

FILED-13

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

2009 JUN 24 PM 2:05
CIRCUIT COURT OF COOK
COUNTY, ILLINOIS
LAW DIVISION

DAHLIA RAMIREZ, a minor, by her parents)
EVILYN RAMIREZ and ERIK RAMIREZ;)
EVILYN RAMIREZ, individually; and ERIK)
RAMIREZ, individually;)

Plaintiffs,)

v.)

No. 09 L 13262

RUSH-COPLEY MEDICAL CENTER, an)
Illinois Corporation; SRIKUMAR PILLAI,)
M.D.; BONAVENTURE MEDICAL)
FOUNDATION, L.L.C. d/b/a Alexian)
Pediatric Specialty Group; ALEXIAN)
BROTHERS AMBULATORY GROUP,)
WAYNE PHAM, D.O., GUARDIAN)
ANESTHESIA ASSOCIATES, S.C.,)
and KIMBERLY LLOYD, R.N.;)

Defendants.)

SECOND AMENDED COMPLAINT AT LAW

NOW COME the Plaintiffs DAHLIA RAMIREZ, a minor, by her parents EVILYN RAMIREZ and ERIK RAMIREZ; EVILYN RAMIREZ, individually; and ERIK RAMIREZ, individually, by and through their attorneys, Cirignani, Heller & Harman, LLP, complaining of the Defendants, RUSH-COPLEY MEDICAL CENTER, SRIKUMAR PILLAI, M.D., BONAVENTURE MEDICAL FOUNDATION, L.L.C. d/b/a Alexian Pediatric Specialty Group, ALEXIAN BROTHERS AMBULATORY GROUP, WAYNE PHAM, D.O., GUARDIAN ANESTHESIA ASSOCIATES, S.C., and KIMBERLY LLOYD, R.N., stating as follows:

1. During the year 2009, and at all relevant times herein, Defendant **Rush-Copley Medical Center** (hereinafter referred to as "**Rush**") was a corporation organized and existing under the laws of the State of Illinois, providing medical services and facilities as a hospital, commonly known as Rush-Copley Medical Center, by and through its agents and employees, for the care and treatment of the patients admitted therein in the City of Aurora, County of Kane, State of Illinois, and in City of Chicago, Cook County, Illinois.

2. During the year 2009 and at all relevant times herein, Defendant **Srikumar Pillai, M.D.** (hereinafter referred to as "**Pillai**") was a physician duly licensed under the laws of the State of Illinois and was engaged in the practice of pediatric and general surgery in Kane and Cook Counties, Illinois.

3. During the year 2009 and at all times relevant herein, Defendant **Bonaventure Medical Foundation, L.L.C. d/b/a Alexian Pediatric Specialty Group** (hereinafter referred to as "**BMF**") was an Illinois limited liability company providing pediatric medical services for the care and treatment of pediatric patients, by and through its agents and employees, in Kane and Cook Counties, Illinois.

4. During the year 2009 and at all times relevant herein, Defendant **Alexian Brothers Ambulatory Group** (hereinafter referred to as "**ABAG**") was an Illinois company providing pediatric services for the care and treatment of pediatric patients, by and through its agents and employees, in Kane and Cook Counties, Illinois.

5. During the year of 2009 and at all relevant times herein, **Wayne Pham, D.O.** (hereinafter referred to as "**Pham**") was a doctor of osteopathic medicine duly licensed

under the laws of the State of Illinois and was engaged in the practice of anesthesiology in Kane County, Illinois.

6. During the year 2009 and at all times relevant herein, Defendant **Guardian Anesthesia Associates, S.C.** (hereinafter referred to as "**GAA**") was an Illinois corporation providing anesthesia services for the care and treatment of pediatric patients, by and through its agents and employees, in Kane and Cook Counties, Illinois.

7. During the year of 2009, and at all relevant times herein **Kimberly Lloyd, R.N.** (hereinafter referred to as "**Lloyd**") was a registered nurse duly licensed under the laws of the state of Illinois and was engaged in the practice of nursing in Kane County, Illinois.

8. On September 14, 2009, **Dahlia Ramirez** (hereinafter referred to as "**Dahlia**") was born.

9. On September 14, 2009, **Dahlia** was admitted to **Rush** and its neonatal intensive care unit (hereinafter "**NICU**").

10. On October 20, 2009, **Dahlia** was transferred to an operating room (hereinafter "**Operating Room**") for a non-emergent, scheduled treatment of a cardiac abnormality.

11. On October 20, 2009, **Dahlia's** surgery was performed by Defendant **Pillai**.

12. On October 20, 2009, the anesthesia for **Dahlia's** surgery was administered by Defendant **Pham**.

13. On October 20, 2009, the primary nursing duties in the Operating Room were handled by Defendant **Lloyd**.

14. On October 20, 2009, after anesthesia administration and the surgery had begun **Dahlia** was severely injured by a flash fire in the Operating Room.

15. Plaintiffs **EVILYN RAMIREZ** and **ERIK RAMIREZ** (hereinafter "**Parents**") are the parents of the minor Plaintiff **Dahlia**.

COUNT I
RUSH-COPLEY MEDICAL CENTER

16. Plaintiffs adopt and incorporate paragraphs 1-15 inclusive of this Complaint at Law as though fully set forth herein.

17. In October of 2009, and at all relevant times herein, Defendant **Pillai**, Defendant **Pham**, and Defendant **Lloyd**, and the physicians, nursing personnel and pharmacists at Rush-Copley Medical Center were agents and/or employees of Defendant **Rush**.

18. In the alternative, in October of 2009, and at all relevant times herein, Defendant **Rush** held out to **Dahlia** and **Parents** that Defendant **Pillai**, Defendant **Pham**, Defendant **Lloyd** and the physicians, nursing personnel and pharmacists at Rush-Copley Medical Center were agents of **Rush**; **Dahlia** and her **Parents** relied upon this representation; and this reliance was reasonable.

19. In October 2009, and at all relevant times herein, while Defendant **Pillai**, Defendant **Pham**, Defendant **Lloyd** and the physicians, nursing personnel and pharmacists

at Rush-Copley Medical Center were responsible for the care and safety of **Dahlia**, they were acting within the scope of their employment, or apparent agency with **Rush**.

20. Prior to and on October 20, 2009, and at all relevant times herein, Defendant **Rush** owned, operated, and maintained the Operating Room.

21. Prior to and on October 20, 2009, and at all relevant times herein, Defendant **Rush** had a non-delegable duty to create and maintain a safe Operating Room for, among others, its patients.

22. Prior to and on October 20, 2009, and at all relevant times herein, Defendant **Rush** had a non-delegable duty to ensure that everyone who used its Operating Room was trained in fire prevention and extinguishment especially during, but not limited to, times of surgery.

23. Prior to and on October 20, 2009, and at all relevant times herein, Defendant **Rush** knew or should have known that its operating room is rife with the components of the fire triangle – oxygen (oxidizer), fuel, and ignition (heat).

24. Prior to and on October 20, 2009, and at all relevant times herein, Defendant **Rush** knew or should have known of the Joint Commission's *Sentinel Event Alert* issued in June of 2003 for the prevention of fire triangles in the Operating Room.

25. Prior to and on October 20, 2009, and at all relevant times herein, it was the non-delegable duty of Defendant **Rush** to inspect and exercise reasonable care and caution in the control, use, construction, operation, management, maintenance and ownership of

the Operating Room to prevent injury by, among other things, preventing the fire triangle during surgery.

26. After assuming the care and treatment of **Dahlia** which included responsibility for the care and safety of **Dahlia**, Defendant **Rush** was guilty of one or more of the following wrongful acts and/or omissions:

- a. Negligently and carelessly failed to provide Dahlia with a safe environment of care;
- b. Negligently and carelessly failed to eliminate the elements of the fire triangle;
- c. Negligently and carelessly failed to educate and train hospital staff in how to control and minimize the elements of the fire triangle;
- d. Negligently and carelessly failed to educate and train operating licensed practitioners and anesthesia providers in how to control and minimize the elements of the fire triangle;
- e. Negligently and carelessly failed to put out the surgical fire during **Dahlia's** surgery in a timely and appropriate manner;
- f. Negligently and carelessly failed to educate and train hospital staff in how to safely put out a surgical fire in an operating room environment;
- g. Negligently and carelessly failed to educate and train operating licensed practitioners and anesthesia providers in how to put out a surgical fire in an operating room environment;
- h. Was otherwise negligent and careless in preventing the surgical fire that injured **Dahlia**; and
- i. Was otherwise negligent and careless in extinguishing the surgical fire that injured **Dahlia**.

27. As a direct and proximate result of one or more of the aforementioned acts and/or omissions of Defendant **Rush, Dahlia** suffered severe burns, permanent injury, permanent disability, permanent disfigurement, pain and suffering, and will in the future suffer additional disfigurement, loss of normal life, pain and suffering and pecuniary loss.

WHEREFORE, Plaintiff asks for judgment against Defendant **RUSH-COPLEY MEDICAL CENTER** in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT II
SRIKUMAR PILLAI, M.D.

28. Plaintiffs adopt and incorporate paragraphs 1-15 inclusive of this Complaint at Law as though fully set forth herein.

29. On October 20, 2009, and at all relevant times herein, there was a duty on the part of Defendant **Pillai** to create and maintain a safe Operating Room for, among others, his patients.

30. On October 20, 2009, and at all relevant times herein, Defendant **Pillai** had a non-delegable duty to ensure that everyone on his operating team was trained in fire prevention and extinguishment during times of surgery.

31. On October 20, 2009, and at all relevant times herein, Defendant **Pillai** had a non-delegable duty to ensure that everyone on **Dahlia's** operating team was taking and took steps to prevent fire during **Dahlia's** surgery.

32. On October 20, 2009, and at all relevant times herein, Defendant **Pillai** knew or should have known that the Operating Room was rife with the components of the fire triangle – oxygen (oxidizer), fuel, and ignition (heat).

33. Prior to and on October 20, 2009, and at all relevant times herein, Defendant **Pillai** knew or should have known of the Joint Commission's *Sentinel Event Alert* issued in June of 2003 for the preventing of fire triangles in the Operating Room.

34. On October 20, 2009, and at all relevant times herein, it was the non-delegable duty of Defendant **Pillai** to inspect and exercise reasonable care and caution in the control, use, operation, management, and maintenance of the Operating Room to prevent injury by, among other things, preventing the fire triangle during surgery.

35. After assuming the care and treatment of **Dahlia** which included responsibility for the care and safety of **Dahlia**, Defendant **Pillai** was guilty of one or more of the following wrongful acts and/or omissions:

- a. Negligently and carelessly failed to provide Dahlia with a safe environment of care;
- b. Negligently and carelessly failed to eliminate the elements of the fire triangle;
- c. Negligently and carelessly failed to determine that the surgical team caring for **Dahlia** was educated and trained in how to control and minimize the elements of the fire triangle;
- d. Negligently and carelessly failed to put out the surgical fire during **Dahlia's** surgery in a timely and appropriate manner;

- e. Negligently and carelessly failed to determine that the surgical team caring for **Dahlia** was educated and trained in how to safely put out a surgical fire in an operating room environment;
- f. Negligently and carelessly failed to ensure that everyone on **Dahlia's** operating team was taking and had taken steps to prevent fire during **Dahlia's** surgery;
- g. Was otherwise negligent and careless in preventing the surgical fire that injured **Dahlia**; and
- h. Was otherwise negligent and careless in extinguishing the surgical fire that injured **Dahlia**.

36. As a direct and proximate result of one or more of the aforementioned acts and/or omissions of Defendant **Pillai**, **Dahlia** suffered severe burns, permanent injury, permanent disability, permanent disfigurement, pain and suffering, and will in the future suffer additional disfigurement, loss of normal life, pain and suffering and pecuniary loss.

WHEREFORE, Plaintiff asks for judgment against Defendant **SRIKUMAR PILLAI, M.D.** in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT III
BONAVENTURE MEDICAL FOUNDATION, L.L.C.

37. Plaintiffs adopt and incorporate paragraphs 1-15 inclusive of this Complaint at Law as though fully set forth herein.

38. Plaintiffs adopt and incorporate paragraphs 29-36 inclusive of this Complaint at Law as though fully set forth herein.

39. In October 2009, and at all relevant times herein, Defendant **Pillai** was an agent and/or employee of Defendant **BMF**.

40. At all relevant times herein while Defendant **Pillai** was responsible for the care and safety of **Dahlia**, he was acting within the scope of his employment with Defendant **BMF**.

WHEREFORE, Plaintiff asks for judgment against Defendant **BONAVENTURE MEDICAL FOUNDATION, L.L.C.** in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT IV
ALEXIAN BROTHERS AMBULATORY GROUP

41. Plaintiffs adopt and incorporate paragraphs 1-15 inclusive of this Complaint at Law as though fully set forth herein.

42. Plaintiffs adopt and incorporate paragraphs 29-36 inclusive of this Complaint at Law as though fully set forth herein.

43. In October 2009, and at all relevant times herein, Defendant **Pillai** was an agent and/or employee of Defendant **ABAG**.

44. At all relevant times herein while Defendant **Pillai** was responsible for the care and safety of **Dahlia**, he was acting within the scope of his employment with Defendant **ABAG**.

WHEREFORE, Plaintiff asks for judgment against Defendant **ALEXIAN BROTHERS AMBULATORY GROUP** in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT V
WAYNE PHAM, M.D.

45. Plaintiffs adopt and incorporate paragraphs 1-15 inclusive of this Complaint at Law as though fully set forth herein.

46. On October 20, 2009, and at all relevant times herein, there was a duty on the part of Defendant **Pham** to create and maintain a safe Operating Room for, among others, his patients.

47. On October 20, 2009, and at all relevant times herein, Defendant **Pham** had a non-delegable duty to ensure that everyone on **Dahlia's** operating team was educated and trained in fire prevention and extinguishment during times of surgery.

48. On October 20, 2009, and at all relevant times herein, Defendant **Pham** had a non-delegable duty to ensure that everyone on **Dahlia's** operating team was taking and took steps to prevent fire during **Dahlia's** surgery.

49. On October 20, 2009, and at all relevant times herein, Defendant **Pham** knew or should have known that the operating room was rife with the components of the fire triangle—oxygen (oxidizer), fuel, and ignition (heat).

50. Prior to and on October 20, 2009, and at all relevant times herein, Defendant **Pham** knew or should have known of the Joint Commission's *Sentinel Event Alert* issued in June of 2003 for the preventing of fire triangles in the Operating Room.

51. On October 20, 2009, and at all relevant times herein, it was the non-delegable duty of Defendant **Pham** to inspect and exercise reasonable care and caution in the control,

use, operation, management, and maintenance of the Operating Room to prevent injury by, among other things, preventing the fire triangle during surgery.

52. After assuming the care and treatment of **Dahlia** which included responsibility for the care and safety of **Dahlia**, Defendant **Pham** was guilty of one or more of the following wrongful acts and/or omissions:

- a. Negligently and carelessly failed to provide Dahlia with a safe environment of care;
- b. Negligently and carelessly failed to eliminate the elements of the fire triangle;
- c. Negligently and carelessly failed to determine that the surgical team caring for **Dahlia** was educated and trained in how to control and minimize the elements of the fire triangle;
- d. Negligently and carelessly failed to put out the surgical fire during **Dahlia's** surgery thereby causing further injuries;
- e. Negligently and carelessly failed to determine that the surgical team caring for **Dahlia** was educated and trained in how to safely put out a surgical fire in an operating room environment;
- f. Negligently and carelessly failed to ensure that everyone on **Dahlia's** operating team was taking and had taken steps to prevent fire during **Dahlia's** surgery;
- g. Was otherwise negligent and careless in preventing the surgical fire that injured **Dahlia**; and
- h. Was otherwise negligent and careless in extinguishing the surgical fire that injured **Dahlia**.

53. As a direct and proximate result of one or more of the aforementioned acts and/or omissions of Defendant **Pham**, **Dahlia** suffered severe burns, permanent injury,

permanent disability, permanent disfigurement, pain and suffering, and will in the future suffer additional disfigurement, loss of normal life, pain and suffering and pecuniary loss.

WHEREFORE, Plaintiff asks for judgment against Defendant **WAYNE PHAM, M.D.** in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT VI
GUARDIAN ANESTHESIA ASSOCIATES, S.C.

54. Plaintiffs adopt and incorporate paragraphs 1-15 inclusive of this Complaint at Law as though fully set forth herein.

55. Plaintiffs adopt and incorporate paragraphs 46-53 inclusive of this Complaint at Law as though fully set forth herein.

56. In October 2009, and at all relevant times herein, Defendant **Pham** was an agent and/or employee of Defendant **GAA**.

57. At all relevant times herein while Defendant **Pham** was responsible for the care and safety of **Dahlia**, he was acting within the scope of his employment with Defendant **GAA**.

WHEREFORE, Plaintiff asks for judgment against Defendant **GUARDIAN ANESTHESIA ASSOCIATES, S.C.** in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT VII
KIMBERLY LLOYD, R.N.

58. Plaintiffs adopt and incorporate paragraphs 1-15 inclusive of this Complaint at Law as though fully set forth herein.

59. On October 20, 2009, and at all relevant times herein, there was a duty on the part of Defendant **Lloyd** to create and maintain a safe Operating Room for, among others, her patients.

60. On October 20, 2009, and at all relevant times herein, Defendant **Lloyd** had a non-delegable duty to ensure that everyone on **Dahlia's** operating team was educated and trained in fire prevention and extinguishment during times of surgery.

61. On October 20, 2009, and at all relevant times herein, Defendant **Lloyd** had a non-delegable duty to ensure that everyone on **Dahlia's** operating team was taking and took steps to prevent fire during **Dahlia's** surgery.

62. On October 20, 2009, and at all relevant times herein, Defendant **Lloyd** knew or should have known that the operating room was rife with the components of the fire triangle—oxygen (oxidizer), fuel, and ignition (heat).

63. Prior to and on October 20, 2009, and at all relevant times herein, Defendant **Lloyd** knew or should have known of the Joint Commission's *Sentinel Event Alert* issued in June of 2003 for the preventing of fire triangles in the Operating Room.

64. On October 20, 2009, and at all relevant times herein, it was the non-delegable duty of Defendant **Lloyd** to inspect and exercise reasonable care and caution in the control, use, operation, management, and maintenance of the Operating Room to prevent injury by, among other things, preventing the fire triangle during surgery.

65. After assuming the care and treatment of **Dahlia** which included responsibility for the care and safety of **Dahlia**, Defendant **Lloyd** was guilty of one or more of the following wrongful acts and/or omissions:

- a. Negligently and carelessly failed to provide **Dahlia** with a safe environment of care;
- b. Negligently and carelessly failed to eliminate the elements of the fire triangle;
- c. Negligently and carelessly failed to determine that the surgical team caring for **Dahlia** was educated and trained in how to control and minimize the elements of the fire triangle;
- d. Negligently and carelessly failed to put out the surgical fire during **Dahlia's** surgery thereby causing further injuries;
- e. Negligently and carelessly failed to determine that the surgical team caring for **Dahlia** was educated and trained in how to safely put out a surgical fire in an operating room environment;
- f. Negligently and carelessly failed to ensure that everyone on **Dahlia's** operating team was taking and had taken steps to prevent fire during **Dahlia's** surgery;
- g. Was otherwise negligent and careless in preventing the surgical fire that injured **Dahlia**; and
- h. Was otherwise negligent and careless in extinguishing the surgical fire that injured **Dahlia**.

66. As a direct and proximate result of one or more of the aforementioned acts and/or omissions of Defendant **Lloyd**, **Dahlia** suffered severe burns, permanent injury, permanent disability, permanent disfigurement, pain and suffering, and will in the future suffer additional disfigurement, loss of normal life, pain and suffering and pecuniary loss.

WHEREFORE, Plaintiff asks for judgment against Defendant **KIMBERLY LLOYD, R.N.** in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT VIII
RUSH-COPLEY MEDICAL CENTER
SRIKUMAR PILLAI, M.D.
BONAVENTURE MEDICAL FOUNDATION, L.L.C.
ALEXIAN BROTHERS AMBULATORY GROUP
WAYNE PHAM, M.D.
GUARDIAN ANESTHESIA ASSOCIATES, S.C.,
KIMBERLY LLOYD, R.N.

67. Plaintiffs adopt and incorporate paragraphs 1-66 inclusive of this Complaint at Law as though fully set forth herein.

68. The incident which is the subject of this litigation is of a kind which ordinarily does not occur in the absence of negligence. This incident, without fault of Plaintiffs, was caused by agency or instrumentality within the exclusive control of Defendants. Plaintiffs **Dahlia** and **Parents** are not in a position to show the particular circumstances which caused the above mentioned injuries and damages. Therefore, the doctrine of *res ipsa loquitur* is applicable, and Defendants are jointly and severally liable for Plaintiffs' injuries and damages.

69. As a direct and proximate result of one or more of the aforementioned acts and/or omissions of Defendants **Rush, Pillai, BMF, ABAG, Pham, GAA** and **Lloyd, Dahlia** suffered severe burns, permanent injury, permanent disability, permanent disfigurement, and pain and suffering, and will in the future suffer additional disfigurement, loss of normal life, pain and suffering and pecuniary loss.

WHEREFORE, Plaintiff asks for judgment against Defendants **RUSH-COPLEY MEDICAL CENTER, SRIKUMAR PILLAI, M.D., BONAVENTURE MEDICAL FOUNDATION, L.L.C., d/b/a Alexian Pediatric Specialty Group, ALEXIAN BROTHERS AMBULATORY GROUP, WAYNE PHAM, M.D., GUARDIAN ANESTHESIA ASSOCIATES, S.C., and KIMBERLY LLOYD, R.N.** in an amount in excess of Fifty Thousand Dollars (\$50,000.00).

COUNT IX
RUSH-COPLEY MEDICAL CENTER
SRIKUMAR PILLAI, M.D.
BONAVENTURE MEDICAL FOUNDATION, L.L.C.
ALEXIAN BROTHERS AMBULATORY GROUP
WAYNE PHAM, M.D.
GUARDIAN ANESTHESIA ASSOCIATES, S.C.,
KIMBERLY LLOYD, R.N.
FAMILY EXPENSE ACT

70. Plaintiffs adopt and incorporate paragraphs 1-69 inclusive of this Complaint at Law as though fully set forth herein.

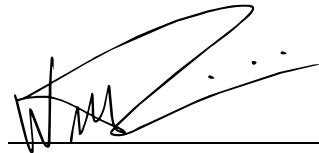
71. On and after October 20, 2009, **Dahlia** suffered severe, serious and permanent injury as a result of the negligent acts and/or omissions of Defendant **Rush, Pillai, BMF, ABAG, Pham, GAA and Lloyd**, as stated in paragraphs 1-78 of this Complaint At Law.

72. On October 20, 2009, **Parents** did then and there become obligated for various sums of money for the medical, hospital, and other care and costs of **Dahlia** and will so become obligated in the future, pursuant to the Family Expense Act.

WHEREFORE, Plaintiff prays for judgment against **RUSH-COPLEY MEDICAL CENTER, SRIKUMAR PILLAI, M.D., BONAVENTURE MEDICAL FOUNDATION,**

L.L.C., d/b/a ALEXIAN PEDIATRIC SPECIALTY GROUP, WAYNE PHAM, M.D.,
GUARDIAN ANESTHESIA ASSOCIATES, S.C., and KIMBERLY LLOYD, R.N., in an
amount in excess of Fifty Thousand Dollars (\$50,000.00).

Respectfully submitted,



William A. Cirignani, Attorney for Plaintiff
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I.D.# 39376

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

DAHLIA RAMIREZ, a minor, by her parents)
EVILYN RAMIREZ and ERIK RAMIREZ;)
EVILYN RAMIREZ, individually; and ERIK)
RAMIREZ, individually;)

Plaintiffs,)

v.)

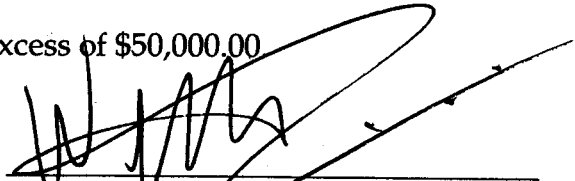
No.)

RUSH UNIVERSITY MEDICAL CENTER,)
an Illinois Corporation; et al.)

Defendants.)

ATTORNEY'S AFFIDAVIT

I, William A. Cirignani, an attorney, on oath, do hereby state in the case of *Ramirez v. Rush University Medical Center, et al.*: I certify, pursuant to Illinois Supreme Court Rule 222(b), that Plaintiffs seek money damages in excess of \$50,000.00



William A. Cirignani

SUBSCRIBED and SWORN
to before me this 9th day of November, 2009.



NOTARY PUBLIC

CIRIGNANI, HELLER & HARMAN, LLP
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I.D.#39376

