Perwaiz at CRMC in or around 2005 to 2007.

1078. During that time, Perwaiz performed an untimely induction and unnecessary and uninformed dilation and curettage on Ms. Fasick without her consent.

1079. Plaintiff LaTrena Fields-Brothers received medical treatment from Perwaiz at CRMC in or around 2018.

1080. On or around October 18, 2018, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Fields-Brothers, necessitating an emergency repair procedure on or around October 21, 2018.

1081. Plaintiff Danielle Fisher received medical treatment from Perwaiz at CRMC from around 2017 to around 2019.

1082. On or around May 4, 2018, Perwaiz performed an unnecessary and uninformed Cesarean section on Ms. Fisher without her consent

1083. Plaintiff Lourdes Fletcher received medical treatment from Perwaiz at CRMC from on or around 1982 to 2983.

1084. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Fletcher without her consent.

1085. Plaintiff Marie Frederick received medical treatment from Perwaiz at CRMC from on or around 2003 to 2006.

1086. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Frederick without her consent.

1087. Plaintiff Erika Freeland received medical treatment from Perwaiz at CRMC on or around 2015.

1088. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Freeland without her consent.

1089. During that time, Perwaiz performed an unnecessary and uninformed partial hysterectomy on Ms. Freeland without her consent.

1090. During that time, Perwaiz performed an unnecessary and uninformed total hysterectomy on Ms. Freeland without her consent.

1091. Plaintiff Melissa Full received medical treatment from Perwaiz at CRMC from on or around January 1, 2003, to on or around May 17, 2016.

1092. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Full without her consent.

1093. Plaintiff Anita Fuller received medical treatment from Perwaiz at CRMC from around 2018 to around 2019.

1094. In or around 2019, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Fuller without her consent.

1095. Plaintiff Eboni Futrell received medical treatment from Perwaiz at CRMC in or around 2017.

1096. In or around 2017, Perwaiz performed two unnecessary and uninformed dilation and curettage surgeries on Ms. Futrell without her consent.

1097. Plaintiff Kara Gainey received medical treatment from Perwaiz at CRMC from around February 2012 to around September 2017.

1098. During this time, Perwaiz performed unnecessary and uninformed gynecologic procedures on Ms. Gainey, including a tubal ligation and multiple dilation and curettage surgeries without consent.

1099. Plaintiff Christine Garrison received medical treatment from Perwaiz at CRMC from around 2004 to around 2019.

1100. During that time, Perwaiz performed multiple unnecessary and uninformed laparoscopic procedures on Ms. Garrison without her consent.

1101. Plaintiff Brittney Gary received medical treatment from Perwaiz at CRMC from around October 2008 to around March 2019.

1102. During this time, Perwaiz performed approximately thirteen unnecessary and uninformed gynecologic procedures, dilation and curettages (the first at 14 years old) on Ms. Gary, including a Cesarean section without her consent.

1103. Plaintiff Shander Gary received medical treatment from Perwaiz at CRMC from around 2010 to around 2021.

1104. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Gary without her consent.

1105. Plaintiff Jerri Gatewood received medical treatment from Perwaiz at CRMC on or around 1995.

1106. During this time, Perwaiz performed an unnecessary and uninformed c-section on Ms. Gatewood without her consent.

1107. Plaintiff Tamara Gatling received medical treatment from Perwaiz at CRMC in or around 2011.

1108. In or around 2011, Perwaiz performed an unnecessary and uninformed cystectomy and tubal ligation on Ms. Gatling without consent.

1109. Plaintiff Sheryl Gee received medical treatment from Perwaiz at CRMC from on or around 2008 to 2011.

1110. During that time, Perwaiz performed an unnecessary and uninformed fibroidectomy on Ms. Gee without her consent.

1111. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Gee without her consent.

1112. Plaintiff Netisha George received medical treatment from Perwaiz at CRMC from around 2010.

1113. In March 2010, Perwaiz performed an unnecessary and uninformed tubal ligation surgery on Ms. George without her consent.

1114. Plaintiff Donna Giddens received medical treatment from Perwaiz at CRMC on or around 1992.

1115. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Giddens without her consent.

1116. Plaintiff Kaitlin Gilbert received medical treatment from Perwaiz at CRMC from on or around January 15, 2019, to on or around October 5, 2019.

1117. During this time, when Ms. Gilbert was pregnant, Perwaiz performed an unnecessary and uninformed induction of early labor of Ms. Gilbert without her consent.

1118. Plaintiff Tangel Gilchrist received medical treatment from Perwaiz at CRMC on or around 2014.

1119. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Gilchrist without her consent.

1120. Plaintiff Brandy Gilliam received medical treatment from Perwaiz at CRMC from on or around November 2, 2015, to on or around July 21, 2017.

1121. On or around July 8, 2017, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Gilliam without her consent.

1122. Plaintiff Shameka Goldman received medical treatment from Perwaiz at CRMC from on or around 2000 to 2014.

1123. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Goldman without her consent.

1124. Plaintiff Lekia Goodman received medical treatment from Perwaiz at CRMC from on or around 2007 to 2013.

1125. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Goodman without her consent.

1126. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Goodman without her consent.

1127. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Goodman without her consent.

1128. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Goodman without her consent.

1129. Plaintiff April Goodwin received medical treatment from Perwaiz at CRMC from around 2016 to around 2018.

1130. On or around March 10, 2018, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Goodwin.

1131. Plaintiff Caressa Graham received medical treatment from Perwaiz at CRMC from on or around 2000 to 2010.

1132. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Grahama without her consent.

1133. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Corpew without her consent.

1134. Plaintiff Shanna Granger received medical treatment from Perwaiz at CRMC from around 2002 to around 2015.

1135. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Granger without her consent.

1136. During that time, Perwaiz performed multiple unnecessary and cystectomies on Ms. Granger without her consent.

1137. Plaintiff Hannah Grant received medical treatment from Perwaiz at CRMC from around July 2018 to around August 2018.

1138. On or around August 4, 2018, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Grant along with endometrial flushing without consent.

1139.

1140. Plaintiff Ada Gray received medical treatment from Perwaiz at CRMC from on or around 2008 to 2010.

1141. During that time, Perwaiz performed unnecessary and uninformed fibroidectomies on Ms. Gray without her consent.

1142. Plaintiff Olivia Gray received medical treatment from Perwaiz at CRMC from around 2016 to around 2019.

1143. In or around 2016, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Gray without her consent.

1144. Plaintiff Rosalin Green received medical treatment from Perwaiz at CRMC on or around 2015.

1145. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Green without her consent.

1146. Plaintiff Samantha Green received medical treatment from Perwaiz at CRMC from around February 2016 to around December 2016.

1147. During this time, Perwaiz performed an unnecessary and uninformed tubal ligation and hysterectomy on Ms. Green without her consent.

1148. Plaintiff Shareida Green received medical treatment from Perwaiz at CRMC on or around 2001.

1149. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Green without her consent.

1150. Plaintiff Chiquie Gregory received medical treatment from Perwaiz at CRMC from on or around 1990 to 1995.

1151. Plaintiff Dominique Gregory received medical treatment from Perwaiz at CRMC from on or around 2007 to 2009.

1152. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Gregory without her consent.

1153. Plaintiff Tanisha Griffin received medical treatment from Perwaiz at CRMC from around 2007 to around 2014.

1154. During this time, Perwaiz performed unnecessary and uninformed gynecologic procedures on Ms. Griffin, including cystectomy and untimely c-section without her consent.

1155. Plaintiff Cherrie Hairston received medical treatment from Perwaiz at CRMC from on or around 2009 to 2018.

1156. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Hairston without her consent.

1157. During that time, Perwaiz performed unnecessary and uninformed cystectomies on Ms. Hairston without her consent.

1158. During that time, Perwaiz performed unnecessary and uninformed early inductions of labor on Ms. Hairston without her consent.

1159. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-sections on Ms. Hairston without her consent.

1160. Plaintiff Chamekay Hall received medical treatment from Perwaiz at CRMC from around 1995 to around October 2019.

1161. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Hall without her consent.

1162. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hall without her consent.

1163. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Hall without her consent.

1164. Plaintiff Ginger Hall received medical treatment from Perwaiz at CRMC from around 2015 to around 2017.

1165. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Hall without her consent.

1166. In or around 2016, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hall without her consent.

1167. Plaintiff Jacala Hall received medical treatment from Perwaiz at CRMC from around 2003 to around 2004.

1168. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation surgery on Ms. Hall without her consent.

1169. Plaintiff Latanya Hamlin received medical treatment from Perwaiz at CRMC from around 2001 to around to 2002.

1170. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Hamlin without her consent.

1171. Plaintiff Tamika Hamraz received medical treatment from Perwaiz at CRMC from around January 2014 to around January 2020.

1172. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Hamraz without her consent.

1173. Plaintiff Crystal Hardy received medical treatment from Perwaiz at CRMC in or around 2007 to 2018.

1174. Upon information and belief, in 2010, Perwaiz delivered Crystal Hardy's child by an unnecessary and untimely c-section.

1175. Upon information and belief, in 2011, Perwaiz delivered Crystal Hardy's child by an unnecessary and untimely c-section.

1176. In or around 2018, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Crystal Hardy.

1177. Plaintiff Keisha Hardy received medical treatment from Perwaiz at CRMC from around 2013 to around 2019.

1178. During that time, Perwaiz performed an unnecessary and uninformed partial hysterectomy on Ms. Hardy without her consent.

1179. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hardy without her consent.

1180. Plaintiff Tamara Hardy received medical treatment from Perwaiz at CRMC from or around 2018 to 2019.

1181. During that time, Perwaiz performed an unnecessary and uninformed laparoscopic surgery on Ms. Hardy without her consent.

1182. Plaintiff Ashley Harris received medical treatment from Perwaiz at CRMC in or around October 2019.

1183. In or around 2019, Perwaiz performed an unnecessary and uninformed cyst removal and lesion removal procedure on Ms. Harris without her consent.

1184. Plaintiff Charlethia Harris received medical treatment from Perwaiz at CRMC on or around 2002.

1185. During that time, Perwaiz performed an unnecessary and uninformed fibroidectomy on Ms. Harris without her consent.

1186. Plaintiff Jacki Harris received medical treatment from Perwaiz at CRMC from on or around 1997 to 2003.

1187. During that time, Perwaiz performed an unnecessary and gynecological surgery on Ms. Harris without her consent.

1188. Plaintiff Jonicia Harris received medical treatment from Perwaiz at CRMC from in or around February 2017 to on or around August 20, 2019.

1189. During this time, when Ms. Harris was pregnant, Perwaiz induced her labor untimely and unnecessarily and without her informed consent.

1190. Perwaiz also performed an unnecessary and uninformed gynecologic procedure on Ms. Harris without her consent.

1191. Plaintiff Keosha Harris received medical treatment from Perwaiz at CRMC from around 2014 to around 2019.

1192. From around 2014 to around 2018, Perwaiz performed untimely unnecessary and uninformed Cesarean sections and dilation and curettage surgeries on Ms. Harris without her consent

1193. Plaintiff Nakeisha Harris received medical treatment from Perwaiz at CRMC in or around 1998.

1194. In or around 1998, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Harris without her consent.

1195. Plaintiff Patricia Harris received medical treatment from Perwaiz at CRMC from on or around 1980 to 1984.

1196. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Harris without her consent.

1197. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Harris without her consent.

1198. Plaintiff Valerie Harris received medical treatment from Perwaiz at CRMC from around 2000 to 2016.

1199. Plaintiff Amber Hartwig received medical treatment from Perwaiz at CRMC from around 2011 to around 2019.

1200. In or around 2018, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Hartwig without her consent.

1201. During that time, Perwaiz performed an unnecessary and uninformed cystectomy on Ms. Hartwig without her consent.

1202. Plaintiff Latasha Hay received medical treatment from Perwaiz at CRMC from around 2011 to around October 2018.

1203. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages and LEEP procedures on Ms. Hay without her consent.

1204. Plaintiff Megan Hecker received medical treatment from Perwaiz at CRMC from around 2002 to around 2018.

1205. From around 2002 to around 2015, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Hecker, including a Cesarean section without her consent.

1206. Plaintiff Quanika Henderson received medical treatment from Perwaiz at CRMC in or around 2019.

1207. In or around 2019, Perwaiz performed an untimely, unnecessary and uninformed Cesarean section on Ms. Henderson without her consent.

1208. Plaintiff Mary Hill received medical treatment from Perwaiz at CRMC from around 2001 to on or around June 1, 2019.

1209. On or around June 1, 2019, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hill without her consent.

1210. Plaintiff Sonya Hill received medical treatment from Perwaiz at CRMC on or around 2009.

1211. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Hill without her consent.

1212. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hill without her consent.

1213. Plaintiff Kim Hines received medical treatment from Perwaiz at CRMC from on or around 1987 to 2003.

1214. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Hines without her consent.

1215. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hines without her consent.

1216. Plaintiff Toletta Hines received medical treatment from Perwaiz at CRMC from on or around 2002 to 2010.

1217. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Hines without her consent.

1218. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hines without her consent.

1219. Plaintiff Arkayla Hinton received medical treatment from Perwaiz at CRMC from around 2018 to around June 2019.

1220. In or around June 2019, Perwaiz performed an unnecessary and uninformed gynecologic procedure on Ms. Hinton without her consent.

1221. Plaintiff Toniya Hofler received medical treatment from Perwaiz at CRMC from around the summer of 2016 to around 2018.

1222. In or around the summer of 2016, Perwaiz performed an unnecessary and uninformed ovarian cyst removal procedure on Ms. Hofler without her consent.

1223. Plaintiff Jaquesha Holley received medical treatment from Perwaiz at CRMC from around 2006 to around October 2019.

1224. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Holley without her consent.

1225. Plaintiff Brenda Holloway received medical treatment from Perwaiz at CRMC from on or around 2009 to 2013.

1226. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Holloway without her consent.

1227. Plaintiff Dracena Holloway received medical treatment from Perwaiz at CRMC in or around 2002 to 2018.

1228. During this time, Perwaiz performed a tumor removal procedure on Ms. Holloway unnecessarily or without her informed consent.

1229. During this time, Perwaiz performed multiple gynecological surgeries on Ms. Holloway unnecessarily or without her informed consent.

1230. In 2006 Dr. Perwaiz induced Ms. Holloway's labor early and her child was sent to the NICU and her child has developmental delays.

1231. In 2008, Dr Perwaiz induced Ms. Holloway's labor early and her child was sent to the NICU and her child has developmental delays.

1232. In 2009, Dr. Perwaiz induced Ms. Holloway's labor early and her child was sent to the NICU and has developmental delays.

1233. In 2011, Dr. Perwaiz performed a tubal ligation when she was just 27 years old without her knowledge or informed consent during a c-section.

1234. In 2014, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Holloway for uterine fibroids when she did not have any uterine fibroids.

1235. In 2018, Perwaiz performed a "tumor removal" from her abdominal wall on Ms. Holloway informing her she had cancer when she did not.

1236. In 2019, Perwaiz performed a lysis of adhesions on Ms. Holloway due to the excessive scar tissue caused by his multiple unnecessary gynecological surgeries.

1237. Plaintiff Sheila Holloway received medical treatment from Perwaiz at CRMC from around 2001 to around 2006.

1238. During that time, Perwaiz performed unnecessary and uninformed surgeries to remove “tumors” on Ms. Holloway without her consent.

1239. Plaintiff Tiffany Holloway received medical treatment from Perwaiz at CRMC from on or around 2003 to 2007.

1240. During that time, Perwaiz performed an unnecessary and uninformed breast biopsy on Ms. Holloway without her consent.

1241. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Holloway without her consent.

1242. Plaintiff Kimberly Holmes received medical treatment from Perwaiz at CRMC in or around 2008.

1243. In or around 2008, Perwaiz performed an unnecessary and uninformed cystectomy on Ms. Holmes without her consent.

1244. Plaintiff Tanika Holmes received medical treatment from Perwaiz at CRMC from around 2003 to around 2011.

1245. During this time, Perwaiz performed an unnecessary and uninformed LEEP surgery on Ms. Holmes without her consent.

1246. Plaintiff Kenya Horton received medical treatment from Perwaiz at CRMC on or around 2014.

1247. During that time, Perwaiz performed multiple unnecessary and uninformed surgery for cancer she never had on Ms. Horton without her consent.

1248. Plaintiff Katrina House received medical treatment from Perwaiz at CRMC on or around 2015.

1249. Plaintiff Andrea Houston received medical treatment from Perwaiz at CRMC from on or around 1989 to 1996.

1250. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Houston without her consent.

1251. Plaintiff Stephanie Houston received medical treatment from Perwaiz at CRMC from on or around 1984 to 1986.

1252. During that time, Perwaiz performed multiple unnecessary and uninformed surgeries for cancer she never had on Ms. Houston without her consent.

1253. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Houston without her consent.

1254. Plaintiff Shanell Howard received medical treatment from Perwaiz at CRMC from around 2013 to around 2015.

1255. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Howard without her consent.

1256. Plaintiff Antoinette Howell received medical treatment from Perwaiz at CRMC from on or around 2005 to 2006.

1257. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Howell without her consent.

1258. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Howell without her consent.

1259. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Howell without her consent.

1260. Plaintiff Victoria Howell received medical treatment from Perwaiz at CRMC from on or around November 14, 2017, to around May 2018.

1261. In or around 2017, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Howell without her consent.

1262. Plaintiff Conchita Hoyett received medical treatment from Perwaiz at CRMC in or around 1996 to 1997.

1263. During that time, Perwaiz performed an unnecessary and uninformed early induction and episiotomy on Ms. Hoyett without her consent.

1264. In or around 1997, Perwaiz performed unnecessary and uninformed surgeries on Ms. Hoyett without her consent.

1265. Plaintiff Amanda Huerta received medical treatment from Perwaiz at CRMC from on or around 1998 to 2001.

1266. Plaintiff Shanell Hughes received medical treatment from Perwaiz at CRMC from around September 1998 to around October 2017.

1267. During this time, Perwaiz performed multiple unnecessary and uninformed gynecologic procedures on Ms. Hughes without her consent.

1268. In or around September 2017, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hughes without her consent.

1269. Plaintiff Chelsey Hunt received medical treatment from Perwaiz at CRMC on or around 2014.

1270. During that time, Perwaiz performed multiple unnecessary and uninformed LEEP procedures on Ms. Hunt without her consent.

1271. Plaintiff Jacqueline S. Hurdle received medical treatment from Perwaiz at CRMC from on or around 2015.

1272. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Hurdle without her consent.

1273. Plaintiff Tonia Hurdle received medical treatment from Perwaiz at CRMC from around 1994 to around 2018.

1274. Plaintiff Ashley Hurst received medical treatment from Perwaiz at CRMC from in or around 2010 to 2018.

1275. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Hurst without her consent.

1276. During that time, Perwaiz performed multiple unnecessary and uninformed laparoscopic surgeries on Ms. Hurst without her consent.

1277. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hurst without her consent.

1278. Perwaiz also performed an unnecessary and uninformed cone biopsy procedure on Ms. Hurst, removing a cone-shaped piece of tissue from the cervix without her consent.

1279. On or around November 24, 2018, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hurst.

1280. Plaintiff Virginia Hurst received medical treatment from Perwaiz at CRMC on or around 2004.

1281. During that time, Perwaiz performed an unnecessary and uninformed gynecological surgery on Ms. Hurst without her consent.

1282. Plaintiff Tanisha Hyman received medical treatment from Perwaiz at CRMC in or around 2019.

1283. In or around February 2019, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Hyman without her consent.

1284. Perwaiz told Ms. Hyman the February 2019 surgery was for ovary removal and tubal flushing.

1285. Plaintiff Talena Hymons received medical treatment from Perwaiz at CRMC from on or around 2005 to 2009.

1286. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Hymons without her consent.

1287. Plaintiff Jeanne Jackson received medical treatment from Perwaiz at CRMC from on or around 1985 to 1987.

1288. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Jackson without her consent.

1289. Plaintiff Linda Jackson received medical treatment from Perwaiz at CRMC from around 2007 to around 2012.

1290. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Jackson without her consent.

1291. Plaintiff Shaunterette Jackson received medical treatment from Perwaiz at CRMC from on or around 2012 to 2014.

1292. During that time, Perwaiz performed an unnecessary and uninformed fibriodectomy on Ms. Jackson without her consent.

1293. During that time, Perwaiz performed an unnecessary and uninformed cystectomy on Ms. Jackson without her consent.

1294. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Jackson without her consent.

1295. Plaintiff Belinda James received medical treatment from Perwaiz at CRMC from around September 2018 to around November 2018.

1296. In or around November 2018, Perwaiz performed an unnecessary and uninformed full hysterectomy on Ms. James, removing her ovaries, uterus, and fallopian tubes because of purported tumors.

1297. Plaintiff Mary James received medical treatment from Perwaiz at CRMC from on or around 1982 to 1984.

1298. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. James without her consent.

1299. Plaintiff Leslie Jefferson received medical treatment from Perwaiz at CRMC from on or around 1993 to 2014.

1300. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Jefferson without her consent.

1301. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Corprew without her consent.

1302. Plaintiff JaCynthia Jenkins received medical treatment from Perwaiz at CRMC from around October 2008 to around February 2018.

1303. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Jenkins without her consent.

1304. During that time, Perwaiz performed an unnecessary and uninformed lysis of adhesions on Ms. Jenkins without her consent.

1305. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Jenkins without her consent.

1306. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Jenkins without her consent.

1307. Plaintiff Kierra Johnson received medical treatment from Perwaiz at CRMC from on or around September 10, 2006, to around October 2019.

1308. From around 2007 to around February 2018, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Johnson without her consent.

1309. Plaintiff Lafesha Johnson received medical treatment from Perwaiz at CRMC from around 2014 to around 2017.

1310. Plaintiff Latoya Johnson received medical treatment from Perwaiz at CRMC from around 2005 to 2009.

1311. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Johnson without her consent.

1312. Plaintiff Tabitha Johnson received medical treatment from Perwaiz at CRMC from on or around October 6, 2006, to around 2016.

1313. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Johnson without her consent.

1314. Additionally, Perwaiz removed half of Ms. Johnson's uterus in another unnecessary and uninformed surgery without her consent.

1315. Plaintiff Ashley Jones received medical treatment from Perwaiz at CRMC from around 2007 to around 2017.

1316. In or around 2016, Perwaiz performed two unnecessary and uninformed gynecologic surgeries on Ms. Jones without her consent, leaving her unable to conceive.

1317. During this time, Perwaiz performed an unnecessary and uninformed early induction of labor of Ms. Jones without her consent.

1318. During this time, Perwaiz performed an untimely, unnecessary and uninformed c-section of Ms. Jones without her consent.

1319. Plaintiff Christine Jones received medical treatment from Perwaiz at CRMC on or around 2001.

1320. During that time, Perwaiz performed an unnecessary and uninformed gynecological surgery on Ms. Jones without her consent informing her she had cancer when she did not.

1321. Plaintiff Dinah Jones received medical treatment from Perwaiz at CRMC from around 1984 to around 2000.

1322. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Jones without her consent after informing her she had cancer when she did not.

1323. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Jones without her consent after informing her she had cancer when she did not.

1324. Plaintiff Linda Jones received medical treatment from Perwaiz at CRMC from on or around 2012 to 2015.

1325. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Jones without her consent.

1326. Plaintiff Sharnette Jordan received medical treatment from Perwaiz at CRMC from around 2012 to around 2019.

1327. In or around 2019, Perwaiz performed an unnecessary and uninformed full hysterectomy on Ms. Jordan without her consent.

1328. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Jordan without her consent.

1329. Plaintiff Tambra Jordan received medical treatment from Perwaiz at CRMC from on or around 2006 to 2014.

1330. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Jordan without her consent for a sexually transmitted disease she never had.

1331. Plaintiff Latvauia Joyner received medical treatment from Perwaiz at CRMC from around September 2013 to around December 2015.

1332. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Joyner without her consent.

1333. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Corprew without her consent.

1334. Plaintiff Carla Justice received medical treatment from Perwaiz at CRMC from on or around 1991 to 2009.

1335. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Justice without her consent.

1336. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Justice without her consent.

1337. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Justice without her consent.

1338. Plaintiff Laurie Kascek received medical treatment from Perwaiz at CRMC on or around 2002.

1339. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Kascek without her consent.

1340. During that time, Perwaiz performed an unnecessary and uninformed appendectomy (which is outside the scope of an OB/GYN) on Ms. Kascek without her consent.

1341. Plaintiff Cassandra Kawalsingh received medical treatment from Perwaiz at CRMC from around 2018 to around 2019.

1342. Plaintiff Elizabeth Kellogg received medical treatment from Perwaiz at CRMC from around 2017 to around 2018.

1343. In or around 2017, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Kellogg without her consent.

1344. On or around June 30, 2018, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Kellogg.

1345. Plaintiff Brittany Kelly received medical treatment from Perwaiz at CRMC from around 2008 to around 2012.

1346. During that time, Perwaiz performed an unnecessary and uninformed gynecological surgery on Ms. Kelly without her consent.

1347. Plaintiff Shante Kindred received medical treatment from Perwaiz at CRMC from around 2017 to around 2019.

1348. During this time, Perwaiz performed unnecessary and uninformed dilation and curettage surgeries on Ms. Kindred without her consent.

1349. In or around September 2017, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Kindred without her consent.

1350. In or around 2017, Perwaiz performed unnecessary and uninformed procedures to remove polyps on Ms. Kindred without her consent.

1351. Plaintiff Shelley M. Koehl received medical treatment from Perwaiz at CRMC around 2007.

1352. During this time, Perwaiz performed unnecessary and uninformed early induction of labor on Ms. Koehl without her consent.

1353. Plaintiff Angel Land received medical treatment from Perwaiz at CRMC from on or around 2012 to 2014.

1354. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Land without her consent.

1355. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Land without her consent.

1356. Plaintiff Temeka Langston received medical treatment from Perwaiz at CRMC from around 2005 to around 2019.

1357. Plaintiff Natalie Lawrence received medical treatment from Perwaiz at CRMC from on or around 2009 to 2010.

1358. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Lawrence without her consent.

1359. Plaintiff Rebecca Lawson received medical treatment from Perwaiz at CRMC from on or around 2006 to 2016.

1360. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Lawson without her consent.

1361. Plaintiff Shannon Leahy received medical treatment from Perwaiz at CRMC from on or around 2007 to 2008.

1362. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages and gynecological surgeries on Ms. Leahy without her consent.

1363. Plaintiff Frances Juanita Lee received medical treatment from Perwaiz at CRMC from around 1986 to around 2019.

1364. During that time, Perwaiz performed an unnecessary and uninformed partial hysterectomy on Ms. Lee without her consent.

1365. During that time, Perwaix performed an unnecessary and uninformed total hysterectomy on Ms. Lee without her consent.

1366. Plaintiff Kenesha Lee received medical treatment from Perwaiz at CRMC from on or around 2007 to 2008.

1367. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Lee without her consent.

1368. Plaintiff Charlene Leibrand received medical treatment from Perwaiz at CRMC from around 1981 to around 2016.

1369. During this time, Perwaiz performed approximately twenty-five unnecessary and uninformed gynecologic procedures on Ms. Leibrand, including a corrective surgery in or around November 2016.

1370. Plaintiff Carol Lewis received medical treatment from Perwaiz at CRMC from around 1988 to around 1989.

1371. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Lewis without her consent.

1372. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Lewis without her consent.

1373. Plaintiff Nia Lissimore received medical treatment from Perwaiz at CRMC from around 2008 to around 2019.

1374. On or around March 18, 2017, Perwaiz performed an unnecessary and uninformed laparoscopy, lysis of adhesions, laser ablation of vaginal wall and cervix, left cyst removal, dilation and curettage surgery, and tubal lavage on Ms. Lissimore without her consent.

1375. On or around August 2, 2018, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Lissimore without her consent.

1376. On or around July 17, 2019, Perwaiz performed an ultrasound on Ms. Lissimore and recommended surgery, but she refused.

1377. Plaintiff Nancy Little received medical treatment from Perwaiz at CRMC from around 2015 to around 2017.

1378. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Little without her consent.

1379. Plaintiff Amber Locklear received medical treatment from Perwaiz at CRMC from around August 2019 to around October 2019.

1380. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Locklear without her consent.

1381. Plaintiff Jeannette Logan received medical treatment from Perwaiz at CRMC from on or around 2002 to 2003.

1382. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Logan without her consent.

1383. Plaintiff Brenda Long received medical treatment from Perwaiz at CRMC from on or around 1993 to around 2005.

1384. During this time, Perwaiz performed an unnecessary and uninformed laser surgery on Ms. Long for cancer she never had without her consent.

1385. Plaintiff Tacorra Long received medical treatment from Perwaiz at CRMC from around December 2016 to around 2018.

1386. On or around August 19, 2017, Perwaiz performed an unnecessary and uninformed gynecologic surgery on Ms. Long without her consent.

1387. Plaintiff Nicole Luckett received medical treatment from Perwaiz at CRMC from on or around 2009 to 2010.

1388. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Luckett without her consent.

1389. Plaintiff Zignia Lugo received medical treatment from Perwaiz at CRMC in or around November 2019.

1390. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Lugo without her consent.

1391. Plaintiff Celes Lynch received medical treatment from Perwaiz at CRMC from around 2018 to around March 2019.

1392. On or around March 2, 2019, when Ms. Lynch was pregnant, Perwaiz induced her labor early unnecessarily or without informed consent.

1393. Plaintiff Cindy Lytle received medical treatment from Perwaiz at CRMC from around January 1995 to around October 2016.

1394. During this time, Perwaiz performed multiple dilation and curettage surgeries and cone biopsies on Ms. Lytle without her consent.

1395. During this time, Perwaiz performed a laparoscopy surgery on Ms. Lytle without her consent for cancer she never had.

1396. Plaintiff Brandy Maas received medical treatment from Perwaiz at CRMC in or around 2018.

1397. Plaintiff Beth MacPherson received medical treatment from Perwaiz at CRMC in or around 2008.

1398. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. MacPherson without her consent.

1399. Plaintiff Tylia Madison received medical treatment from Perwaiz at CRMC from around 2016 to around 2019.

1400. In or around October 2019, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Madison without her consent.

1401. Plaintiff Angie Manley received medical treatment from Perwaiz at CRMC from around 2000.

1402. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Manley without her consent for cancer she never had.

1403. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Manley without her consent.

1404. Plaintiff Sheena Manning received medical treatment from Perwaiz at CRMC on or around 2005.

1405. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor, c-section and cystectomy on Ms. Manning without her consent.

1406. Plaintiff Ashley Marcotte received medical treatment from Perwaiz at CRMC from around 2013 to around August 2017.

1407. In or around May 2017, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Marcotte without her consent.

1408. Plaintiff Bianca Marks received medical treatment from Perwaiz at CRMC from on or around 2011 to 2014.

1409. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Marks without her consent.

1410. Plaintiff Jenny Marks received medical treatment from Perwaiz at CRMC from around December 14, 2017, to around July 1, 2018.

1411. During this time, when Ms. Marks was pregnant, Perwaiz induced her labor unnecessarily or without informed consent, necessitating surgical repair in 2024.

1412. Plaintiff Jennifer Martell received medical treatment from Perwaiz at CRMC in or around 1997.

1413. In or around 1997, Perwaiz performed an untimely, unnecessary and uninformed induction of labor and episiotomy on Ms. Martell without her consent.

1414. Plaintiff Diamond Martin received medical treatment from Perwaiz at CRMC in or around 2022.

1415. Plaintiff Jacqueline Martin received medical treatment from Perwaiz at CRMC from on or around 2008 to 2012.

1416. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Martin without her consent.

1417. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Martin without her consent.

1418. Plaintiff Lenore Mathis received medical treatment from Perwaiz at CRMC from on or around 2006 to 2012.

1419. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Mathis without her consent.

1420. During that time, Perwaiz performed multiple unnecessary and uninformed cyst drainages on Ms. Mathis without her consent.

1421. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Mathis without her consent.

1422. Plaintiff Shanda Mathis received medical treatment from Perwaiz at CRMC from around 2005 to around 2015.

1423. Plaintiff Shakena Matthews received medical treatment from Perwaiz at CRMC from around 2013 to around 2016.

1424. On or around December 17, 2016, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Matthews without her consent.

1425. Plaintiff Lamonica Mayo received medical treatment from Perwaiz at CRMC from on or around 2005 to 2008.

1426. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Mayo without her consent.

1427. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Mayo without her consent.

1428. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Mayo without her consent.

1429. Plaintiff Keona McCall received medical treatment from Perwaiz at CRMC from around 2015 to around 2016.

1430. During this time, Perwaiz performed two unnecessary and uninformed tubal ligations on Ms. McCall without her consent.

1431. During this time, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on McCall without her consent.

1432. On or around June 23, 2016, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. McCall without her consent.

1433. Plaintiff Kathleen McDonald received medical treatment from Perwaiz at CRMC on or around 2005.

1434. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. McDonald without her consent.

1435. Plaintiff Tanya McInnis received medical treatment from Perwaiz at CRMC from on or around 1993 to 2010.

1436. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. McInnis without her consent.

1437. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. McInnis without her consent.

1438. Plaintiff Yolanda McKenzie received medical treatment from Perwaiz at CRMC from around January 2003 to around 2019.

1439. During this time, Perwaiz performed multiple unnecessary and uninformed back-to-back dilation and curettage surgeries on Ms. McKenzie without her consent.

1440. Plaintiff Sonya Medlin received medical treatment from Perwaiz at CRMC from on or around 1983 to 2000.

1441. During that time, Perwaiz performed unnecessary and uninformed gynecological surgery on Ms. Medlin's labia without her consent.

1442. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Medlin without her consent.

1443. Plaintiff Erica Mercer received medical treatment from Perwaiz at CRMC from on or around 2003 to 2019.

1444. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Merce without her consent.

1445. During that time, Perwaiz performed multiple unnecessary and uninformed laparoscopies on Ms. Mercer without her consent.

1446. Plaintiff Traci Milburn received medical treatment from Perwaiz at CRMC in or around 2019.

1447. During this time, Perwaiz performed an unnecessary and uninformed surgery on Ms. Milburn to remove a tumor without her consent.

1448. Plaintiff Melissa Mildrum received medical treatment from Perwaiz at CRMC from around January 2018 to around August 2018.

1449. On or around August 19, 2018, Perwaiz performed an unnecessary and uninformed induction and Cesarean section on Ms. Mildrum without her consent.

1450. Plaintiff Bettye Miles received medical treatment from Perwaiz at CRMC in or around 2019.

1451. In or around August or September of 2019, Perwaiz performed an unnecessary and uninformed procedure to remove Ms. Miles' uterus without her consent.

1452. Before the 2019 operation, Ms. Miles believed she was undergoing surgery for an endocervical curettage.

1453. Ms. Miles later learned Perwaiz removed her uterus.

1454. Plaintiff Jessica Miller received medical treatment from Perwaiz at CRMC on or around 2010.

1455. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Miller without her consent.

1456. Plaintiff Carmen Stephenson Mitchell received medical treatment from Perwaiz at CRMC from on or around 2000 to 2012.

1457. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Mitchell without her consent.

1458. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Mitchell without her consent.

1459. During that time, Perwaiz performed two untimely, unnecessary and uninformed c-sections on Ms. Mitchell without her consent.

1460. Plaintiff Katrina Mitchell received medical treatment from Perwaiz at CRMC from around 2010 to around December 2018.

1461. Around 2013 to around 2017, Perwaiz performed two unnecessary and uninformed dilation and curettage surgeries on Ms. Mitchell for purported cysts without her consent.

1462. Plaintiff Bianca Moise received medical treatment from Perwaiz at CRMC in or around 2009 to 2011.

1463. During that time, Perwaiz performed an unnecessary and uninformed dilation and curettages and tubal ligations on Ms. Moise without her consent.

1464. Plaintiff Juliza Moody received medical treatment from Perwaiz at CRMC in or around the summer of 2019.

1465. Plaintiff Sigrid Moore received medical treatment from Perwaiz at CRMC from around 2011 to around 2016.

1466. During that time, Perwaiz performed unnecessary and uninformed gynecological surgeries on Ms. Moore without her consent.

1467. Plaintiff Alexis Moores received medical treatment from Perwaiz at CRMC from around 2015 to around January 2020.

1468. During this time, Perwaiz performed an unnecessary and uninformed LEEP on Ms. Moores without her consent.

1469. In or around 2017, Perwaiz also performed an unnecessary and uninformed tubal surgery on Ms. Moores without her consent.

1470. Plaintiff Ebony Morgan received medical treatment from Perwaiz at CRMC from around November 2009 to around June 2017.

1471. Between around 2012 and around 2016, Perwaiz performed two unnecessary and uninformed gynecologic surgeries on Ms. Morgan to remove scar tissue without her consent.

1472. In or around 2017, Perwaiz recommended Ms. Morgan undergo a third scar removal surgery.

1473. Ms. Morgan received a second opinion and declined the third scar tissue removal surgery.

1474. Plaintiff Mary Morrow received medical treatment from Perwaiz at CRMC from on or around 2007 to 2009.

1475. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor and c-section on Ms. Morrow without her consent.

1476. Plaintiff Nancy Mosteller received medical treatment from Perwaiz at CRMC from on or around 1985 to 2007.

1477. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Mosteller without her consent.

1478. Plaintiff Lameka Mull received medical treatment from Perwaiz at CRMC from on or around 2008 to 2012.

1479. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Mull without her consent.

1480. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Mull without her consent.

1481. Plaintiff Niki Murry received medical treatment from Perwaiz at CRMC from on or around 2008 to 2012.

1482. During that time, Perwaiz performed an unnecessary and uninformed dilation and curettage on Ms. Murry without her consent.

1483. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor and emergency c-section on Ms. Murry without her consent.

1484. Plaintiff April Neville received medical treatment from Perwaiz at CRMC from around June 17, 2007 to around July 3, 2016.

1485. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Neville without her consent.

1486. Plaintiff Mary Nichols received medical treatment from Perwaiz at CRMC from around 2018 to around 2019.

1487. During this time, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Nichols without her consent.

1488. On or around June 1, 2019, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Nichols without her consent

1489. Plaintiff Courtney Nipper received medical treatment from Perwaiz at CRMC from around 2009 to around 2019.

1490. During this time, Perwaiz performed regular dilation and curettage surgeries on Ms. Nipper unnecessarily or without her informed consent.

1491. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Nipper without her consent.

1492. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor and c-section on Ms. Nipper without her consent.

1493. Plaintiff Lanadia Nora received medical treatment from Perwaiz at CRMC from around 2016 to around 2019.

1494. During this time, Perwaiz performed three unnecessary and uninformed surgeries on Ms. Nora to remove purported cysts without her consent.

1495. Plaintiff Vanette Norfleet received medical treatment from Perwaiz at CRMC in or around 2019.

1496. Plaintiff Jazmin Norman received medical treatment from Perwaiz at CRMC from on or around 2006 to 2015.

1497. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Norman without her consent.

1498. Plaintiff Lillian Norman received medical treatment from Perwaiz at CRMC from on or around 1987.

1499. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Norman without her consent.

1500. Plaintiff Georgia Obenaus received medical treatment from Perwaiz at CRMC from on or around 1989 to 2006.

1501. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Obenaus without her consent.

1502. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Obenaus without her consent.

1503. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Obenaus without her consent.

1504. Plaintiff Meghan O'Brien received medical treatment from Perwaiz at CRMC from on or around 1999 to 2017.

1505. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. O'Brien without her consent.

1506. Plaintiff Bianca Odom received medical treatment from Perwaiz at CRMC in or around 2003 to 2012.

1507. During that time, Perwaiz performed an unnecessary and uninformed dilation and curettages on Ms. Odom.

1508. Plaintiff Brittany Odom received medical treatment from Perwaiz at CRMC in or around 2019.

1509. During that time, Perwaiz performed unnecessary and uninformed gynecological surgeries on Ms. Odom without her consent.

1510. Plaintiff Sharita Parker received medical treatment from Perwaiz at CRMC from on or around 2003 to 2012.

1511. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Parker without her consent.

1512. Plaintiff Shylisle Patterson received medical treatment from Perwaiz at CRMC from on or around 1988 to 2004.

1513. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Patterson without her consent.

1514. Plaintiff Jimmell Peele received medical treatment from Perwaiz at CRMC from on or around 1999.

1515. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Peele without her consent.

1516. Plaintiff Paula Kay Perry received medical treatment from Perwaiz at CRMC in or around 1988.

1517. During this time, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery and a subsequent unnecessary and uninformed polyp removal surgery on Ms. Perry after falsely advising Ms. Perry she had cancer when she did not.

1518. Plaintiff Latrice Pierce received medical treatment from Perwaiz at CRMC from on or around 2007 to 2010.

1519. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Pierce without her consent.

1520. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Pierce without her consent.

1521. Plaintiff Tiffany Pierre received medical treatment from Perwaiz at CRMC from on or around 2002 to 2011.

1522. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries and breast biopsies on Ms. Pierre without her consent.

1523. Plaintiff Lucinia Plummer received medical treatment from Perwaiz at CRMC from around January 2010 to around December 2015.

1524. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Plummer without her consent.

1525. Plaintiff Yvette Powell received medical treatment from Perwaiz at CRMC from on or around 1998 to 2010.

1526. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Powell without her consent.

1527. Plaintiff Deanna Powers received medical treatment from Perwaiz at CRMC from around 2016 to around 2017.

1528. On or around October 8, 2017, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Powers without her consent.

1529. Plaintiff Wendy Pritchard received medical treatment from Perwaiz at CRMC from around January 18, 2016 to around February 18, 2016.

1530. On or around February 6, 2016, Perwaiz performed an unnecessary and uninformed laparoscopic surgery on Ms. Pritchard to remove purported adhesions, leaving her with a 4-inch scar without her consent.

1531. Plaintiff Trina Quinones received medical treatment from Perwaiz at CRMC from on or around 1999 to 2007.

1532. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries for purported endometriosis on Ms. Quinones without her consent.

1533. During that time, Perwaiz performed an unnecessary and uninformed episiotomy and repair on Ms. Quinones without her consent.

1534. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor, c-section on Ms. Quinones without her consent.

1535. Plaintiff Kimberly Rager received medical treatment from Perwaiz at CRMC on or around 2005.

1536. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Rager without her consent.

1537. Plaintiff Nora Rapada received medical treatment from Perwaiz at CRMC from on or around 1980 to 1999.

1538. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Rapada without her consent.

1539. Plaintiff Porsha Ready received medical treatment from Perwaiz at CRMC from around 2007 to around 2016.

1540. During that time, Perwaiz performed multiple unnecessary and uninformed “HPV screening surgeries” on Ms. Ready without her consent.

1541. During that time, Perwaiz performed untimely, unnecessary and uninformed c-sections on Ms. Ready without her consent.

1542. Plaintiff Jackie Rector received medical treatment from Perwaiz at CRMC in or around 2017.

1543. In or around 2017, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Rector without her consent.

1544. Plaintiff Erica Reed received medical treatment from Perwaiz at CRMC from around November 12, 2006, to around June 1, 2019.

1545. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Reed without her consent.

1546. Plaintiff Keshira Reed received medical treatment from Perwaiz at CRMC from around October 8, 2013 to around September 19, 2016.

1547. Plaintiff Kiyania Reese received medical treatment from Perwaiz at CRMC from on or around 2007 to 2008.

1548. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Reese without her consent after telling her she had cancer and she did not.

1549. Plaintiff Latesha Reese received medical treatment from Perwaiz at CRMC on or around 2015.

1550. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Reese without her consent.

1551. Plaintiff Monique Reese received medical treatment from Perwaiz at CRMC from or around 2009 to 2019.

1552. Plaintiff Denise Reid received medical treatment from Perwaiz at CRMC from on or around 2014 to 2019.

1553. Plaintiff Erica Reid received medical treatment from Perwaiz at CRMC from around August 1, 2003 to around July 21, 2019.

1554. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Reid without her consent.

1555. Plaintiff Patricia Renfrow received medical treatment from Perwaiz at CRMC from on or around 1990 to 2000.

1556. During that time, Perwaiz performed unnecessary and uninformed right oophorectomy on Ms. Renfrow without her consent at age 18.

1557. During that time, Perwaiz performed an unnecessary and uninformed removal of fallopian tube on Ms. Renfrow without her consent shortly thereafter.

1558. Plaintiff Ceira Reynolds received medical treatment from Perwaiz at CRMC from around 2012 to around 2017.

1559. In or around March 2016, when Ms. Reynolds was pregnant, Perwaiz performed an unnecessary and uninformed induction and Cesarean section on Ms. Reynolds.

1560. Again, in or around April 2017, when Ms. Reynolds was pregnant, Perwaiz performed an unnecessary and uninformed induction and Cesarean section on Ms. Reynolds.

1561. Plaintiff Faijer Rhodes received medical treatment from Perwaiz at CRMC from on or around 2018.

1562. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Rhodes without her consent.

1563. Plaintiff Pamela Rhodes received medical treatment from Perwaiz at CRMC on or around 2002.

1564. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy and bladder lift on Ms. Rhodes without her consent.

1565. Plaintiff Asia Richards received medical treatment from Perwaiz at CRMC from around January 1, 2013, to around May 16, 2019.

1566. During this time, when Ms. Richards was pregnant, Perwaiz induced her labor unnecessarily or without informed consent.

1567. Plaintiff Christy Riddick received medical treatment from Perwaiz at CRMC from around 2007.

1568. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Riddick without her consent.

1569. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Riddick without her consent.

1570. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Riddick without her consent.

1571. Plaintiff Sherry Riddick received medical treatment from Perwaiz at CRMC from around 2000 to 2014.

1572. Plaintiff Joi Rivera received medical treatment from Perwaiz at CRMC on or around 2009 .

1573. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Rivera without her consent.

1574. Plaintiff Sade Rivera received medical treatment from Perwaiz at CRMC from around 2010 to around October 1, 2017.

1575. In or around 2017, Perwaiz performed an unnecessary and uninformed cyst removal surgery and tubal ligation on Ms. Rivera without consent.

1576. At the time of these surgeries, Ms. Rivera was 22 years old.

1577. Plaintiff Sharonda Robinson received medical treatment from Perwaiz at CRMC on or around 2010.

1578. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Robinson without her consent.

1579. Plaintiff Vontrese Rodgers received medical treatment from Perwaiz at CRMC from on or around 1999 to 2000.

1580. During that time, Perwaiz performed multiple unnecessary and uninformed cysts on Ms. Rodgers without her consent.

1581. During that time, Perwaiz performed an unnecessary and uninformed cholecystectomy (outside the scope of an OB/GYN) on Ms. Rodgers without her consent.

1582. Plaintiff Sandra Rowe received medical treatment from Perwaiz at CRMC on or around 2010.

1583. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Rowe without her consent.

1584. Plaintiff Summer Ruff received medical treatment from Perwaiz at CRMC on or around 2004.

1585. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Ruff without her consent.

1586. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Ruff without her consent.

1587. During that time, Perwaiz performed an unnecessary and uninformed hysteroscopy on Ms. Ruff without her consent.

1588. Plaintiff Maisha Rumble received medical treatment from Perwaiz at CRMC from on or around 2004 to 2010.

1589. During that time, Perwaiz performed multiple unnecessary and uninformed cyst drainage procedures on Ms. Rumble without her consent.

1590. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor and c-section on Ms. Rumble without her consent.

1591. Plaintiff Janell Sabir received medical treatment from Perwaiz at CRMC on or around 2002.

1592. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation and mole removal from the left of Ms. Sabir without her consent.

1593. Plaintiff Jessica Sage received medical treatment from Perwaiz at CRMC from around 2012 to around 2019.

1594. During this time, Perwaiz performed unnecessary and uninformed cyst removal surgeries on Ms. Sage yearly without her consent.

1595. During this time, Perwaiz performed unnecessary and uninformed hysterectomy on Ms. Sage without her consent.

1596. Plaintiff Melissa Salyers received medical treatment from Perwaiz at CRMC from on or around 1985 to 1992.

1597. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Salyers without her consent.

1598. Plaintiff Gia Sams received medical treatment from Perwaiz at CRMC from on or around 1990 to 1993.

1599. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Sams without her consent.

1600. Plaintiff Debra Satterwhite received medical treatment from Perwaiz at CRMC from on or around 2000 to 2019.

1601. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Satterwhite without her consent.

1602. Plaintiff Nadasha Satterwhite received medical treatment from Perwaiz at CRMC from on or around 2007 to 2012.

1603. During that time, Perwaiz performed multiple unnecessary and uninformed surgeries on Ms. Satterwhite without her consent for cancer she never had.

1604. Plaintiff Wadiya Saunders received medical treatment from Perwaiz at CRMC from or around 1996 to 2019.

1605. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Saunders without her consent.

1606. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Saunders without her consent.

1607. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Saunders without her consent.

1608. Plaintiff Crystal Scarborough received medical treatment from Perwaiz at CRMC from around 2008 to around October 2009.

1609. During that time, Perwaiz performed an unnecessary and uninformed early induction of labor and c-section on Ms. Scarborough without her consent.

1610. Plaintiff Chanta Scott received medical treatment from Perwaiz at CRMC from around September 2018 to around October 2018.

1611. On or around September 1, 2018, Perwaiz performed an unnecessary and uninformed fibroid removal surgery on Ms. Scott without her consent.

1612. Plaintiff Chevonda Scott received medical treatment from Perwaiz at CRMC in or around 2010 to on or around 2014.

1613. During that time, Perwaiz performed multiple unnecessary and uninformed biopsies on Ms. Chevonda Scott without her consent.

1614. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Chevonda Scott without her consent.

1615. Plaintiff Denise Scott received medical treatment from Perwaiz at CRMC from on or around 2009 to 2013.

1616. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Scott without her consent.

1617. Plaintiff Diana Scott received medical treatment from Perwaiz at CRMC in or around 2014.

1618. During this time, Perwaiz performed multiple unnecessary and uninformed gynecologic procedures on Ms. Scott, including cystectomies and reversal of a tubal ligation.

1619. Plaintiff Kiana Scott received medical treatment from Perwaiz at CRMC from around 2007 to around 2017.

1620. In or around 2017, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery and cyst removal surgery on Ms. Scott without her consent.

1621. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation of Ms. Scott without her consent.

1622. Since this surgery, Ms. Scott has been unable to become pregnant.

1623. Plaintiff Leslie Scott received medical treatment from Perwaiz at CRMC from on or around 2004 to 2005.

1624. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Scott without her consent.

1625. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Scott without her consent.

1626. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor c-section on Ms. Scott without her consent.

1627. Plaintiff Sanesia Scott received medical treatment from Perwaiz at CRMC in or around 1992 to on or around 1997.

1628. During that time, Perwaiz performed multiple unnecessary and uninformed fibroidectomies on Ms. Sanesia Scott without her consent.

1629. Plaintiff Tanika Scott received medical treatment from Perwaiz at CRMC from around 1999 to 2011.

1630. During this time, Perwaiz performed an unnecessary and uninformed ovarian cystectomy on Ms. Scott without her consent.

1631. Plaintiff Tashanda Scott received medical treatment from Perwaiz at CRMC from around June 25, 2010, to around July 14, 2017.

1632. At some point between 2014 and 2016, Perwaiz performed an unnecessary and uninformed cervical procedure on Ms. Scott without her consent.

1633. Plaintiff Shreya Shah received medical treatment from Perwaiz at CRMC in or around November 2016.

1634. In or around September 2016, when Ms. Shah was pregnant, Perwaiz performed an unnecessary and uninformed early induction labor without informed consent.

1635. Plaintiff Kathleen Shapley received medical treatment from Perwaiz at CRMC from around March 1989 to around July 2019.

1636. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Shapley without her consent.

1637. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Shapely without her consent.

1638. In or around 2018, Perwaiz performed an unnecessary and uninformed biopsy on Ms. Shapley without her consent.

1639. Plaintiff Crystal Sharpe received medical treatment from Perwaiz at CRMC from on or around 2003 to 2006.

1640. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Sharpe without her consent for cancer she never had.

1641. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Sharpe without her consent.

1642. Plaintiff Lisa Mounie Shelburne received medical treatment from Perwaiz at CRMC from around September 15, 1986 to around September 15, 2019.

1643. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Shelburne without her consent.

1644. During that time, Perwaiz performed an unnecessary and uninformed loop electrosurgical excisional procedures on Ms. Shelburne without her consent.

1645. During that time, Perwaiz performed an unnecessary and uninformed cervical cerclage on Ms. Shelburne without her consent.

1646. Plaintiff Portia Sheriss received medical treatment from Perwaiz at CRMC from on or around 2007 to 2008.

1647. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Sheriss without her consent.

1648. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor and c-section on Ms. Sheriss without her consent.

1649. Plaintiff Bonita Sherrell received medical treatment from Perwaiz at CRMC in or around 2012.

1650. In or around 2012, Perwaiz performed an unnecessary and uninformed hysterectomy without her consent.

1651. Plaintiff Queen Sherrod received medical treatment from Perwaiz at CRMC from around March 6, 2015 to around October 15, 2019.

1652. During that time, Perwaiz performed multiple unnecessary and uninformed gynecologic surgeries on Ms. Sherrod without her consent.

1653. Plaintiff Summers Shull received medical treatment from Perwaiz at CRMC from around 2017 to around 2019.

1654. In or around 2017, Perwaiz performed an unnecessary and uninformed ovarian cyst removal surgery and hysterectomy on Ms. Shull without her consent.

1655. Plaintiff Brittany Simmons received medical treatment from Perwaiz at CRMC in or around March 2016.

1656. In or around March 2016, Perwaiz performed an unnecessary and uninformed ovarian cyst removal surgery on Ms. Simmons without her consent.

1657. Plaintiff Christina Baker Sinks received medical treatment from Perwaiz at CRMC from on or around 1994 to 2000.

1658. During that time, Perwaiz performed an unnecessary and uninformed breast biopsy on Ms. Sinks without her consent.

1659. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Sinks without her consent.

1660. Plaintiff Tacara Skeeter received medical treatment from Perwaiz at CRMC from on or around 2006 to 2015.

1661. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Skeeter without her consent.

1662. During that time, Perwaiz performed an unnecessary and uninformed gynecological surgeries on Ms. Skeeter without her consent.

1663. Plaintiff Ramona Slayton received medical treatment from Perwaiz at CRMC from on or around 2008 to 2014.

1664. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies, polypectomies and other gynecological procedures on Ms. Slayton without her consent.

1665. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Slayton without her consent.

1666. Plaintiff Jessica Smith received medical treatment from Perwaiz at CRMC from on or around 2000 to 2007.

1667. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Smith without her consent.

1668. Plaintiff Kimberley Smith received medical treatment from Perwaiz at CRMC from around June 2004 to around 2018.

1669. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries (oan organ removal at a time – first right ovary, left ovary, etc) on Ms. Smith without her consent.

1670. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Smith without her consent.

1671. Plaintiff Sandra Smith received medical treatment from Perwaiz at CRMC from on or around 2000 to 2013.

1672. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Smith without her consent.

1673. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Smith without her consent.

1674. Plaintiff Sequoia Smith received medical treatment from Perwaiz at CRMC from on or around 1999 to 2002.

1675. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Smith without her consent.

1676. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Smith without her consent.

1677. Plaintiff Sheila Smith received medical treatment from Perwaiz at CRMC from on or around 1988 to 2010.

1678. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Smith without her consent for cancer she never had.

1679. Plaintiff Aimee Sparling received medical treatment from Perwaiz at CRMC from on or around 2005 to 2006.

1680. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation reversal on Ms. Sparling without her consent.

1681. Plaintiff Yolanda Speight received medical treatment from Perwaiz at CRMC from on or around 2013 to 2014.

1682. During that time, Perwaiz performed multiple unnecessary and uninformed fibroidectomy on Ms. Speight without her consent.

1683. Plaintiff Angel Speller received medical treatment from Perwaiz at CRMC from around 2014 to around 2017.

1684. In or around February 2017, when Ms. Speller was pregnant, Perwaiz induced her labor unnecessarily or without informed consent.

1685. Plaintiff Tawanda Speller received medical treatment from Perwaiz at CRMC from on or around 1996 to 2013.

1686. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Speller without her consent.

1687. Plaintiff Kayla Spence received medical treatment from Perwaiz at CRMC from around 2013 to around 2019.

1688. On or around August 8, 2015, Perwaiz performed an unnecessary and uninformed Cesarean section on Ms. Spence without her consent.

1689. In or around October 2015, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Spence without her consent.

1690. On or around July 17, 2018, Perwaiz performed a second unnecessary and uninformed Caesarean section on Ms. Spence without her consent.

1691. Plaintiff Stacey Spires received medical treatment from Perwaiz at CRMC from on or around 2006 to 2007.

1692. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Spires without her consent.

1693. Plaintiff Wanda Stallings received medical treatment from Perwaiz at CRMC on or around 1996.

1694. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Stallings without her consent.

1695. Plaintiff Katrina Stallins received medical treatment from Perwaiz at CRMC from on or around 2002 to 2005.

1696. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages and mole removal on Ms. Stallins without her consent.

1697. Plaintiff Tina Starks received medical treatment from Perwaiz at CRMC from on or around 2004 to 2005.

1698. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Starks without her consent.

1699. Plaintiff Jennifer Starr received medical treatment from Perwaiz at CRMC from on or around 2002 to 2004.

1700. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Starr without her consent.

1701. Plaintiff Samira Stephens received medical treatment from Perwaiz at CRMC from on or around 2005 to 2006.

1702. During that time, Perwaiz performed multiple unnecessary and uninformed multiple gynecological surgeries on Ms. Corprew without her consent.

1703. Plaintiff Arika Stevens received medical treatment from Perwaiz at CRMC from around 2018 to around 2019.

1704. In or around 2018, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery and laparoscopy procedure on Ms. Stevens to remove any cysts from her ovaries.

1705. Ms. Stevens later learned that Perwaiz only removed one cyst from her ovaries.

1706. Plaintiff April Stokes received medical treatment from Perwaiz at CRMC from on or around 2000 to 2004.

1707. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Stokes without her consent.

1708. Plaintiff Kikia Stokes received medical treatment from Perwaiz at CRMC from on or around 2004 to 2014.

1709. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Stokes without her consent.

1710. Plaintiff Channing Studwell received medical treatment from Perwaiz at CRMC from on or around 2009 to 2018.

1711. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Studwell without her consent.

1712. Plaintiff Parcenette Tan received medical treatment from Perwaiz at CRMC from around September 2017 to around November 2017.

1713. In or around November 2017, Perwaiz performed an unnecessary and uninformed tubal ligation reversal surgery on Ms. Tan.

1714. Plaintiff Shannon Tapscott received medical treatment from Perwaiz at CRMC from around May 28, 2018 to around September 2018.

1715. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Tapscott without her consent.

1716. Plaintiff Gabrielle Taylor received medical treatment from Perwaiz at CRMC from or around 2006 to 2019.

1717. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Taylor without her consent.

1718. During that time, Perwaiz performed multiple unnecessary and uninformed ovarian cystectomies on Ms. Carter without her consent.

1719. Plaintiff Krystal Taylor received medical treatment from Perwaiz at CRMC from on or around 2007 to 2014.

1720. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Taylor without her consent for cancer she never had.

1721. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Taylor without her consent.

1722. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Taylor without her consent.

1723. Plaintiff Madison Taylor received medical treatment from Perwaiz at CRMC from around July 2015 to around 2019.

1724. During this time, Perwaiz performed unnecessary and uninformed dilation and curettage surgeries on Ms. Taylor.

1725. During this time, Perwaiz also removed Ms. Taylor's right fallopian tube unnecessarily or without informed consent.

1726. Plaintiff Tiffany Taylor received medical treatment from Perwaiz at CRMC from around 2017 to around 2018.

1727. During this time, Perwaiz performed at least two unnecessary and uninformed surgeries on Ms. Taylor, including removing cysts and removing her fallopian tube.

1728. During this time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Taylor without her consent.

1729. Plaintiff Brittney Temple received medical treatment from Perwaiz at CRMC in or around 2014 to March 2015.

1730. During that time, Perwaiz performed an untimely and unnecessary and uninformed induction of labor on Ms. Temple without her consent.

1731. Plaintiff Jelisa Terry received medical treatment from Perwaiz at CRMC from around October 1, 2019 to around October 31, 2019.

1732. On or around October 31, 2019, Perwaiz performed an unnecessary and uninformed Cesarean section on Ms. Terry.

1733. Plaintiff Quana Terry received medical treatment from Perwaiz at CRMC in or around 2010.

1734. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation Ms. Terry without her consent.

1735. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Terry without her consent.

1736. Plaintiff Leslie Thomas Harris received medical treatment from Perwaiz at CRMC on or around 1994.

1737. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Thomas Harris without her consent.

1738. Plaintiff April Thomas received medical treatment from Perwaiz at CRMC in or around 2003 to 2004.

1739. During that time, Perwaiz performed an unnecessary and uninformed dilation and curettage on Ms. Thomas without her consent.

1740. Plaintiff Michele Thompson received medical treatment from Perwaiz at CRMC from around 2001 to around 2016.

1741. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Thompson without her consent.

1742. Plaintiff Tre'elle Tolbert received medical treatment from Perwaiz at CRMC from around 2016 to around 2017.

1743. On or around November 23, 2016, Perwaiz performed an unnecessary and uninformed cesarean section on Ms. Tolbert.

1744. Plaintiff Ashley Trotter received medical treatment from Perwaiz at CRMC from around 2010 to around 2018.

1745. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Trotter without her consent.

1746. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-sections on Ms. Trotter without her consent.

1747. Plaintiff Jivonda Tucker received medical treatment from Perwaiz at CRMC from around April 2010 to around 2018.

1748. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Tucker without her consent.

1749. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Tucker without her consent.

1750. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Tucker without her consent.

1751. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Tucker without her consent.

1752. Plaintiff Patsy Tucker received medical treatment from Perwaiz at CRMC on or around 2000.

1753. During that time, Perwaiz performed multiple unnecessary and uninformed breast biopsies on Ms. Tucker without her consent.

1754. Plaintiff Nicole Turner received medical treatment from Perwaiz at CRMC from around June 2001 to around October 2016.

1755. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor and c-section on Ms. Turner without her consent.

1756. Plaintiff Holly Tuten received medical treatment from Perwaiz at CRMC from on or around 1992 to 1997.

1757. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Tuten without her consent.

1758. Plaintiff Tina Twine received medical treatment from Perwaiz at CRMC from on or around 1984 to 1994.

1759. During that time, Perwaiz performed multiple unnecessary and uninformed exploratory surgeries and left oophorectomy on Ms. Twine without her consent.

1760. Plaintiff Chandra Tyson received medical treatment from Perwaiz at CRMC on or around 2010.

1761. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Tyson without her consent.

1762. Plaintiff Heather Umberger received medical treatment from Perwaiz at CRMC from around 1995 to around 2019.

1763. On or around July 15, 2016, Perwaiz performed a surgery to remove cells on Ms. Umberger's vaginal wall unnecessarily or without informed consent.

1764. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Umberger without her consent.

1765. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Umberger without her consent.

1766. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Umberger without her consent.

1767. During that time, Perwaiz performed an unnecessary and uninformed cystectomy and salpingectomy on Ms. Umberger without her consent.

1768. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Umberger without her consent.

1769. Plaintiff Rosalyn Valentine received medical treatment from Perwaiz at CRMC from or around 2010 to 2016

1770. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Valentine without her consent.

1771. Plaintiff Annie Vanthul received medical treatment from Perwaiz at CRMC from on or around 1980 to 2004.

1772. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Vanthul without her consent.

1773. Plaintiff Christian Vaughan received medical treatment from Perwaiz at CRMC on or around 2003.

1774. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Corprew without her consent.

1775. Plaintiff Johnetta Vaughan received medical treatment from Perwaiz at CRMC from on or around 2007 to 2009.

1776. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Vaughan without her consent.

1777. Plaintiff Veronica Vaughan received medical treatment from Perwaiz at CRMC from around August 8, 2001 to around April 16, 2018.

1778. On or around May 6, 2017, Perwaiz performed an unnecessary and uninformed ectopic pregnancy procedure on Ms. Vaughan without her consent.

1779. On or around April 29, 2017, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Vaughan without her consent.

1780. Plaintiff Barbara Vazquez received medical treatment from Perwaiz at CRMC on or around 1986.

1781. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Vazquez without her consent.

1782. Plaintiff Stephanie Villareal received medical treatment from Perwaiz at CRMC from on or around 1988 to 1993.

1783. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Villareal without her consent.

1784. During that time, Perwaiz performed an unnecessary and uninformed unnecessary breast biopsy on Ms. Villareal without her consent. During the breast exam Perwaiz groped and massaged her breasts without her consent.

1785. During that time, Perwaiz performed an unnecessary and uninformed tubal procedure on Ms. Villareal without her consent.

1786. During that time, Perwaiz performed an unnecessary and uninformed left oophorectomy on Ms. Villareal without her consent.

1787. During that time, Perwaiz performed an unnecessary and uninformed removal of a cyst from her bowel (outside the scope of OB/GYN) on Ms. Villareal without her consent.

1788. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Villareal without her consent.

1789. Plaintiff Tanika Vincent received medical treatment from Perwaiz at CRMC from on or around 1995 to 2003.

1790. During that time, Perwaiz performed an unnecessary and uninformed oophorectomy on Ms. Vincent without her consent.

1791. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Vincent without her consent.

1792. During that time, Perwaiz performed an unnecessary and uninformed cholecystectomy on Ms. Vincent without her consent.

1793. During that time, Perwaiz performed multiple untimely, unnecessary and uninformed c-sections on Ms. Vincent without her consent.

1794. Plaintiff Lucia Vinci received medical treatment from Perwaiz at CRMC from around 2014 to around 2016 .

1795. During that time, Perwaiz performed an unnecessary and uninformed c-section surgery on Ms. Vinci without her consent.

1796. During that time, Perwaiz performed unnecessary and uninformed multiple tubal ligations on Ms. Vinci without her consent.

1797. Plaintiff Tonya Vinson Hainsworth received medical treatment from Perwaiz at CRMC from on or around 2007 to 2013.

1798. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Vinson Hainsworth without her consent.

1799. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Vinson Hainsworth without her consent.

1800. Plaintiff Tarquashia Waddler received medical treatment from Perwaiz at CRMC from around 2014 to around 2019.

1801. During that time, Perwaiz performed multiple unnecessary and uninformed ovarian cystectomies on Ms. Waddler without her consent.

1802. During that time, Perwaiz performed an unnecessary and uninformed gynecological surgery on Ms. Waddler without her consent.

1803. During that time, Perwaiz performed an unnecessary and uninformed early induction of labor and c-section on Ms. Waddler without her consent.

1804. Plaintiff Ann Walker received medical treatment from Perwaiz at CRMC from on or around 2000 to 2003.

1805. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Walker without her consent for cancer she never had.

1806. Plaintiff Ashley Walker received medical treatment from Perwaiz at CRMC from on or around 20016 to 2019.

1807. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Walker without her consent.

1808. Plaintiff Christy Walker received medical treatment from Perwaiz at CRMC from on or around 2006 to 2015.

1809. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor and c-section on Ms. Walker without her consent.

1810. Plaintiff Michelle Walker received medical treatment from Perwaiz at CRMC from around October 22, 2018 to around November 4, 2019.

1811. On or around November 2, 2018, Perwaiz performed an unnecessary and uninformed gynecologic surgery on Ms. Walker to remove polyps without her consent.

1812. On or around October 26, 2019, Perwaiz performed an unnecessary and uninformed surgery on Ms. Walker to remove her fallopian tubes and ovary without her consent.

1813. Plaintiff Tamesha Walker received medical treatment from Perwaiz at CRMC from around 2012 to around 2018.

1814. Plaintiff Bridget Ward received medical treatment from Perwaiz at CRMC from around 2017 to around 2019.

1815. In or around November 2020, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Ward without her consent.

1816. Plaintiff Cathy Ward received medical treatment from Perwaiz at CRMC from around February 1, 2019 to around March 1, 2019.

1817. On or around February 26, 2019, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Ward without her consent.

1818. Plaintiff Dierdra Ward received medical treatment from Perwaiz at CRMC on or around 2007.

1819. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Ward without her consent.

1820. Plaintiff Karen Warren received medical treatment from Perwaiz at CRMC on or around 2004.

1821. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Warren without her consent.

1822. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Warren without her consent.

1823. Plaintiff Laura Warren received medical treatment from Perwaiz at CRMC from on or around 2015 to 2019.

1824. During this time, when Ms. Warren was pregnant, Perwaiz induced her labor early, unnecessarily or without informed consent.

1825. During this time, when Ms. Warren was pregnant with her second child, Perwaiz induced her labor early, unnecessarily or without informed consent.

1826. During or around 2019, Perwaiz performed over five unnecessary and uninformed gynecologic procedures on Ms. Warren without her consent.

1827. Plaintiff Linda Warren received medical treatment from Perwaiz at CRMC from on or around 2004 to 2005.

1828. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Warren without her consent.

1829. Plaintiff Shameka Warren received medical treatment from Perwaiz at CRMC from on or around 2009 to 2012.

1830. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Warren without her consent.

1831. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Warren without her consent.

1832. Plaintiff Cheryl Washington received medical treatment from Perwaiz at CRMC from around 1993 to around 1996.

1833. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy surgery on Ms. Washington without her consent.

1834. During that time, Perwaiz performed unnecessary and uninformed gynecological surgeries on Ms. Washington without her consent.

1835. Plaintiff Tammy Washington received medical treatment from Perwaiz at CRMC on or around 1998.

1836. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Washington without her consent including a laparoscopic procedure without her consent.

1837. Plaintiff Tamika Wescott received medical treatment from Perwaiz at CRMC from around 2000 to around 2019.

1838. During this time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage surgeries on Ms. Wescott without her consent.

1839. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Wescott without her consent.

1840. Plaintiff Bianca West received medical treatment from Perwaiz at CRMC in or around 2012.

1841. Plaintiff Eboni West received medical treatment from Perwaiz at CRMC from around 2005 to around 2009.

1842. During this time, Perwaiz performed multiple untimely, unnecessary and uninformed c-sections on Ms. West without her consent.

1843. Plaintiff Sherri Wheeler received medical treatment from Perwaiz at CRMC from on or around 1991 to 1992.

1844. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Wheeler without her consent.

1845. Plaintiff Vickie Whidbee received medical treatment from Perwaiz at CRMC from on or around 1990 to 1996.

1846. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Whidbee without her consent.

1847. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Whidbee without her consent.

1848. Plaintiff Cathy Whitaker received medical treatment from Perwaiz at CRMC from or around 2010 to 2015.

1849. Plaintiff Mary Lou Whitaker received medical treatment from Perwaiz at CRMC from around May 2017 to around September 2018.

1850. In or around August 2017, Perwaiz performed an unnecessary and uninformed bladder surgery on Ms. Whitaker without her consent.

1851. Plaintiff Lequisha White received medical treatment from Perwaiz at CRMC from on or around 1997 to 2010.

1852. During that time, Perwaiz performed an unnecessary and uninformed partial hysterectomy on Ms. White without her consent.

1853. During that time, Perwaix performed an unnecessary and uninformed total hysterectomy on Ms. White without her consent.

1854. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor and c-section on Ms. White without her consent.

1855. Plaintiff Lynette White received medical treatment from Perwaiz at CRMC from on or around 1989 to 1993.

1856. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. White without her consent claiming she had uterine fibroids, pelvic scar tissue and abnormal ovaries.

1857. Plaintiff Relyea White received medical treatment from Perwaiz at CRMC from around 2010 to around 2015.

1858. During that time, Perwaiz sexually assaulted Ms. White with inappropriate physical touching and verbal commentary.

1859. Plaintiff Wilma White received medical treatment from Perwaiz at CRMC from around 2002 to around 2019.

1860. On or around July 21, 2018, Perwaiz performed an unnecessary and uninformed gynecologic surgery on Ms. White without her consent.

1861. Plaintiff Ashanti Whitfield received medical treatment from Perwaiz at CRMC on or around December 10, 2016.

1862. Plaintiff Lakesha Whiting received medical treatment from Perwaiz at CRMC from on or around 1996 to 2012.

1863. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies and oophorectomy on Ms. Whiting without her consent.

1864. Plaintiff Tiffany Whitney received medical treatment from Perwaiz at CRMC from around 2013 to around 2016,

1865. During that time, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Whitney.

1866. Plaintiff Du'Wayla Wiggins received medical treatment from Perwaiz at CRMC from around January 10, 2018 to around September 3, 2018.

1867. On or around September 8, 2018, Perwaiz induced Ms. Wiggins early unnecessarily resulting in an extremely painful, prolonged, and traumatic birth.

1868. Plaintiff Saranise Wilder received medical treatment from Perwaiz at CRMC from around 2012 to around 2016.

1869. In or around February 2016, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Wilder without consent, necessitating a hysterectomy.

1870. In or around November 2019, Perwaiz scheduled Ms. Wilder for an unnecessary and uninformed cyst removal procedure.

1871. Perwaiz was arrested before he could operate on Ms. Wilder again.

1872. Plaintiff Jan Wilkins received medical treatment from Perwaiz at CRMC from on or around 1989.

1873. Plaintiff Peggy Wilkins received medical treatment from Perwaiz at CRMC from on or around 2008 to 2017.

1874. During that time, Perwaiz performed an unnecessary and uninformed cystectomy on Ms. Wilkins without her consent.

1875. Plaintiff Tyrina Wilkins received medical treatment from Perwaiz at CRMC from around 2000 to around 2016.

1876. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Wilkins without her consent.

1877. During that time, Perwaiz performed untimely, unnecessary and uninformed c-sections on Ms. Wilkins without her consent.

1878. Plaintiff Angela Williams received medical treatment from Perwaiz at CRMC from around 2013 to around 2016.

1879. Plaintiff Donna Williams received medical treatment from Perwaiz at CRMC on or around April 15, 2018.

1880. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Williams without her consent resulting in a stillbirth and requiring a dilation and curettage.

1881. Plaintiff Chessie Williams received medical treatment from Perwaiz at CRMC on or around 2012.

1882. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages and cystectomies on Ms. Williams without her consent.

1883. Plaintiff Cynthia Williams received medical treatment from Perwaiz at CRMC on or around 2012.

1884. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Williams without her consent.

1885. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Williams without her consent.

1886. Plaintiff Donna Williams received medical treatment from Perwaiz at CRMC on or around 2018.

1887. During that time, Perwaiz performed an untimely, unnecessary and uninformed early induction of labor on Ms. Williams without her consent.

1888. Plaintiff Kanitra Williams received medical treatment from Perwaiz at CRMC from on or around 2002 to 2010.

1889. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettage on Ms. Williams without her consent.

1890. During that time, Perwaiz performed multiple unnecessary and uninformed laparoscopic surgeries on Ms. Williams without her consent.

1891. Plaintiff Keona Williams received medical treatment from Perwaiz at CRMC from around 2015 to around 2016.

1892. In or around 2015 or 2016, Perwaiz performed two unnecessary and uninformed tubal ligation surgeries on Ms. Williams without her consent.

1893. In or around 2015 or 2016, Perwaiz performed two unnecessary and uninformed dilation and curettage surgeries on Ms. Williams without her consent.

1894. Plaintiff La'Toya Williams received medical treatment from Perwaiz at CRMC from on or around 2000 to 2001.

1895. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Williams without her consent.

1896. Plaintiff Luqueen Williams received medical treatment from Perwaiz at CRMC from around September 22, 2002 to around November 19, 2019.

1897. In or around 2019, Perwaiz performed an unnecessary and uninformed gynecologic procedure on Ms. Williams without her consent.

1898. Plaintiff Neva Williams received medical treatment from Perwaiz at CRMC from on or around 2012 to 2013.

1899. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Williams without her consent.

1900. Plaintiff Rebecca Williams received medical treatment from Perwaiz at CRMC from on or around 1984 to 1986.

1901. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Williams without her consent.

1902. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Williams without her consent.

1903. Plaintiff Sonya Williams received medical treatment from Perwaiz at CRMC on or around 2012.

1904. During that time, Perwaiz performed multiple unnecessary and uninformed dilation and curettages on Ms. Williams without her consent.

1905. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Williams without her consent.

1906. Plaintiff Tamika Williams received medical treatment from Perwaiz at CRMC on or around 2016.

1907. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Williams without her consent.

1908. Plaintiff Yovone Williams received medical treatment from Perwaiz at CRMC from on or around 2008 to 2010.

1909. During that time, Perwaix performed an unnecessary and uninformed hysterectomy on Ms. Williams without her consent.

1910. Plaintiff Angela Wilson received medical treatment from Perwaiz at CRMC from on or around 2006 to 2016.

1911. Plaintiff Annette Wilson received medical treatment from Perwaiz at CRMC from on or around 1991.

1912. During that time, Perwaiz performed an untimely, unnecessary and uninformed c-section on Ms. Williams without her consent.

1913. Plaintiff Eretta Wilson received medical treatment from Perwaiz at CRMC on or around 2010.

1914. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Wilson without her consent.

1915. Plaintiff Jennifer Wilson received medical treatment from Perwaiz at CRMC from around April 1, 1993 to around April 1, 2018.

1916. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Wilson without her consent.

1917. Plaintiff Latoya Wilson received medical treatment from Perwaiz at CRMC from around 2002 to around 2017.

1918. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological on Ms. Wilson without her consent.

1919. During that time, Perwaiz performed an untimely, unnecessary and uninformed early inductions of labor on Ms. Wilson without her consent.

1920. Plaintiff Michelle Wilson received medical treatment from Perwaiz at CRMC from around 2005 to around 2017.

1921. During that time, Perwaiz performed multiple unnecessary and uninformed myomectomies on Ms. Wilson without her consent.

1922. Plaintiff Toynessia Wilson received medical treatment from Perwaiz at CRMC from on or around 1998 to 2011.

1923. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological surgeries on Ms. Wilson without her consent.

1924. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Wilson without her consent.

1925. Plaintiff Fredrika Winborne received medical treatment from Perwaiz at CRMC on or around November 8, 2019.

1926. On or around November 8, 2019, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Winborne without her consent.

1927. Plaintiff Kim Wint received medical treatment from Perwaiz at CRMC on or around 2003.

1928. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Wint without her consent.

1929. Plaintiff Arlene Wood received medical treatment from Perwaiz at CRMC from around 1992 to 1993.

1930. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy and an abdominoplasty on Ms. Wood without her consent.

1931. Plaintiff Madyson Woods received medical treatment from Perwaiz at CRMC from around 2018 to around 2019.

1932. Plaintiff Mariah Woods received medical treatment from Perwaiz at CRMC from around 2006 to around 2007.

1933. During that time, Perwaiz performed multiple unnecessary and uninformed LEEP procedures on Ms. Woods without her consent.

1934. Plaintiff Dawn Worells received medical treatment from Perwaiz at CRMC from around 1984 to 2007.

1935. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Worells without her consent.

1936. During that time, Perwaiz performed unnecessary and uninformed dilation and curettages on Ms. Worells.

1937. During that time, Perwaiz performed multiple unnecessary and uninformed gynecological procedures on Ms. Worells.

1938. Plaintiff Crystal Worrell received medical treatment from Perwaiz at CRMC from around 2016 to around October 2018.

1939. On or around October 13, 2018, Perwaiz performed an unnecessary and uninformed dilation and curettage surgery on Ms. Worrell without her consent.

1940. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Worrell without her consent.

1941. Plaintiff Dana Worthington received medical treatment from Perwaiz at CRMC in or around 2008.

1942. During that time, Perwaiz performed an unnecessary and uninformed tubal ligation on Ms. Worthington without her consent.

1943. During that time, Perwaiz performed an unnecessary and uninformed early induction of labor and c-section on Ms. Worthington without her consent.

1944. Plaintiff Kimberly W. Wright received medical treatment from Perwaiz at CRMC from around August 1996 to around November 2016.

1945. During this time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Wright without her consent.

1946. Plaintiff Tonya Wright received medical treatment from Perwaiz at CRMC from on or around 2007 to 2010.

1947. During that time, Perwaiz performed multiple unnecessary and uninformed cystectomies on Ms. Wright without her consent.

1948. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Wright without her consent.

1949. Plaintiff Rachel Zuiderveen received medical treatment from Perwaiz at CRMC from on or around 1998 to 2010.

1950. During that time, Perwaiz performed multiple unnecessary and uninformed fibroidectomies on Ms. Zuiderveen without her consent.

1951. During that time, Perwaiz performed an unnecessary and uninformed hysterectomy on Ms. Zuiderveen and bladder repair without her consent.

COUNT I
NEGLIGENT HIRING AND RETENTION
Defendant CRMC

1952. Defendant CRMC had a non-delegable duty to exercise reasonable care in the selection, hiring, training, and supervision of its employees and agents, including Perwaiz,

particularly those employees and agents, including Perwaiz, hired to perform inherently dangerous and irreversible medical procedures on its patients, including Plaintiffs.

1953. Performance of these inherently dangerous and irreversible medical procedures involves an unreasonable risk of injury to a patient if not done competently or properly.

1954. Defendant CRMC had a non-delegable duty to supervise and control the manner and method of the performance of the duties of its employees and agents, including Perwaiz.

1955. Defendant CRMC knew or reasonably should have known that Perwaiz would and did provide dangerous, medically unnecessary, and irreversible medical procedures on its patients, including Plaintiffs.

1956. Defendant CRMC carelessly, negligently, and recklessly breached this duty by selecting and retaining Perwaiz when it knew that he would and did provide dangerous, medically unnecessary, and irreversible medical procedures on Defendant CRMC's patients, including Plaintiffs.

1957. Defendant CRMC with gross negligence disregarded patient care and allowed Perwaiz's unnecessary surgeries, in order to increase its own revenue.

COUNT II
NEGLIGENCE, GROSS NEGLIGENCE, AND RECKLESS DISREGARD
All Defendants

Negligent Credentialing and Privileging

1958. Plaintiffs repeat and reallege each of the paragraphs above as if set forth herein.

1959. Defendants had a duty to CRMC patients, including Plaintiffs, to exercise reasonable care in granting and reviewing Perwaiz's credentials and privileges to practice in CRMC facilities.

1960. Defendant CRMC is vicariously responsible for the actions and inactions of its employees and agents, including the CRMC CEOs.

1961. Defendants failed to exercise reasonable care in granting and reviewing Perwaiz's credentials and privileges by:

- a. credentialing and privileging Perwaiz despite his decades of demonstrated incompetence, performance of unnecessary surgical procedures on his patients, and misconduct;
- b. failing to suspend, limit, or restrict Perwaiz's credentials or privileges given his risk to patient safety;
- c. failing to follow Joint Commission standards, including MS.06.01.03 and MS.06.01.05;
- d. ignoring complaints from staff, nurses, patients, or other physicians about Perwaiz regarding safety concerns and abnormal practices;
- e. failing to utilize, or failing to utilize appropriate and competent, OPPE and FPPE, pursuant to MS.08.01.03 and MS.08.01.01, with respect to Perwaiz;
- f. failing to evaluate or investigate Perwaiz's treatment of patients or failing to conduct a reasonable and prudent investigation or evaluation of Perwaiz's treatment of patients despite continuous reports and complaints;
- g. approving or allowing credentialing and privileging based on financial motivation rather than patient safety or quality standards; and
- h. committing other negligent acts or omissions that further investigation and discovery may reveal.

1962. Defendants' actions and omissions in negligently credentialing and privileging Perwaiz, including ignoring substantial evidence of Perwaiz's dangerous practices while continuing to approve his credentials and privileges, constitute gross negligence and evince an utter disregard for the safety of Perwaiz's patients including Plaintiffs.

1963. Plaintiffs reasonably relied upon Defendants' credentialing and privileging process in that they would not have undergone treatment with Perwaiz if he were not credentialed or privileged at CRMC.

Failure to Exercise Reasonable Care in Creating or Maintaining Risks of Harm

1964. Defendants further had a duty to exercise reasonable care to avoid negligent conduct that harms Plaintiffs because Defendants' actions in enabling Perwaiz to practice at CRMC created, maintained, or continued a foreseeable risk of physical harm to Perwaiz's patients, including Plaintiffs. Put differently, because Defendants knew of and created a recognizable risk of harm to Perwaiz's CRMC patients by credentialing and privileging Perwaiz, allowing him to treat CRMC patients despite his misconduct, Defendants had a duty to exercise ordinary care to prevent injury to Perwaiz's CRMC patients, including Plaintiffs, regardless of Defendants' legal relationship with Perwaiz's CRMC patients.

1965. Defendants failed to exercise such reasonable care after foreseeably creating and maintaining a recognizable risk of physical harm to Perwaiz's patients, including Plaintiffs, by:

- a. credentialing and privileging Perwaiz despite his decades of demonstrated incompetence, performance of unnecessary surgical procedures on his patients, and misconduct;

- b. failing to suspend, limit, or restrict Perwaiz's credentials or privileges given his risk to patient safety;
- c. failing to follow Joint Commission standards, including MS.06.01.03 and MS.06.01.05;
- d. ignoring complaints from staff, nurses, patients, or other physicians about Perwaiz regarding safety concerns and abnormal practices;
- e. failing to utilize, or failing to utilize appropriate and competent, OPPE and FPPE, pursuant to MS.08.01.03 and MS.08.01.01, with respect to Perwaiz;
- f. failing to evaluate or investigate Perwaiz's treatment of patients or failing to conduct a reasonable and prudent investigation or evaluation of Perwaiz's treatment of patients despite continuous reports and complaints;
- g. approving or allowing credentialing and privileging based on financial motivation rather than patient safety or quality standards; and
- h. committing other negligent acts or omissions that further investigation and discovery may reveal.

1966. Defendants' actions and omissions in failing to take reasonable care after creating, maintaining, or continuing a foreseeable risk of harm to Plaintiffs by enabling Perwaiz's dangerous practices constitute gross negligence and evince an utter disregard for the safety of Perwaiz's patients including Plaintiffs.

Breach of Duties Arising Out of Special Relationships

1967. A special relationship existed between Defendants and Perwaiz which gave rise to Defendants' special duty to protect Plaintiffs from Perwaiz.

1968. Defendants knew or should have known of Perwaiz’s prior history of misconduct and reported misconduct, including reports of disturbing, unlawful, and harmful interactions with CRMC patients.

1969. Defendants, as CRMC CEOs in charge of hospital operations, had the power to control Perwaiz’s actions as a CRMC physician.

1970. Defendants exercised control over Perwaiz through the privileging and credentialing process.

1971. Emails among CRMC leadership reference Defendants’ ability to control Perwaiz, including one email stating it was “up to the new CEO” to address Perwaiz’s conduct.

1972. Defendants “took charge” of Perwaiz by credentialing and privileging him, allowing him to practice at CRMC facilities.

1973. Defendants knew or should have known that Perwaiz was likely to cause bodily harm to patients, including Plaintiffs, if not controlled.

1974. Defendants therefore had a duty to exercise reasonable care to control Perwaiz to prevent him from harming Plaintiffs.

1975. Defendants breached their duty to protect Plaintiffs based on Defendants’ special relationship with Perwaiz by:

- a. credentialing and privileging Perwaiz despite his decades of demonstrated incompetence, performance of unnecessary surgical procedures on his patients, and misconduct;
- b. failing to suspend, limit, or restrict Perwaiz’s credentials or privileges given his risk to patient safety;

- c. failing to follow Joint Commission standards, including MS.06.01.03 and MS.06.01.05;
- d. ignoring complaints from staff, nurses, patients, or other physicians about Perwaiz regarding safety concerns and abnormal practices;
- e. failing to utilize, or failing to utilize appropriate and competent, OPPE and FPPE, pursuant to MS.08.01.03 and MS.08.01.01, with respect to Perwaiz;
- f. failing to evaluate or investigate Perwaiz's treatment of patients or failing to conduct a reasonable and prudent investigation or evaluation of Perwaiz's treatment of patients despite continuous reports and complaints;
- g. approving or allowing credentialing and privileging based on financial motivation rather than patient safety or quality standards; and
- h. committing other negligent acts or omissions that further investigation and discovery may reveal.

1976. A special relationship also existed between Plaintiffs and Defendants which gave rise to Defendants' special duty to protect Plaintiffs.

1977. The facts of this case warrant a finding that a special relationship existed between Defendants and Plaintiffs that gave rise to Defendants' duty to exercise reasonable care to protect Plaintiffs.

1978. A de facto special relationship arose between Plaintiffs and Defendants because Defendants, as CRMC CEOs with knowledge of Perwaiz's prior misconduct, reasonably could have foreseen that they would be expected to take affirmative action to protect Plaintiffs from harm.

1979. Defendants were aware that female patients in Perwaiz’s care, including Plaintiffs, were uniquely vulnerable to harm due to their inability to know of his undisclosed misconduct and the inherent information and power imbalance between a physician and patient.

1980. Furthermore, Defendants were aware that Perwaiz’s surgical patients, including Plaintiffs, were uniquely vulnerable in that they were sedated, partially clothed or exposed, unable to protect themselves, and unable to verify what was being done to their bodies throughout the operations.

1981. Recently enacted Va. Code § 8.01-42.6 defines “vulnerable victim” to include, as a matter of law, “a patient of a health care provider” in the employer liability context given patients’ unique vulnerability in healthcare settings.

1982. Defendants, as CRMC CEOs, knew or should have known that, given Perwaiz’s history of misconduct, Plaintiffs were in great danger of seriously bodily harm while in his care and that Defendants, as CRMC CEOs with the power to credential and privilege Perwaiz and otherwise control hospital operations, would be expected to take affirmative action to protect Plaintiffs from Perwaiz.

1983. Defendants breached their duty to protect Plaintiffs based on their special relationship with Plaintiffs by:

- a. credentialing and privileging Perwaiz despite his decades of demonstrated incompetence, performance of unnecessary surgical procedures on his patients, and misconduct;
- b. failing to suspend, limit, or restrict Perwaiz’s credentials or privileges given his risk to patient safety;

- c. failing to follow Joint Commission standards, including MS.06.01.03 and MS.06.01.05;
- d. ignoring complaints from staff, nurses, patients, or other physicians about Perwaiz regarding safety concerns and abnormal practices;
- e. failing to utilize, or failing to utilize appropriate and competent, OPPE and FPPE, pursuant to MS.08.01.03 and MS.08.01.01, with respect to Perwaiz;
- f. failing to evaluate or investigate Perwaiz's treatment of patients or failing to conduct a reasonable and prudent investigation or evaluation of Perwaiz's treatment of patients despite continuous reports and complaints;
- g. approving or allowing credentialing and privileging based on financial motivation rather than patient safety or quality standards; and
- h. committing other negligent acts or omissions that further investigation and discovery may reveal.

1984. Defendants' actions and omissions in breaching their special relationship duty to Plaintiffs constitute gross negligence and evince an utter disregard for the safety of Perwaiz's patients including Plaintiffs.

**COUNT III
VICARIOUS LIABILITY
Defendant CRMC**

1985. Plaintiffs repeat and reallege each paragraph above as if fully set forth herein.

1986. Defendant CRMC is liable for the acts and omissions of its employees and agents, including the Defendant CRMC CEOs and Perwaiz, while acting within the course and scope of their employment and agency.

1987. Defendant CRMC was in charge of, had the right to control, and exercised control over its employees and agents, the Defendant CRMC CEOs and Perwaiz.

1988. At all relevant times, the Defendant CRMC CEOs and Perwaiz were acting within the course and scope of their employment and agency with Defendant CRMC.

1989. Notwithstanding their duties to Plaintiffs, Defendants CRMC and the Defendant CRMC CEOs and Perwaiz breached their duties as fully described in Count II, *supra*.

1990. Defendant CRMC is vicariously liable for the Defendant CRMC CEO's and Perwaiz's grossly negligent and reckless actions and omissions.

DAMAGES AND PRAYER

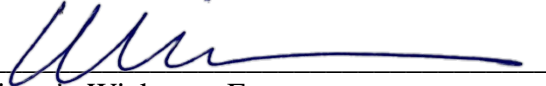
1991. As a direct and proximate result of Defendants' grossly negligent and reckless actions and omissions, Plaintiffs sustained serious bodily injury, required and continue to require medical treatment, incurred and continue to incur medical costs and expenses associated with these treatments, were precluded and continue to be precluded from engaging in normal activities and pursuits, and sustained and will continue to sustain other losses and damages including mental distress and emotional anguish, pain and suffering, disfigurement and associated humiliation, inconvenience, and lost earnings.

1992. All of Plaintiffs' past, present, and future damages and losses are due solely to and by reason of Defendants' negligence, gross negligence, and recklessness.

WHEREFORE, each Plaintiff moves this Court for judgment against Defendants, jointly and severally, in the amount of TEN MILLION DOLLARS per plaintiff, with pre-judgment interest beginning on each Plaintiff's date of injury, an award of attorney fees and costs, and any such other relief this Court deems just and proper.

Plaintiffs demand a trial by jury of all issues.

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