

IN THE COURT OF COMMON PLEAS
CIVIL DIVISION
HAMILTON COUNTY, OHIO

A0201484

DENISE FAIRBANKS
c/o Crabbe Brown & James LLP
30 Garfield Place, Suite 740
Cincinnati, OH 45202

Plaintiff

vs.

PLANNED PARENTHOOD
SOUTHWEST OHIO REGION
Serve: Statutory Agent
Alphonse A. Gerhardstein
1409 Enquirer Building
617 Vine Street
Cincinnati, OH 45202

and

ROSLYN KADE, M.D.
c/o Daniel J. Buckley, Esq.
Vorys Sater Seymour & Pease
221 E. Fourth St., Suite 2000
Cincinnati, Ohio 45202

and

A.M.
c/o Daniel J. Buckley, Esq.
Vorys Sater Seymour & Pease
221 E. Fourth St., Suite 2000
Cincinnati, Ohio 45202

and

JULIA PIERCEY
c/o Daniel J. Buckley, Esq.
Vorys Sater Seymour & Pease
221 E. Fourth St., Suite 2000
Cincinnati, Ohio 45202

and

CASE NO. _____

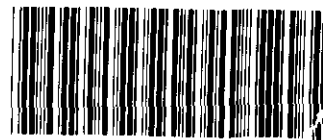
Judge _____

COMPLAINT

(JURY DEMAND ENDORSED
HEREON)

u

| | | | |
|---|----------------------------------|-------------------------------|---------|
| ORIG. | COMP | PARTIES | SUMMONS |
| <input checked="" type="checkbox"/> CERT MAIL | <input type="checkbox"/> SHERIFF | <input type="checkbox"/> WAVE | |
| <input type="checkbox"/> PROCESS DEPT. | <input type="checkbox"/> NONP. | | |
| CLERKS FEES | DH | | TIC |
| SECURITY FOR COST | | | |
| DEPOSITED BY | | 7827 | |
| FILING CODE | | H705 | |



D82151675 INI

PATRICIA M. CLANG
CLERK OF COURTS
HAMILTON COUNTY, OH

2009 FEB 13 A 9:09

FILED

L.P. :
c/o Daniel J. Buckley, Esq. :
Vorys Sater Seymour & Pease :
221 E. Fourth St., Suite 2000 :
Cincinnati, Ohio 45202 :

and :

B.B. :
c/o Daniel J. Buckley, Esq. :
Vorys Sater Seymour & Pease :
221 E. Fourth St., Suite 2000 :
Cincinnati, Ohio 45202 :

Defendants :

:

INTRODUCTORY ALLEGATIONS

1. On November 11, 2004, Denise Fairbanks was 17 years old, and she had been the victim of the sexual abuse by John Blanks, her biological father, for approximately 4 years. On that day, Denise learned that she was pregnant.

2. Denise decided to terminate her pregnancy, and an appointment was made for that procedure to be done at Planned Parenthood on November 15, 2004.

3. When Denise was at Planned Parenthood's clinic on November 15, 2004, she informed Defendant B.B., a Planned Parenthood employee, that she has been forced to do things she did not want to do. That communication by itself provided B.B. and Planned Parenthood with the information that required them to report that Denise was a victim of sexual abuse. In addition, other information known by Planned Parenthood and its employees caused Planned Parenthood, B.B. and other Planned Parenthood employees to know or suspect that Denise was a victim of sexual abuse. Tragically for Denise, Planned Parenthood's policies and practices, including its "don't ask/don't tell" policy, with respect to its duty to report known or suspected sexual abuse of

minors were in full force on November 15, 2004.

4. Planned Parenthood, Defendant B.B. and other Planned Parenthood employees did not report their knowledge or suspicion that Denise was a victim of sexual abuse. The Defendants' breach of their duties under RC 2151.421 resulted in Denise being subjected to the sexual abuse of her biological father which resumed and continued for another one and one-half years.

5. By this litigation Denise seeks damages to compensate her for the severe harm she has suffered as a direct result of Defendants' breach of their duties owed her under RC 2151.421. Denise also seeks an award of punitive damages because Defendants' conduct was reprehensible in that it was done in accordance with Planned Parenthood's policies, including its "don't ask/don't tell" policy, and as part of a pattern and practice of wrongful conduct. Denise seeks an award of punitive damages in an amount that will be sufficient to not only punish Defendants, but also to deter Planned Parenthood, its employees and others who have reporting duties under RC 2151.421 from engaging in this type of conduct.

PARTIES

6. Plaintiff Denise Fairbanks is and at all relevant times was a resident of the State of Ohio.

7. Defendant Planned Parenthood Southwest Ohio Region ("Planned Parenthood") is an Ohio corporation that in November, 2004 did business in Southwest Ohio, including Hamilton County, Ohio. Planned Parenthood operates a medical center at Auburn Avenue in Cincinnati, Ohio. At all relevant times, each Planned Parenthood employee who had contact with Denise was acting within the scope of her employment with Planned Parenthood.

8. Defendant Kade at all relevant times was Planned Parenthood's Medical Director,

and shared responsibility for developing and implementing Planned Parenthood's policies, procedures and training programs. At all relevant times, Kade supervised employees located at the Auburn Avenue medical facility, and was acting within the scope of her employment by Planned Parenthood. Kade is and at all relevant times was a resident of the State of Ohio. Counsel for Planned Parenthood have agreed to accept service of process of this Complaint on behalf of Defendant Kade.

9. Defendant A.M. at all relevant times was Planned Parenthood's Vice President of Patient Services. (As a courtesy to and by agreement with Planned Parenthood and A.M., A.M. is referred to by her initials.) A.M. shared responsibility for developing and implementing Planned Parenthood's policies and procedures at Planned Parenthood's Auburn Avenue facility, and was acting within the scope of her employment by Planned Parenthood. Denise states that, upon information and belief, A.M. is and at all relevant times was a resident of the State of Ohio. Counsel for Planned Parenthood have agreed to accept service of process of this Complaint on behalf of Defendant A.M.

10. Defendant L.P. at all relevant times was Manager of Planned Parenthood's Auburn Avenue medical facility. (As a courtesy to and by agreement with Planned Parenthood and L.P., L.P. is referred to by her initials.) At all relevant times, L.P. shared responsibility for developing and implementing policies and procedures and supervising employees at that center, and was acting within the scope of her employment by Planned Parenthood. Denise states that, upon information and belief, L.P. is and at all relevant times was a resident of the State of Ohio. Counsel for Planned Parenthood have agreed to accept service of process of this Complaint on behalf of Defendant L.P.

11. Defendant Julia Piercey (“Piercey”) at all relevant times was Planned Parenthood’s Vice President of Education and Training. At all relevant times, Piercey was in charge of developing training programs for Planned Parenthood employees, including training with respect to the duty to report knowledge or suspicion of sexual abuse of minors, and was acting within the scope of her employment by Planned Parenthood. Denise states that, upon information and belief, Piercey was at all relevant times a resident of the State of Ohio. Counsel for Planned Parenthood have agreed to accept service of process of this Complaint on behalf of Defendant Piercey.

12. Defendant B.B. at all relevant times was an employee of Planned Parenthood who worked at its Auburn Avenue medical center. (As a courtesy to and by agreement with Planned Parenthood and B.B., B.B. is referred to by her initials.) On November 15, 2004, Denise met with B.B. at Planned Parenthood’s Auburn Avenue medical facility, and she informed B.B. that she had become pregnant as a result of force. B.B. did not report this disclosure of sexual abuse as she was required to do under RC 2151.421. At all relevant times, B.B. was acting within the scope of her employment by Planned Parenthood. Denise states that, upon information and belief, B.B. was at all relevant times a resident of the State of Ohio. Counsel for Defendant Planned Parenthood have agreed to accept service of process of this Complaint on behalf of B.B.

JURISDICTION AND VENUE

13. Denise incorporates paragraphs 1 through 12 as if fully rewritten herein.
14. All contacts that Defendants had with Denise occurred in Hamilton County, Ohio.
15. Most, if not all, of the Defendants’ conduct that forms some or all of the grounds for Denise’s claims against Defendants occurred in Hamilton County, Ohio.
16. Both jurisdiction and venue are proper.

STATEMENT OF UNDERLYING FACTS

Blanks' Pre-November 11, 2004

Abuse Of Denise

17. Commencing in 2000, Blanks began sexually abusing Denise, who was 13 years old at that time.

18. During the entire time Blanks sexually abused Denise, they lived together in the same residence, and Blanks was the only adult who resided at the residence.

Denise's Discovery Of Her Pregnancy

19. In late October or early November, 2004, Denise began having what she believed were stomach aches and related problems.

20. On November 11, 2004, Denise learned that she was pregnant and suffering from a sexually transmitted infection ("STI").

21. Blanks made an appointment with Planned Parenthood for Denise to have an abortion on November 15, 2004.

Planned Parenthood's Pre-November 15, 2004

Knowledge That The Majority Of Its Minor

Patients Who Were Pregnant Or Suffering From A Sexually Transmitted Infection Were Probably Victims Of Sexual Abuse

22. On November 15, 2004, Planned Parenthood had many sources of information, including its own training materials, that informed it and its employees of when a Planned Parenthood's patient was probably a victim of sexual abuse.

23. When Denise arrived at Planned Parenthood's clinic on November 15, 2004, Planned Parenthood had the following information in its own training files and knew that:

- a. Nearly 70% of all babies born to teenage girls are fathered by men older than 20

years old.

- b. The majority of teenage girls infected with a STI are infected by adult males.
- c. Adult men father over 50% of babies born to girls 15-17 years old.
- d. Sexual activity by minors at an early age is associated with non-voluntary sexual activity.
- e. Teens who have sexual partners who are six or more years older are nearly four times more likely to become pregnant than teens who date someone within 2 years of their age.
- f. Approximately 70% of all sexual assaults are committed by someone the victim knows.

24. On November 15, 2004, Planned Parenthood knew that, when a pregnant minor such as Denise appeared at its clinic, it was probable that the father of the baby was an adult.

25. Planned Parenthood also knew that, when a minor such as Denise appeared at its clinic infected with an STI, it was probable that she had been infected by an adult male.

**Planned Parenthood's Conduct From
January 1, 2000 Through December 31, 2004**

26. Prior to November 15, 2004, Planned Parenthood encouraged minors *not* to provide the information that would trigger Planned Parenthood's duty to report the sexual abuse of minors. This encouragement included coaching minors on what *not* to say and what information *not* to disclose. It also included Planned Parenthood's policy and practice *not* to ask the minors to provide what probably is the most important piece of information - i.e., the age of the sexual partner - to determine whether the minor is a victim of sexual abuse.

27. Prior to November 15, 2004, Planned Parenthood and its employees intentionally ignored and failed to follow up on information provided by minors that would cause them to know or suspect that the minors were victims of sexual abuse.

28. Planned Parenthood and its employees, even after having been informed by minor girls that they were in sexual relationships with adult males, instructed the minors what to do to obtain birth control to continue their abusive relationships and enable them to conceal the relationships from their parents.

29. Planned Parenthood's training and supervision of its employees is intentionally, recklessly and/or negligently designed so that its employees make reports of known or suspected sexual abuse of minors only when Planned Parenthood has failed in its attempts to coach or convince the minors not to disclose information that triggers its duty to report.

30. Between January 1, 2000 and December 31, 2004, Planned Parenthood did not make a single report of suspected sexual abuse of a minor.

31. Upon information and belief, Denise alleges that, between January 1, 2000 and December 31, 2004, Planned Parenthood made reports of known or suspected sexual abuse of its minor patients in less than 5% of the situations in which those minors were suffering from a STI even though it knew from its own training materials that 50% or more of those girls had been infected by adult males.

32. Upon information and belief, Denise alleges that between January 1, 2000 and December 31, 2004, Planned Parenthood made reports of known or suspected sexual abuse of its minor patients in less than 5% of the situations in which those minors were pregnant even though it knew from its own training materials that 50% or more of those girls had become impregnated

by adult males.

**Planned Parenthood's Policies And Practices With Respect To
Reporting Known Or Suspected Sexual Abuse Of Minors**

33. Defendants Kade, A.M., Piercey and L.P. were the Planned Parenthood employees responsible for the creation and implementation of Planned Parenthood's policies and practices that existed in November, 2004, including the policies and practices relating to RC 2151.421 ("the RC 2151.421 Policies").

34. On numerous occasions between January 1, 2000 and November 15, 2004, and as a direct result of its RC 2151.421 Policies, Planned Parenthood breached its duties to make a report pursuant to RC 2151.421.

35. Defendants Kade, A.M., Piercey and L.P. knew or recklessly and/or negligently ignored that its RC 2151.421 Policies that existed in November, 2004 were deficient and the implementation of those policies had resulted in the breach by Planned Parenthood's employees of their reporting duties under RC 2151.421.

36. Planned Parenthood had a "don't ask, don't tell" policy with respect to its duty to report known or suspected abuse of minors. In furtherance of that policy, Planned Parenthood created forms and procedures designed to make it very unlikely that its patients would disclose information that would trigger its duty to make reports of known or suspected sexual abuse of a minor.

37. All acts and omissions of Planned Parenthood's employees referred to in this Complaint were done in accordance with the deficient RC 2151.421 Policies created, established, communicated, implemented and enforced by Defendants Kade, A.M. Piercey and/or L.P. The RC

2151.421 Policies and their implementation are part of a pattern and practice of wrongdoing by Planned Parenthood.

38. Some or all damages sustained by Denise as a result of Defendants' acts and omissions referred to in the Complaint were caused, in whole or in part, by Planned Parenthood's deficient RC 2151.421 Policies.

**Planned Parenthood's Deficient Training And Supervision Of Its
Employees With Respect To Reporting Known Or
Suspected Sexual Abuse Of Minors**

39. In 2004 Defendants Kade, Piercey and L.P. were the Planned Parenthood employees in charge of developing the training programs for and supervision of Planned Parenthood employees at the Auburn Avenue facility.

40. Defendants Kade's, Piercey's and L.P.'s duties included developing the program used to train Planned Parenthood's employees, including Defendant B.B., in connection with their duties to comply with RC 2151.421.

41. The training program developed by Defendants Kade, Piercey and L.P. in connection with RC 2151.421 that was in place in November, 2004 was deficient as a result of Planned Parenthood's, and Defendants' Kade's, Piercey's and L.P.'s negligence, recklessness and/or intentional wrongdoing. These Planned Parenthood Defendants knew that the deficiencies in training would result in the failure to report known or suspected sexual abuse of minors, and was done as part of their pattern and practice or wrongdoing.

42. The supervision of Planned Parenthood's employees with respect to their duties under RC 2151.421 that was in place in November, 2004 was intentionally, recklessly and/or negligently deficient, and was done as part of Planned Parenthood's pattern and practice of

wrongdoing.

43. Some or all damages sustained by Denise as a result of these Planned Parenthood Defendants' acts and omissions referred to in the Complaint were caused, in whole or in part, by the deficiencies in the training and supervision of Planned Parenthood employees, including Defendant B.B., who worked at its Auburn Avenue medical center.

November 15, 2004

44. Blanks arranged for Denise to undergo an abortion at Planned Parenthood's Auburn Avenue medical facility.

45. On November 15, 2004, Blanks accompanied Denise to Planned Parenthood's Auburn Avenue facility for the purpose of Denise having an abortion.

46. In connection with the abortion, Planned Parenthood required certain forms be completed. Although Denise signed some of the forms, they were completed by Blanks, and Denise did not read them.

47. Based on the information provided by Blanks, Planned Parenthood learned that Denise was a minor (age 17) and pregnant. With that information alone, Planned Parenthood knew that there was a statistical probability (i.e. a likelihood) that Denise's sexual partner was an adult male.

48. Planned Parenthood also learned that Denise was suffering from an STI. That information alone notified Planned Parenthood that there was a statistical probability (i.e. a likelihood) that Denise had been sexually active with and infected by an adult.

49. Before the abortion had been performed, Denise met with Defendant B.B. During that meeting Defendant B.B. spoke to Denise about her (Denise's) need to use birth control when she engaged in sexual activity. In response to Defendant B.B.'s statements, Denise told her that she was forced to do things she did not want to do. When Denise made this statement, Defendant B.B. knew or suspected, or, if she had been properly trained, would have known or suspected, that Denise was a victim of sexual abuse.

50. Planned Parenthood and certain of its employees, including Defendant B.B., did not report their knowledge or suspicion of the sexual abuse of Denise as they were required to do under RC 2151.421.

51. The failure of Planned Parenthood and its employees, including Defendant B.B., to report their knowledge or suspicion of the sexual abuse of Denise is a violation of their duties under RC 2151.421.

52. As a direct and proximate result of Planned Parenthood's and its employees' failure to report their knowledge or suspicion of the sexual abuse of Denise, Blanks was able to continue his sexual abuse of Denise for approximately one and one-half years.

Blanks' Criminal Conviction

53. In the spring of 2006 and approximately one and one-half years after Planned Parenthood and its employees breached their duty to report their knowledge or suspicion that Denise was a victim of sexual abuse, Denise told her future college basketball coach of the abuse by her father. The coach reported the abuse to a law enforcement agency, the action which Defendants were required to take in November, 2004.

54. The ensuing investigation of Blanks' sexual abuse of Denise conducted by law enforcement and the Hamilton County, Ohio and Warren County, Ohio Prosecuting Attorneys put

a stop to Blanks' sexual abuse of Denise and resulted in criminal charges being brought against him. Blanks was found guilty of sexual battery, for which he is currently imprisoned.

DAMAGES

55. As a direct and proximate result of the Defendants' acts and omissions described in this Complaint, the sexual abuse of Denise by her father went without being reported to law enforcement for approximately one and one-half years. During this period of time, Blanks repeatedly sexually abused Denise.

56. Each sexual assault by Blanks would have been prevented had Defendants fulfilled their duties under RC 2151.421, and each caused significant damage to Denise. The aggregate of these assaults over a year and one-half period have caused severe emotional and psychological trauma and injury to Denise.

57. As a direct and proximate result of the Defendants' acts and omissions described in this Complaint, Denise has suffered severe and permanent emotional and psychological injuries, including but not limited to depression, post-traumatic stress disorders, anxiety, pain, suffering, inability to engage in healthy and normal relationships and an inability to form therapeutic relations with psychological professionals. All of Denise's emotional and psychological damages are permanent.

58. As a further direct and proximate result of the Defendants' acts and omissions described in this Complaint, Denise has incurred, and will in the future incur, expenses for psychological and other treatment or attempts at therapy.

59. The actions and omissions of the Defendants as described in this Complaint were done intentionally and/or so recklessly as to warrant the imposition of punitive damages against

them to punish them for their acts and failures and to serve as a deterrent to them and others from engaging in such conduct.

FIRST CAUSE OF ACTION
(AGAINST DEFENDANTS PLANNED PARENTHOOD AND B.B.)

60. Denise incorporates paragraphs 1 through 59 as if fully rewritten herein.

61. On November 15, 2004, Planned Parenthood and its employees, including Defendant B.B., had a duty under RC 2151.421 to report known or suspected sexual abuse of minors.

62. During all times that Defendant B.B. and other Planned Parenthood employees dealt and/or communicated with Denise, they were acting in their capacities as employees of Planned Parenthood and within the scope of their employment.

63. Planned Parenthood, through Defendant B.B. and other Planned Parenthood employees who dealt and/or communicated with Denise, knew or suspected that Denise was a victim of sexual abuse.

64. At no time did Defendant B.B. or any other Planned Parenthood employee report her knowledge or suspicion that Denise was a victim of sexual abuse as they were required to do under RC 2151.421.

65. The failure on the part of Defendant B.B. and Planned Parenthood employees to report their knowledge or suspicion that Denise was a victim of sexual abuse is a breach of their duties under RC 2151.421.

66. On the basis of *respondeat superior*, Planned Parenthood breached its duties under RC 2151.421.

67. As a direct and proximate result of Planned Parenthood's, Defendant B.B.'s and Planned Parenthood's other employees' breaches of their duties under RC 2151.421:

a. Blanks's sexual abuse of Denise remained concealed, which enabled Blanks to continue to sexually abuse her for almost one and one-half years; and

b. Denise has suffered the damages described in paragraphs 55 through 59, above.

SECOND CAUSE OF ACTION
(AGAINST DEFENDANTS PLANNED PARENTHOOD
KADE, PIERCEY, A.M. AND L.P.)

68. Denise incorporates paragraphs 1 through 67 as if fully rewritten herein.

69. All damages sustained by Denise referred to in this Complaint were caused, in whole or in part, by Planned Parenthood's intentionally or recklessly deficient RC 2151.421 Policies and/or Defendants Kade's, Piercey's, A.M.'s and/or L.P.'s intentional, reckless and/or negligent implementation of those Policies.

70. All damages sustained by Denise referred to in this Complaint were caused, in whole or in part, by Planned Parenthood's intentionally or recklessly and/or negligently deficient training of Planned Parenthood's employees.

71. All damages sustained by Denise referred to in this Complaint were caused, in whole or in part, by Planned Parenthood's and Defendants Kade's and L.P.'s negligent and/or reckless supervision of Planned Parenthood's employees.

72. Defendants Kade, Piercey, A.M. and L.P. were at all relevant times acting in their capacities as Planned Parenthood's employees.

73. On the basis of *respondeat superior*, Planned Parenthood breached its duties under RC 2151.421.

74. As a direct and proximate result of Planned Parenthood's RC 2151.421 Policies and deficient training and supervision of Planned Parenthood's employees:

a. Blanks's sexual abuse of Denise remained concealed, which enabled Blanks to continue to sexually abuse her for almost one and one-half years; and

b. Denise has suffered the damages described in paragraphs 55 through 59, above.

THIRD CAUSE OF ACTION
(AGAINST ALL DEFENDANTS)

75. Denise incorporates paragraphs 1 through 74 as if fully rewritten herein.

76. The Defendants' conduct as set forth in this Complaint was so extreme and outrageous that it goes beyond the bounds of decency, and it is utterly intolerable in a civilized community.

77. The Defendants' acts and omissions as set forth in this Complaint were intentional and reckless, done in knowing violation of Ohio law, and done to subvert and circumvent Denise's rights. These acts and omissions demonstrate a flagrant disregard for Denise's safety, and caused the infliction of emotional distress on Denise.

78. As a direct and proximate result of the Defendants' conduct:

a. Blanks's sexual abuse of Denise remained concealed, which enabled Blanks to continue to sexually abuse her for almost one and one-half years; and

b. Denise has suffered the damages described in paragraphs 55 through 59, above.

FOURTH CAUSE OF ACTION
(AGAINST ALL DEFENDANTS)

79. Denise incorporates paragraphs 1 through 78 as if fully rewritten herein.

80. Defendants' negligent acts and omissions as set forth in this Complaint caused the infliction of emotional distress on Denise.

81. As a direct and proximate result of the Defendants' conduct:

a. Blanks's sexual abuse of Denise remained concealed, which enabled Blanks to continue to sexually abuse her for almost one and one-half years; and

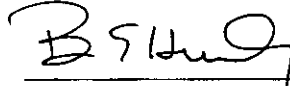
b. Denise has suffered the damages described in paragraphs 55 through 59, above.

WHEREFORE, Plaintiff Denise Fairbanks demands judgment in the following form:

1. compensatory damages in an amount not less than \$25,000.00;
2. punitive damages in an amount not less than the amount of compensatory damages awarded;
3. her attorneys' fees and costs; and
4. all other relief to which she may be entitled.

Respectfully submitted,

CRABBE, BROWN & JAMES LLP



By: Brian E. Hurley (0007827)

Robert J. Gehring (0019329)

Daniel J. Hurley (0034499)

30 Garfield Place, Suite 740

Cincinnati, OH 45202

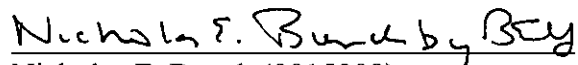
(513) 784-1525 (Telephone)

(513) 784-1250 (Facsimile)

bhurley@cbjlawyers.com

rgehring@cbjlawyers.com

Co-counsel for Plaintiff Denise Fairbanks



Nicholas E. Bunch (0015008)

White Getgey & Meyer Co. LPA

Fourth & Vine Tower

1 W. Fourth Street, Suite 1700

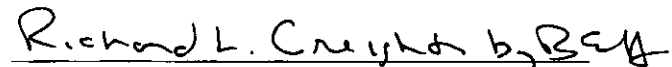
Cincinnati, OH 45202

(513) 241-3685 (Telephone)

(513) 241-2399 (Facsimile)

nbunch@wgmlpa.com

Co-counsel for Plaintiff Denise Fairbanks



Richard L. Creighton, Jr. (0021806)

William A. Posey (0021821)

Keating, Muething & Klekamp PLL

One East Fourth Street

Suite 1400

Cincinnati, OH 45202

(513) 579-6513 (Telephone)

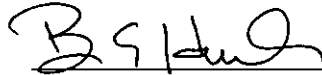
(513) 579-6457 (Facsimile)

rcreighton@kmklaw.com

Co-counsel for Plaintiff Denise Fairbanks

JURY DEMAND

Plaintiff demands a jury trial on all claims that can be tried to a jury.



Brian E. Hurley (0007827)

TO THE CLERK:

Please serve the Defendants at the following addresses:

PLANNED PARENTHOOD SOUTHWEST
OHIO REGION
Serve: Statutory Agent
Alphonse A. Gerhardstein
1409 Enquirer Building
617 Vine Street
Cincinnati, OH 45202

A.M.
c/o Daniel J. Buckley, Esq.
Vorys Sater Seymour & Pease
221 E. Fourth St., Suite 2000
Cincinnati, Ohio 45202

ROSLYN KADE, M.D.
c/o Daniel J. Buckley, Esq.
Vorys Sater Seymour & Pease
221 E. Fourth St., Suite 2000
Cincinnati, Ohio 45202

B.B.
c/o Daniel J. Buckley, Esq.
Vorys Sater Seymour & Pease
221 E. Fourth St., Suite 2000
Cincinnati, Ohio 45202

JULIA PIERCEY
c/o Daniel J. Buckley, Esq.
Vorys Sater Seymour & Pease
221 E. Fourth St., Suite 2000
Cincinnati, Ohio 45202

L.P.
c/o Daniel J. Buckley, Esq.
Vorys Sater Seymour & Pease
221 E. Fourth St., Suite 2000
Cincinnati, Ohio 45202