

Ashley Partlow  
3014 Matthews Street  
Baltimore, MD 21218

Plaintiff

vs.

Ruth Marie Mayo, Individually and as  
Trustee of the George and Marie Mayo  
Living Trust  
231 N. Duncan Street  
Baltimore, MD 21231

and

The Estate of Ruth Marie Mayo  
231 N. Duncan Street  
Baltimore, MD 21231

and

George A. Mayo, Individually and as  
Trustee of the George and Marie Mayo  
Living Trust  
231 N. Duncan Street  
Baltimore, MD 21231

and

The Estate of George A. Mayo  
231 N. Duncan Street  
Baltimore, MD 21231

and

George and Marie Mayo Living Trust  
231 N. Duncan Street  
Baltimore, MD 21231

and

Linden Lakeview Properties, Inc.  
2517 Linden Avenue  
Baltimore, MD 21217

\* IN THE  
\* CIRCUIT COURT  
\* FOR  
\* BALTIMORE CITY

1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the problem and the objectives of the research.

2. The second part of the report is a detailed description of the methods used in the study. It includes a discussion of the experimental design, the data collection procedures, and the statistical analysis techniques.

3. The third part of the report is a presentation of the results of the study. It includes a discussion of the findings, a comparison of the results with previous research, and a conclusion about the significance of the study.

4. The fourth part of the report is a discussion of the implications of the study. It includes a discussion of the practical applications of the findings and a suggestion for further research.

5. The fifth part of the report is a summary of the study. It includes a brief overview of the main findings and a statement of the conclusions.

6. The sixth part of the report is a list of references. It includes a list of the books, articles, and other sources used in the study.

7. The seventh part of the report is an appendix. It includes a list of the tables, figures, and other supplementary material.

8. The eighth part of the report is a glossary. It includes a list of the terms used in the study and their definitions.

and \*

Max Slaybough, Individually and as  
President of Linden-Lakeview  
Properties, Inc. \*  
2517 Linden Avenue \*  
Baltimore, MD 21217 \*

and \*

The Estate of Max Slaybough \*  
2517 Linden Avenue \*  
Baltimore, MD 21217 \*

and \*

Lawrence M. Polakoff \*  
1906 E. Federal Street \*  
Baltimore, MD 21213 \*

and \*

CFOD-2 Limited Partnership \*  
1906 E. Federal Street \*  
Baltimore, MD 21213 \*

and \*

Chase Management Inc. \*  
1906 E. Federal Street \*  
Baltimore, MD 21213 \*

and \*

CFSP Limited Partnership \*  
1906 E. Federal Street \*  
Baltimore, MD 21213 \*

and \*

Kennedy Krieger Institute, Inc. \*  
(a Maryland Corporation) \*  
707 N. Broadway \*  
Baltimore, MD 21205 \*

and \*

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Environmental Restorations, Inc.  
301 Commerce Drive, Suite 107  
Baltimore, MD 21227

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and

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The Johns Hopkins Hospital  
600 N. Wolfe Street  
Baltimore, MD 21205

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and

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Johns Hopkins University  
3400 N. Charles Street  
Baltimore, MD 21218

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and

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Johns Hopkins University School  
of Medicine  
3400 N. Charles Street  
Baltimore, MD 21218

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Johns Hopkins University School  
of Public Health  
3400 N. Charles Street  
Baltimore, MD 21218

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Defendants

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## COMPLAINT

Come now the Plaintiff(s), by their Attorney, Saul E. Kerpelman, and sue  
the Defendant(s).

## FIRST COUNT

1. For that all of the time mentioned herein the Defendant, Ruth Marie  
Mayo, Individually and as Trustee of the George and Marie Mayo Living Trust,

1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the study and the objectives of the research.

2. The second part of the report is a detailed description of the methodology used in the study. It includes information about the sample size, the data collection methods, and the statistical analysis techniques.

3. The third part of the report is a discussion of the results of the study. It presents the findings of the research and discusses their implications for the field of study.

4. The fourth part of the report is a conclusion and a list of references. The conclusion summarizes the main findings of the study and provides recommendations for future research. The references list the sources of information used in the study.

5. The fifth part of the report is an appendix containing additional information related to the study. This may include raw data, detailed calculations, or other supporting materials.

Appendix A

Appendix B

Appendix C

Appendix D

Appendix E

owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 231 N. Duncan Street, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 231 N. Duncan Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1988 - 1994.

4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

the present time, the Government is not in a position to  
undertake a large-scale program of reconstruction. It is  
necessary to first stabilize the economy and to ensure that  
the basic needs of the population are met. This requires  
a concerted effort by all sectors of society.

The Government is committed to the principle of  
self-reliance and to the development of a strong  
national economy. It is necessary to attract foreign  
investment and to encourage the growth of the private  
sector. This will require a series of reforms and  
a change in the current economic policy.

The Government is also committed to the principle of  
social justice and to the improvement of the living  
conditions of the people. It is necessary to invest in  
education, health care, and social services. This will  
require a change in the current social policy and a  
series of reforms.

The Government is also committed to the principle of  
peace and to the resolution of conflicts through  
dialogue and negotiation. It is necessary to establish  
a framework for the resolution of disputes and to  
encourage the participation of all parties in the  
process.

The Government is also committed to the principle of  
democracy and to the establishment of a strong  
legal system. It is necessary to ensure that the  
rights of the people are protected and that the  
Government is accountable to the people.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

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f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was

[illegible]

1. The first step in the process of the  
 2. investigation is the identification of the  
 3. subject of the investigation. This is done  
 4. by the investigator who is assigned to the  
 5. case. The investigator will then conduct a  
 6. thorough search of the records of the  
 7. subject. This will include a review of the  
 8. subject's criminal record, if any, and a  
 9. review of the subject's financial records.  
 10. The investigator will also interview the  
 11. subject and any other persons who may have  
 12. information regarding the subject. The  
 13. results of the investigation will be  
 14. reported to the appropriate authorities.  
 15. The investigation will continue until the  
 16. subject is identified and the appropriate  
 17. action is taken.

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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.



aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and

The first of these is the fact that the  
 government has been unable to raise the  
 necessary funds to meet its obligations.  
 This is due to a combination of factors,  
 including a decline in tax revenue and  
 an increase in government spending.  
 The second major problem is the  
 high level of inflation, which has  
 eroded the value of the currency and  
 led to a loss of confidence in the  
 government. This has resulted in a  
 sharp decline in foreign investment  
 and a loss of international credit.  
 The third problem is the lack of  
 political stability, which has led to  
 a series of military coups and  
 civil unrest. This has further  
 weakened the government and has  
 led to a loss of control over the  
 country.

adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was

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hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

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1. The first step in the process of identifying a problem is to define the problem. This involves identifying the symptoms of the problem and determining the scope of the problem. Once the problem has been defined, the next step is to identify the causes of the problem. This involves identifying the factors that are contributing to the problem and determining the root cause of the problem. Once the causes of the problem have been identified, the next step is to develop a plan to address the problem. This involves identifying the actions that need to be taken to address the problem and determining the resources that will be needed to implement the plan. Once a plan has been developed, the next step is to implement the plan. This involves taking the actions that have been identified in the plan and putting them into practice. Finally, the last step in the process is to evaluate the results of the plan. This involves determining whether the plan has been successful in addressing the problem and identifying any areas for improvement.

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Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

## SECOND COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, Ruth Marie Mayo, Individually and as Trustee of the George and Marie Mayo Living Trust, by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendant therefore violated the Consumer Protection Act.

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the study. The investigator must first identify the problem and then determine the scope of the study. The next step is to design the study. This involves determining the methods to be used and the data to be collected. The third step is to collect the data. This is done by the investigator who is responsible for the study. The fourth step is to analyze the data. This is done by the investigator who is responsible for the study. The fifth step is to interpret the results. This is done by the investigator who is responsible for the study. The sixth step is to write the report. This is done by the investigator who is responsible for the study. The seventh step is to present the results. This is done by the investigator who is responsible for the study. The eighth step is to discuss the results. This is done by the investigator who is responsible for the study. The ninth step is to conclude the study. This is done by the investigator who is responsible for the study. The tenth step is to publish the results. This is done by the investigator who is responsible for the study.



7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

### THIRD COUNT

1. For that all of the time mentioned herein the Decedent of the Defendant, The Estate of Ruth Marie Mayo, owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 231 N. Duncan Street, in the City of Baltimore, State of Maryland which the Decedent either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Decedent, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Decedent at the 231 N. Duncan Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1988 - 1994.

4. Both before and after the time the Plaintiff moved into the dwelling, the Decedent had either caused or allowed the continued existence of paint

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containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Decedent in applying lead based paint in the dwelling.

b) The negligence of the Decedent and/or the Decedent's agents in failing to warn the Plaintiffs of the lead hazard which the Decedent and/or the Decedent's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Decedent in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Decedent and/or the Decedent's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and

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peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Decedent in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Decedent or his agents knew or had reason to know that the paint was lead based paint and the Decedent or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Decedent and/or the Decedent's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Decedent and/or the Decedent's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Decedent in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Decedent and/or the Decedent's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.



i) The Decedent and/or the Decedent's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Decedent or the agent, servant or employee of the Decedent who managed the property for the Decedent was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Decedent was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Decedent's agents possessed such knowledge as a result of all the sources listed preceding.





In addition the Decedent and/or workmen/agents of the Decedent visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Decedent and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Decedent was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving

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 government has been unable to raise the  
 necessary funds to meet its obligations.  
 This has been due to a combination of  
 factors, including a decline in tax  
 revenues and an increase in government  
 spending. The second factor is the  
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 eroded the value of the government's  
 debt. Finally, the government has  
 been unable to attract foreign  
 investment, which has further  
 exacerbated its financial problems.

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aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

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1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is assigned to the case. The investigator will then conduct a thorough search of the records to determine the facts of the case.

2. The second step is the collection of evidence. This is done by the investigator who will go to the scene of the crime and collect any items that may be of use. This includes fingerprints, footprints, and any other items that may be found.

3. The third step is the analysis of the evidence. This is done by the investigator who will examine the items collected and determine if they are of any value. This may involve the use of scientific methods to determine the age of the items or the identity of the person who left them.

4. The fourth step is the presentation of the evidence. This is done by the investigator who will prepare a report of the findings and present it to the court. The report will include a description of the evidence, the results of the analysis, and the investigator's conclusions.

5. The fifth step is the final decision. This is made by the court, which will decide if the evidence is sufficient to prove the case. If the evidence is sufficient, the court will enter a verdict and the case will be closed.

1. What is the purpose of the study?

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Decedent.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### FOURTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Decedent, The Estate of Ruth Marie Mayo, by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland

1. The first part of the report is a general introduction to the project.

2. The second part of the report is a detailed description of the project.

3. The third part of the report is a discussion of the results of the project.

4. The fourth part of the report is a conclusion and recommendations.

5. The fifth part of the report is a list of references.

6. The sixth part of the report is a list of appendices.

7. The seventh part of the report is a list of figures.

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and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Decedent and/or the Decedent's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Decedent therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Decedent's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### FIFTH COUNT

1. For that all of the time mentioned herein the Defendant, George A. Mayo, Individually and as Trustee of the George and Marie Mayo Living Trust, owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 231 N. Duncan Street, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said





property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 231 N. Duncan Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1988 - 1994.

4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant

1. The first part of the report is a general introduction to the subject.

2. The second part is a detailed description of the methods used.

3. The third part is a discussion of the results obtained.

4. The fourth part is a conclusion and a list of references.

5. The fifth part is an appendix containing supplementary material.

6. The sixth part is a summary of the main findings.

7. The seventh part is a list of abbreviations and symbols.

8. The eighth part is a list of figures and tables.

9. The ninth part is a list of footnotes.

10. The tenth part is a list of references.

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23. The twenty-third part is a list of appendices.

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25. The twenty-fifth part is a list of footnotes.

and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property

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owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the situation.

2. Once the problem is identified, the next step is to define the objectives and goals of the project. This helps to clarify what is to be achieved and provides a clear direction for the work.

3. The third step is to develop a plan or strategy to address the problem. This involves identifying the resources available, the tasks to be completed, and the timeline for the project.

4. The fourth step is to implement the plan. This involves putting the strategy into action and monitoring progress as the project moves forward.

5. The final step is to evaluate the results of the project. This involves assessing whether the objectives have been met and identifying any lessons learned for future projects.

[illegible]

1. The first part of the document is a list of names and their corresponding addresses. The names are listed in the first column, and the addresses are listed in the second column. The names are: John Doe, Jane Smith, and Bob Johnson. The addresses are: 123 Main St, 456 Elm St, and 789 Oak St.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.



1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the study. The investigator must first identify the problem and then determine the scope of the study. The next step is to design the study. This involves determining the variables to be studied and the methods to be used. The third step is to collect data. This is done by the investigator who is responsible for the study. The data is then analyzed and the results are reported.

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the investigation. The investigator must identify the problem and the scope of the investigation.

2. The second step is the collection of data. This is done by the investigator who is responsible for the investigation. The investigator must collect data from the sources that are available to him or her.

3. The third step is the analysis of the data. This is done by the investigator who is responsible for the investigation. The investigator must analyze the data and determine the results of the investigation.

4. The fourth step is the presentation of the results. This is done by the investigator who is responsible for the investigation. The investigator must present the results of the investigation to the appropriate authorities.

5. The fifth step is the evaluation of the results. This is done by the investigator who is responsible for the investigation. The investigator must evaluate the results of the investigation and determine the effectiveness of the investigation.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### SIXTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

[illegible]

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, George A. Mayo, Individually and as Trustee of the George and Marie Mayo Living Trust, by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendant therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### SEVENTH COUNT

1. The first part of the report is a general introduction to the subject.

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3. The third part is a discussion of the results of the study.

4. The fourth part is a conclusion and a list of references.

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11. The eleventh part is a list of appendices.

12. The twelfth part is a list of figures and tables.

13. The thirteenth part is a list of abbreviations.

1. For that all of the time mentioned herein the Decedent of the Defendant, The Estate of George A. Mayo, owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 231 N. Duncan Street, in the City of Baltimore, State of Maryland which the Decedent either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Decedent, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Decedent at the 231 N. Duncan Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1988 - 1994.

4. Both before and after the time the Plaintiff moved into the dwelling, the Decedent had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

[illegible]

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Decedent in applying lead based paint in the dwelling.

b) The negligence of the Decedent and/or the Decedent's agents in failing to warn the Plaintiffs of the lead hazard which the Decedent and/or the Decedent's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Decedent in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Decedent and/or the Decedent's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Decedent in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Decedent or his



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agents knew or had reason to know that the paint was lead based paint and the Decedent or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Decedent and/or the Decedent's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Decedent and/or the Decedent's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Decedent in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Decedent and/or the Decedent's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Decedent and/or the Decedent's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

2. Next, it is important to gather relevant information and data. This can be done through research, consultation with experts, or by analyzing existing data sets.

3. Once the information is gathered, the next step is to analyze it. This involves identifying patterns, trends, and relationships that can help in understanding the problem.

4. After analysis, the next step is to develop a solution or plan. This involves identifying the most effective approach to solve the problem and outlining the steps to be taken.

5. Finally, the solution is implemented and the results are evaluated. This involves monitoring the progress of the solution and making adjustments as needed to ensure that the problem is solved.

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1. The first step in the process of the investigation is to identify the problem.	2. The second step is to gather information about the problem.	3. The third step is to analyze the information and identify the causes of the problem.	4. The fourth step is to develop a plan of action to solve the problem.	5. The fifth step is to implement the plan and monitor the results.
6. The sixth step is to evaluate the results and determine if the problem has been solved.	7. The seventh step is to document the findings and conclusions of the investigation.	8. The eighth step is to communicate the results to the appropriate parties.	9. The ninth step is to review the process and make any necessary improvements.	10. The tenth step is to close the investigation and return the system to normal operation.

7. At all times mentioned herein the Decedent or the agent, servant or employee of the Decedent who managed the property for the Decedent was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Decedent was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Decedent's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Decedent and/or workmen/agents of the Decedent visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

[illegible]

Complaints regarding the deteriorated paint were also made to the Decedent and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Decedent was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

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11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.



1. The first step in the process of the development of a new product is the identification of a market need. This is often done through market research, which can be conducted in a variety of ways, including surveys, focus groups, and interviews. The goal is to understand what customers want and what problems they are trying to solve.

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the investigation. The investigator must identify the problem and the scope of the investigation. The investigator must also identify the objectives of the investigation and the methods to be used.

2. The second step in the process of the investigation is the collection of data. This is done by the investigator who is responsible for the investigation. The investigator must collect data from the sources identified in the first step. The investigator must also collect data from the sources identified in the first step.

3. The third step in the process of the investigation is the analysis of the data. This is done by the investigator who is responsible for the investigation. The investigator must analyze the data collected in the second step. The investigator must also analyze the data collected in the second step.

4. The fourth step in the process of the investigation is the interpretation of the results. This is done by the investigator who is responsible for the investigation. The investigator must interpret the results of the analysis in the third step. The investigator must also interpret the results of the analysis in the third step.

5. The fifth step in the process of the investigation is the reporting of the results. This is done by the investigator who is responsible for the investigation. The investigator must report the results of the investigation to the appropriate authorities. The investigator must also report the results of the investigation to the appropriate authorities.

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13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Decedent.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### EIGHTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Decedent, The Estate of George A. Mayo, by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Decedent and/or the Decedent's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

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6. The Decedent therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Decedent's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### NINTH COUNT

1. For that all of the time mentioned herein the Defendant, George and Marie Mayo Living Trust, owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 231 N. Duncan Street, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 231 N. Duncan Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1988 - 1994.

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4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or

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illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or



I have been thinking of you very much lately, and wondering how you are getting on. I hope you are well and happy. I have been very busy lately, but I have managed to find some time to write to you. I have been thinking of you very much lately, and wondering how you are getting on. I hope you are well and happy. I have been very busy lately, but I have managed to find some time to write to you.

inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the

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Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body,

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is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

The first of these is the fact that the number of people who are employed in the service sector has increased steadily over the last few decades. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The second factor is the fact that the service sector is becoming increasingly important in the economy. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The third factor is the fact that people are increasingly working in the service sector. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The fourth factor is the fact that the service sector is becoming increasingly important in the economy. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The fifth factor is the fact that people are increasingly working in the service sector. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The sixth factor is the fact that the service sector is becoming increasingly important in the economy. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The seventh factor is the fact that people are increasingly working in the service sector. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The eighth factor is the fact that the service sector is becoming increasingly important in the economy. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The ninth factor is the fact that people are increasingly working in the service sector. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector. The tenth factor is the fact that the service sector is becoming increasingly important in the economy. This is due to a number of factors, including the fact that the service sector is becoming increasingly important in the economy, and the fact that people are increasingly working in the service sector.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### TENTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, George and Marie Mayo Living Trust, by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of



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Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendant therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### ELEVENTH COUNT

1. For that all of the time mentioned herein the Defendant, Linden-Lakeview Properties, Inc., owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 2517 Linden Avenue, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said

1. The Government of the United States of America, hereinafter referred to as the "Government,"

2. The Government of the United States of America, hereinafter referred to as the "Government,"

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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

1. Mr. J. Edgar Hoover, Director, Federal Bureau of Investigation, Washington, D.C.

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1. What is the purpose of the document?  
 2. What are the main findings of the study?  
 3. What are the implications of the findings?  
 4. What are the limitations of the study?  
 5. What are the conclusions of the study?

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property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 2517 Linden Avenue dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1988 - 1994.

4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant

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and each part has its own special characteristics

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and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.



h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property



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1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the study. The investigator must first identify the problem and then determine the scope of the study. The next step is to design the study. This involves determining the research objectives, the research questions, and the research hypotheses. The investigator must also determine the appropriate research methods and the data collection techniques. The third step is to collect the data. This involves the use of various data collection techniques such as interviews, surveys, and observations. The fourth step is to analyze the data. This involves the use of statistical methods to analyze the data and to draw conclusions from the results. The final step is to report the findings. This involves the preparation of a report that summarizes the findings of the study and provides recommendations for future research.

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1. The first part of the document is a list of names and their corresponding dates. The names are listed in the first column, and the dates are listed in the second column. The names are: [Name 1], [Name 2], [Name 3], [Name 4], [Name 5], [Name 6], [Name 7], [Name 8], [Name 9], [Name 10], [Name 11], [Name 12], [Name 13], [Name 14], [Name 15], [Name 16], [Name 17], [Name 18], [Name 19], [Name 20], [Name 21], [Name 22], [Name 23], [Name 24], [Name 25], [Name 26], [Name 27], [Name 28], [Name 29], [Name 30], [Name 31], [Name 32], [Name 33], [Name 34], [Name 35], [Name 36], [Name 37], [Name 38], [Name 39], [Name 40], [Name 41], [Name 42], [Name 43], [Name 44], [Name 45], [Name 46], [Name 47], [Name 48], [Name 49], [Name 50]. The dates are: [Date 1], [Date 2], [Date 3], [Date 4], [Date 5], [Date 6], [Date 7], [Date 8], [Date 9], [Date 10], [Date 11], [Date 12], [Date 13], [Date 14], [Date 15], [Date 16], [Date 17], [Date 18], [Date 19], [Date 20], [Date 21], [Date 22], [Date 23], [Date 24], [Date 25], [Date 26], [Date 27], [Date 28], [Date 29], [Date 30], [Date 31], [Date 32], [Date 33], [Date 34], [Date 35], [Date 36], [Date 37], [Date 38], [Date 39], [Date 40], [Date 41], [Date 42], [Date 43], [Date 44], [Date 45], [Date 46], [Date 47], [Date 48], [Date 49], [Date 50].

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DATE	DESCRIPTION	AMOUNT	CHECK NO.	BANK	INITIALS
10/1/78	DEPOSIT	100.00		CHASE	
10/2/78	PAYROLL	50.00	101	CHASE	
10/3/78	RENT	25.00	102	CHASE	
10/4/78	UTILITIES	15.00	103	CHASE	
10/5/78	SALES	75.00	104	CHASE	
10/6/78	DEPOSIT	120.00		CHASE	
10/7/78	PAYROLL	55.00	105	CHASE	
10/8/78	RENT	28.00	106	CHASE	
10/9/78	UTILITIES	18.00	107	CHASE	
10/10/78	SALES	80.00	108	CHASE	
10/11/78	DEPOSIT	130.00		CHASE	
10/12/78	PAYROLL	60.00	109	CHASE	
10/13/78	RENT	30.00	110	CHASE	
10/14/78	UTILITIES	20.00	111	CHASE	
10/15/78	SALES	85.00	112	CHASE	
10/16/78	DEPOSIT	140.00		CHASE	
10/17/78	PAYROLL	65.00	113	CHASE	
10/18/78	RENT	32.00	114	CHASE	
10/19/78	UTILITIES	22.00	115	CHASE	
10/20/78	SALES	90.00	116	CHASE	
10/21/78	DEPOSIT	150.00		CHASE	
10/22/78	PAYROLL	70.00	117	CHASE	
10/23/78	RENT	35.00	118	CHASE	
10/24/78	UTILITIES	25.00	119	CHASE	
10/25/78	SALES	95.00	120	CHASE	
10/26/78	DEPOSIT	160.00		CHASE	
10/27/78	PAYROLL	75.00	121	CHASE	
10/28/78	RENT	38.00	122	CHASE	
10/29/78	UTILITIES	28.00	123	CHASE	
10/30/78	SALES	100.00	124	CHASE	
10/31/78	DEPOSIT	170.00		CHASE	
11/1/78	PAYROLL	80.00	125	CHASE	
11/2/78	RENT	40.00	126	CHASE	
11/3/78	UTILITIES	30.00	127	CHASE	
11/4/78	SALES	105.00	128	CHASE	
11/5/78	DEPOSIT	180.00		CHASE	
11/6/78	PAYROLL	85.00	129	CHASE	
11/7/78	RENT	42.00	130	CHASE	
11/8/78	UTILITIES	32.00	131	CHASE	
11/9/78	SALES	110.00	132	CHASE	
11/10/78	DEPOSIT	190.00		CHASE	
11/11/78	PAYROLL	90.00	133	CHASE	
11/12/78	RENT	45.00	134	CHASE	
11/13/78	UTILITIES	35.00	135	CHASE	
11/14/78	SALES	115.00	136	CHASE	
11/15/78	DEPOSIT	200.00		CHASE	
11/16/78	PAYROLL	95.00	137	CHASE	
11/17/78	RENT	48.00	138	CHASE	
11/18/78	UTILITIES	38.00	139	CHASE	
11/19/78	SALES	120.00	140	CHASE	
11/20/78	DEPOSIT	210.00		CHASE	
11/21/78	PAYROLL	100.00	141	CHASE	
11/22/78	RENT	50.00	142	CHASE	
11/23/78	UTILITIES	40.00	143	CHASE	
11/24/78	SALES	125.00	144	CHASE	
11/25/78	DEPOSIT	220.00		CHASE	
11/26/78	PAYROLL	105.00	145	CHASE	
11/27/78	RENT	52.00	146	CHASE	
11/28/78	UTILITIES	42.00	147	CHASE	
11/29/78	SALES	130.00	148	CHASE	
11/30/78	DEPOSIT	230.00		CHASE	
12/1/78	PAYROLL	110.00	149	CHASE	
12/2/78	RENT	55.00	150	CHASE	
12/3/78	UTILITIES	45.00	151	CHASE	
12/4/78	SALES	135.00	152	CHASE	
12/5/78	DEPOSIT	240.00		CHASE	
12/6/78	PAYROLL	115.00	153	CHASE	

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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.
9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.



10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

[illegible]

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the situation.

2. Once the problem is identified, the next step is to define the objectives and goals of the project. This helps to clarify what needs to be achieved and provides a clear direction for the team.

3. The third step is to develop a plan or strategy to address the problem. This involves breaking down the problem into smaller, manageable tasks and determining the resources needed to complete them.

4. The fourth step is to implement the plan. This involves putting the strategy into action and monitoring progress to ensure that the project is on track.

5. The final step is to evaluate the results of the project. This involves assessing the outcomes against the objectives and goals to determine the effectiveness of the intervention.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### TWELFTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, Linden-Lakeview Properties, Inc., by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendant therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### THIRTEENTH COUNT

The above is a true and correct copy of the original as the same was presented to the undersigned by the person or persons claiming to be the owner or owners of the same.

1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a formal address, and it begins with the words "I have the honor to acknowledge the receipt of your letter of the 28th inst."

1. The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, regarding the land owned by the United States in the State of Nevada:

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466
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DATE	DESCRIPTION	AMOUNT	BALANCE
1960-01-01	Balance		100.00
1960-01-15	Deposit	50.00	150.00
1960-02-01	Withdrawal	25.00	125.00
1960-02-15	Deposit	75.00	200.00
1960-03-01	Withdrawal	100.00	100.00
1960-03-15	Deposit	50.00	150.00
1960-04-01	Withdrawal	75.00	75.00
1960-04-15	Deposit	25.00	100.00
1960-05-01	Withdrawal	50.00	50.00
1960-05-15	Deposit	25.00	75.00
1960-06-01	Withdrawal	75.00	0.00
1960-06-15	Deposit	50.00	50.00
1960-07-01	Withdrawal	25.00	25.00
1960-07-15	Deposit	25.00	50.00
1960-08-01	Withdrawal	50.00	0.00
1960-08-15	Deposit	75.00	75.00
1960-09-01	Withdrawal	25.00	50.00
1960-09-15	Deposit	25.00	75.00
1960-10-01	Withdrawal	75.00	0.00
1960-10-15	Deposit	50.00	50.00
1960-11-01	Withdrawal	25.00	25.00
1960-11-15	Deposit	25.00	50.00
1960-12-01	Withdrawal	50.00	0.00
1960-12-15	Deposit	75.00	75.00
1961-01-01	Balance		75.00

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1. For that all of the time mentioned herein the Defendant, Max Slaybough, Individually and as President of Linden-Lakeview Properties, Inc., owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 2517 Linden Avenue, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 2517 Linden Avenue dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1988 - 1994.

4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

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5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his

[illegible]

agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

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7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

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Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

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11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

1. The first step in the process of creating a new product is to identify a market need. This involves conducting market research to understand the preferences and behaviors of potential customers.

2. Once a market need is identified, the next step is to develop a concept. This involves brainstorming ideas and creating a prototype to visualize the product.

3. The third step is to conduct a feasibility study. This involves evaluating the technical, financial, and operational aspects of the product to determine if it is viable.

4. After the feasibility study, the next step is to develop a business plan. This involves outlining the marketing, sales, and financial strategies for the product.

5. The final step is to launch the product. This involves manufacturing the product, distributing it to retailers, and promoting it to the target market.

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13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### FOURTEENTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, Max Slaybough, Individually and as President of Linden-Lakeview Properties, Inc., by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the

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dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendant therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### FIFTEENTH COUNT

1. For that all of the time mentioned herein the Decedent of the Defendant, The Estate of Max Slaybough, owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 2517 Linden Avenue, in the City of Baltimore, State of Maryland which the Decedent either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Decedent, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Decedent at the 2517 Linden Avenue dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born

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December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1988 - 1994.

4. Both before and after the time the Plaintiff moved into the dwelling, the Decedent had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Decedent in applying lead based paint in the dwelling.

b) The negligence of the Decedent and/or the Decedent's agents in failing to warn the Plaintiffs of the lead hazard which the Decedent and/or the Decedent's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Decedent in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

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8. The eighth part deals with the future prospects.

9. The ninth part deals with the conclusion.

10. The tenth part deals with the appendix.

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d) The negligence of the Decedent and/or the Decedent's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Decedent in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Decedent or his agents knew or had reason to know that the paint was lead based paint and the Decedent or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Decedent and/or the Decedent's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Decedent and/or the Decedent's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Decedent in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Decedent and/or the Decedent's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which

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foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Decedent and/or the Decedent's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Decedent or the agent, servant or employee of the Decedent who managed the property for the Decedent was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Decedent was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the

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1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

2. The second step is to gather relevant information and data. This can be done through research, consultation with experts, or by analyzing existing data sets.

3. The third step is to develop a plan or strategy to address the problem. This involves breaking down the problem into smaller, manageable parts and determining the best approach to solve each part.

4. The fourth step is to implement the plan. This involves carrying out the tasks and activities that have been identified in the plan.

5. The fifth step is to evaluate the results. This involves comparing the actual outcomes with the expected outcomes and identifying any areas for improvement.

6. The sixth step is to communicate the findings. This involves sharing the results of the analysis with the relevant stakeholders and providing recommendations for action.

7. The seventh step is to monitor and review the process. This involves keeping track of the progress of the project and making adjustments as needed to ensure that the project is completed successfully.

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1. Name of the person	2. Date of birth	3. Place of birth	4. Nationality	5. Sex	6. Religion	7. Marital status	8. Education	9. Occupation	10. Address	11. Contact details	12. Remarks

1. The first step in the process of identifying a problem is to define the problem clearly. This involves identifying the symptoms, the scope of the problem, and the impact it is having on the organization. Once the problem is defined, the next step is to gather information about the problem. This can be done through interviews, surveys, and other research methods. The information gathered should be used to identify the causes of the problem and to develop a plan to address the problem. The final step in the process is to implement the plan and to monitor the results. This involves setting up a system of controls to ensure that the plan is being followed and to measure the progress of the problem-solving process. Once the problem has been solved, the system of controls should be reviewed and updated as needed to prevent the problem from recurring.

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sources of knowledge listed above in the preceding paragraph. Or the Decedent's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Decedent and/or workmen/agents of the Decedent visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Decedent and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Decedent was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused

permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a



direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Decedent.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### SIXTEENTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Decedent, The Estate of Max Slaybough, by marketing, and otherwise making available to the public for lease, the dwelling described herein

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impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Decedent and/or the Decedent's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Decedent therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Decedent's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### SEVENTEENTH COUNT

1. For that all of the time mentioned herein the Defendant, Lawrence M. Polakoff, owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 1906 E. Federal Street, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said

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property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 1906 E. Federal Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1994 - 1995.

4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant

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and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property



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1. 1947-1948	1947-1948	1947-1948	1947-1948	1947-1948
2. 1949-1950	1949-1950	1949-1950	1949-1950	1949-1950
3. 1951-1952	1951-1952	1951-1952	1951-1952	1951-1952
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7. 1959-1960	1959-1960	1959-1960	1959-1960	1959-1960
8. 1961-1962	1961-1962	1961-1962	1961-1962	1961-1962
9. 1963-1964	1963-1964	1963-1964	1963-1964	1963-1964
10. 1965-1966	1965-1966	1965-1966	1965-1966	1965-1966
11. 1967-1968	1967-1968	1967-1968	1967-1968	1967-1968
12. 1969-1970	1969-1970	1969-1970	1969-1970	1969-1970
13. 1971-1972	1971-1972	1971-1972	1971-1972	1971-1972
14. 1973-1974	1973-1974	1973-1974	1973-1974	1973-1974
15. 1975-1976	1975-1976	1975-1976	1975-1976	1975-1976
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17. 1979-1980	1979-1980	1979-1980	1979-1980	1979-1980
18. 1981-1982	1981-1982	1981-1982	1981-1982	1981-1982
19. 1983-1984	1983-1984	1983-1984	1983-1984	1983-1984
20. 1985-1986	1985-1986	1985-1986	1985-1986	1985-1986
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23. 1991-1992	1991-1992	1991-1992	1991-1992	1991-1992
24. 1993-1994	1993-1994	1993-1994	1993-1994	1993-1994
25. 1995-1996	1995-1996	1995-1996	1995-1996	1995-1996
26. 1997-1998	1997-1998	1997-1998	1997-1998	1997-1998
27. 1999-2000	1999-2000	1999-2000	1999-2000	1999-2000
28. 2001-2002	2001-2002	2001-2002	2001-2002	2001-2002
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30. 2005-2006	2005-2006	2005-2006	2005-2006	2005-2006
31. 2007-2008	2007-2008	2007-2008	2007-2008	2007-2008
32. 2009-2010	2009-2010	2009-2010	2009-2010	2009-2010
33. 2011-2012	2011-2012	2011-2012	2011-2012	2011-2012
34. 2013-2014	2013-2014	2013-2014	2013-2014	2013-2014
35. 2015-2016	2015-2016	2015-2016	2015-2016	2015-2016
36. 2017-2018	2017-2018	2017-2018	2017-2018	2017-2018
37. 2019-2020	2019-2020	2019-2020	2019-2020	2019-2020
38. 2021-2022	2021-2022	2021-2022	2021-2022	2021-2022
39. 2023-2024	2023-2024	2023-2024	2023-2024	2023-2024
40. 2025-2026	2025-2026	2025-2026	2025-2026	2025-2026
41. 2027-2028	2027-2028	2027-2028	2027-2028	2027-2028
42. 2029-2030	2029-2030	2029-2030	2029-2030	2029-2030
43. 2031-2032	2031-2032	2031-2032	2031-2032	2031-2032
44. 2033-2034	2033-2034	2033-2034	2033-2034	2033-2034
45. 2035-2036	2035-2036	2035-2036	2035-2036	2035-2036
46. 2037-2038	2037-2038	2037-2038	2037-2038	2037-2038
47. 2039-2040	2039-2040	2039-2040	2039-2040	2039-2040
48. 2041-2042	2041-2042	2041-2042	204	

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81. 2020			

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owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

[illegible]

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

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12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### EIGHTEENTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

The first of these is the fact that the
 government has been unable to
 control the price of oil. This
 has led to a sharp increase in
 the cost of oil, which has in
 turn led to a sharp increase in
 the cost of gasoline. This has
 led to a sharp increase in the
 cost of transportation, which
 has led to a sharp increase in
 the cost of goods and services.
 This has led to a sharp increase
 in the cost of living, which has
 led to a sharp increase in the
 cost of doing business. This has
 led to a sharp increase in the
 cost of production, which has
 led to a sharp increase in the
 cost of distribution. This has
 led to a sharp increase in the
 cost of consumption, which has
 led to a sharp increase in the
 cost of the economy. This has
 led to a sharp increase in the
 cost of the nation. This has
 led to a sharp increase in the
 cost of the world. This has
 led to a sharp increase in the
 cost of the universe. This has
 led to a sharp increase in the
 cost of everything.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, Lawrence M. Polakoff, by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendant therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### NINETEENTH COUNT



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1. For that all of the time mentioned herein the Defendant, CFOD-2 Limited Partnership, owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 1906 E. Federal Street, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 1906 E. Federal Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1994 - 1995.

4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the study. The investigator must first identify the problem and then determine the scope of the study. The next step is to design the study. This involves determining the methods to be used and the data to be collected. The third step is to collect the data. This is done by the investigator who is responsible for the study. The fourth step is to analyze the data. This involves determining the results of the study and the conclusions that can be drawn from the data. The final step is to report the results of the study. This is done by the investigator who is responsible for the study.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his

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agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

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7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.



1. The first step in the process of the scientific method is to make an observation or ask a question. For example, you might notice that plants in a sunny location grow faster than plants in a shady location. This leads to the question: "Does the amount of sunlight affect the growth rate of plants?"

2. Next, you formulate a hypothesis, which is a tentative answer to your question. In this case, you might hypothesize: "If a plant receives more sunlight, then it will grow faster."

3. The third step is to design an experiment to test your hypothesis. This involves identifying the variables you will manipulate and measure. In our example, the independent variable is the amount of sunlight (which you would control by placing plants in different locations), and the dependent variable is the growth rate (which you would measure by the height of the plants over time).

4. You then conduct the experiment, carefully controlling for other factors that might affect plant growth, such as water and soil quality. You would grow two groups of identical plants: one in full sunlight and one in shade.

5. After collecting data on the growth of the plants over a set period, you analyze the results. You might find that the plants in the sunlight grew significantly taller than the plants in the shade.

6. Finally, you draw a conclusion based on your analysis. If the data supports your hypothesis, you conclude that increased sunlight leads to faster plant growth. If the data does not support your hypothesis, you might revise your hypothesis and repeat the experiment.

Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

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11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

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13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### TWENTIETH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, CFOD-2 Limited Partnership, by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

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6. The Defendant therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### TWENTY FIRST COUNT

1. For that all of the time mentioned herein the Defendant, Chase Management, Inc., owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 1906 E. Federal Street, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 1906 E. Federal Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1994 - 1995.



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4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or

The following information was obtained from the records of the  
 Department of the Interior, Bureau of Land Management, at  
 Washington, D. C., on the subject of the land owned by the  
 United States in the State of California, and the same is  
 being furnished to you for your information.

1. The first part of the document is a letter from the President of the United States to the President of the Senate, dated January 1, 1877. The letter is signed by Rutherford B. Hayes and is addressed to Charles Schreyer. The letter is a copy of a letter that was sent to the President of the Senate by the President of the United States.

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1. The first part of the document is a letter from the President of the United States to the Congress, dated January 1, 1861. It is a copy of the original letter, and is signed by Abraham Lincoln.

1. The first step is to identify the problem. This involves understanding the situation and the goals that need to be achieved.

2. The second step is to gather information. This involves collecting data and resources that will be needed to solve the problem.

3. The third step is to develop a plan. This involves creating a strategy and a timeline for solving the problem.

4. The fourth step is to implement the plan. This involves putting the strategy into action and monitoring progress.

5. The fifth step is to evaluate the results. This involves assessing the effectiveness of the solution and making adjustments as needed.

illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or

[illegible]

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the situation.

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inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the

[illegible]

Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body,



1. The first part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".

2. The second part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".

3. The third part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".

4. The fourth part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".

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9. The ninth part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".

10. The tenth part of the document is a list of names and titles, including "The Hon. Mr. Justice" and "The Hon. Mr. Justice".

The first of these is the fact that the
 government has been unable to raise
 sufficient funds to meet its
 obligations. This is due to a
 combination of factors, including
 a decline in tax revenue and an
 increase in government spending.
 The second factor is the
 government's failure to
 implement effective
 economic policies. This has
 led to a loss of confidence
 in the government and a
 consequent decline in
 investment and
 economic growth.
 The third factor is the
 government's
 failure to
 maintain
 a
 stable
 political
 environment. This
 has led to
 a
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 confidence
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 consequent
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is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### TWENTY SECOND COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, Chase Management, Inc., by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland



and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendant therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### TWENTY THIRD COUNT

1. For that all of the time mentioned herein the Defendant, CFSP Limited Partnership, owned and/or controlled and/or managed, either individually or by the use of agents, servants and/or employees, a lot of ground known as 1906 E. Federal Street, in the City of Baltimore, State of Maryland which the Defendant either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

2. It is alleged alternatively that the Defendant, if sued in the capacity of a present or former corporate officer of a corporation which owned the said property, did personally participate in, inspire and/or induce the tortious acts or omissions complained of herein.

The following is a list of the names of the persons who have been  
 named in the above mentioned affidavits, together with the names of the  
 persons who have been named in the affidavits of the persons named  
 in the above mentioned affidavits, and the names of the persons who  
 have been named in the affidavits of the persons named in the above  
 mentioned affidavits, and the names of the persons who have been  
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 affidavits, and the names of the persons who have been named in the  
 affidavits of the persons named in the above mentioned affidavits,

[illegible]

Q. Now, I understand that the word "intention" means to do something with a purpose, is that correct?

A. Yes, that's correct.

Q. And, I understand that the word "purpose" means to do something with a goal in mind, is that correct?

A. Yes, that's correct.

Q. Now, I understand that the word "intent" means to do something with a purpose and a goal in mind, is that correct?

A. Yes, that's correct.

Q. Now, I understand that the word "intent" means to do something with a purpose and a goal in mind, is that correct?

A. Yes, that's correct.

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3. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendant at the 1906 E. Federal Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10, 1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1994 - 1995.

4. Both before and after the time the Plaintiff moved into the dwelling, the Defendant had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

5. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

6. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendant in applying lead based paint in the dwelling.

b) The negligence of the Defendant and/or the Defendant's agents in failing to warn the Plaintiffs of the lead hazard which the Defendant and/or the Defendant's agents knew or should have known or had reason to know existed in the premises.

[illegible][illegible]

1. Name of the person	2. Date of birth	3. Place of birth	4. Nationality
5. Occupation	6. Education	7. Marital status	8. Address
9. Telephone number	10. E-mail address	11. Social media handles	12. Other relevant information

DATE	DESCRIPTION	AMOUNT	CHECK NO.	BANK	INITIALS
10/1/78	DEPOSIT	100.00		CHASE	
10/2/78	PAYROLL	50.00	101	CHASE	
10/3/78	RENT	25.00	102	CHASE	
10/4/78	UTILITIES	15.00	103	CHASE	
10/5/78	SALES	75.00	104	CHASE	
10/6/78	DEPOSIT	120.00		CHASE	
10/7/78	PAYROLL	55.00	105	CHASE	
10/8/78	RENT	28.00	106	CHASE	
10/9/78	UTILITIES	18.00	107	CHASE	
10/10/78	SALES	80.00	108	CHASE	
10/11/78	DEPOSIT	130.00		CHASE	
10/12/78	PAYROLL	60.00	109	CHASE	
10/13/78	RENT	30.00	110	CHASE	
10/14/78	UTILITIES	20.00	111	CHASE	
10/15/78	SALES	85.00	112	CHASE	
10/16/78	DEPOSIT	140.00		CHASE	
10/17/78	PAYROLL	65.00	113	CHASE	
10/18/78	RENT	32.00	114	CHASE	
10/19/78	UTILITIES	22.00	115	CHASE	
10/20/78	SALES	90.00	116	CHASE	
10/21/78	DEPOSIT	150.00		CHASE	
10/22/78	PAYROLL	70.00	117	CHASE	
10/23/78	RENT	35.00	118	CHASE	
10/24/78	UTILITIES	25.00	119	CHASE	
10/25/78	SALES	95.00	120	CHASE	
10/26/78	DEPOSIT	160.00		CHASE	
10/27/78	PAYROLL	75.00	121	CHASE	
10/28/78	RENT	38.00	122	CHASE	
10/29/78	UTILITIES	28.00	123	CHASE	
10/30/78	SALES	100.00	124	CHASE	
10/31/78	DEPOSIT	170.00		CHASE	
11/1/78	PAYROLL	80.00	125	CHASE	
11/2/78	RENT	40.00	126	CHASE	
11/3/78	UTILITIES	30.00	127	CHASE	
11/4/78	SALES	105.00	128	CHASE	
11/5/78	DEPOSIT	180.00		CHASE	
11/6/78	PAYROLL	85.00	129	CHASE	
11/7/78	RENT	42.00	130	CHASE	
11/8/78	UTILITIES	32.00	131	CHASE	
11/9/78	SALES	110.00	132	CHASE	
11/10/78	DEPOSIT	190.00		CHASE	
11/11/78	PAYROLL	90.00	133	CHASE	
11/12/78	RENT	45.00	134	CHASE	
11/13/78	UTILITIES	35.00	135	CHASE	
11/14/78	SALES	115.00	136	CHASE	
11/15/78	DEPOSIT	200.00		CHASE	
11/16/78	PAYROLL	95.00	137	CHASE	
11/17/78	RENT	48.00	138	CHASE	
11/18/78	UTILITIES	38.00	139	CHASE	
11/19/78	SALES	120.00	140	CHASE	
11/20/78	DEPOSIT	210.00		CHASE	
11/21/78	PAYROLL	100.00	141	CHASE	
11/22/78	RENT	50.00	142	CHASE	
11/23/78	UTILITIES	40.00	143	CHASE	
11/24/78	SALES	125.00	144	CHASE	
11/25/78	DEPOSIT	220.00		CHASE	
11/26/78	PAYROLL	105.00	145	CHASE	
11/27/78	RENT	52.00	146	CHASE	
11/28/78	UTILITIES	42.00	147	CHASE	
11/29/78	SALES	130.00	148	CHASE	
11/30/78	DEPOSIT	230.00		CHASE	
12/1/78	PAYROLL	110.00	149	CHASE	
12/2/78	RENT	55.00	150	CHASE	
12/3/78	UTILITIES	45.00	151	CHASE	
12/4/78	SALES	135.00	152	CHASE	
12/5/78	DEPOSIT	240.00		CHASE	
12/6/78	PAYROLL	115.00	153	CHASE	

[illegible]



c) The negligence of the Defendant in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

d) The negligence of the Defendant and/or the Defendant's agents in undertaking to paint the premises prior to and/or during the child's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

e) The negligence of the Defendant in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendant or his agents knew or had reason to know that the paint was lead based paint and the Defendant or his agents had a reasonable opportunity to perform these repairs.

f) The negligence of the Defendant and/or the Defendant's agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendant and/or the Defendant's agents had been advised or was aware or should have been aware either personally or through agents.

g) The negligence of the Defendant in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

h) The negligence of the Defendant and/or the Defendant's agents in performing the lead abatement in such a fashion as to increase, rather

1. The first part of the report is a general introduction to the subject.

2. The second part is a detailed description of the methods used in the study.

3. The third part is a discussion of the results of the study.

4. The fourth part is a conclusion and a list of references.

5. The fifth part is a summary of the main findings of the study.

6. The sixth part is a list of the names of the authors and their institutions.

7. The seventh part is a list of the titles of the papers presented at the conference.

8. The eighth part is a list of the names of the speakers and their topics.

9. The ninth part is a list of the names of the organizers and their roles.

than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

i) The Defendant and/or the Defendant's agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendant failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

7. At all times mentioned herein the Defendant or the agent, servant or employee of the Defendant who managed the property for the Defendant was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance

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1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

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industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Defendant and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

8. And the Defendant was otherwise negligent.

9. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

10. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the

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property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

11. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

12. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain

1. The first step in the process of creating a new product is to identify a market need. This involves conducting market research to understand the preferences and behaviors of potential customers.

2. Once a market need is identified, the next step is to develop a concept. This involves brainstorming ideas and creating a prototype that demonstrates the basic functionality of the product.

3. The third step is to conduct a feasibility study. This involves evaluating the technical, financial, and operational aspects of the product to determine if it is viable for production.

4. If the feasibility study is successful, the next step is to develop a business plan. This involves outlining the marketing, sales, and distribution strategies for the product.

5. The final step is to launch the product. This involves manufacturing the product, distributing it to retailers, and promoting it to the target market.

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1. The first part of the document is a letter from the President of the United States to the President of the Senate, dated January 1, 1901. The letter is signed by William McKinley and is addressed to John Sherman. The letter is a copy of a letter that was sent to the President of the Senate by the President of the United States.



development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

13. The Plaintiff was otherwise injured and damaged.

14. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendant.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims Five Million Dollars damages.

#### TWENTY FOURTH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

[illegible]

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

4. The Defendant, CFSP Limited Partnership, by marketing, and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendant and/or the Defendant's agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendant therefore violated the Consumer Protection Act.

7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendant's violations of the act.

Wherefore the Plaintiff claims Five Million Dollars Damages.

#### TWENTY FIFTH COUNT

1. In 1992 Kennedy-Krieger Institute, Inc. ("Kennedy") with the collaboration of the Johns Hopkins University School of Public Health commenced a research study funded and sponsored by the U.S. Environmental Protection

[illegible]

Agency's Office of Pollution Prevention and Toxics ("EPA") and the Maryland Department of Housing and Community Development known as the Lead-Based Paint Abatement and Repair and Maintenance Study ("the study"). The Baltimore City Health Department and Maryland Department of the Environment also collaborated in the study. The study was approved by the Joint Committee on Clinical Investigation of the Johns Hopkins University School of Medicine and the Johns Hopkins Hospital. ("JCCI"). Thomas R. Hendrix, M.D. was chairman of the JCCI and approved the study under an expedited review procedure.

2. Agents, servants and employees of Defendants Kennedy, Johns Hopkins Hospital, Johns Hopkins University School of Medicine and Johns Hopkins University School of Public Health all participated in the design, approval and implementation of the Study.

3. In 1993, the EPA awarded Contract 68-D4-001, entitled "Evaluation of Efficacy of Residential Lead Based Paint and Repair and Maintenance Interventions" to Kennedy. Kennedy was to receive \$200,000 for performing its responsibilities under the contract.

4. The purpose of this research study was to characterize and compare the short and long term efficacy of comprehensive lead paint abatement and less costly and potentially more cost-effective Repair and Maintenance interventions for reducing levels of lead in residential house dust which in turn should reduce lead in children's blood.

5. The study was specifically designed to do less than full lead paint abatement in order to study any potential long term effectiveness of lesser levels of

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repair, factored in terms of reducing lead exposure in house dust and children's blood lead levels. The ultimate aim of the research was to find a less than complete level of abatement that would be relatively safe, but economical, so that Baltimore landlords with lower socio-economical rental units would not abandon the units.

6. To implement the study, Kennedy recruited landlords owning properties in Baltimore City through the Property Owners Association.

7. In 1993 Lawrence Polakoff was one of the landlords who Kennedy solicited, and he volunteered his property 1906 E. Federal Street to be a part of the Study.

8. Kennedy required that for any property to qualify for the Study, including 1906 E. Federal Street, it must have been built before 1941, have documented lead-based paint in the unit and have elevated levels of lead in dust in at least two sites in the house greater than the clearance criteria standard in Maryland.

9. In December of 1993 Kennedy had 1906 E. Federal Street tested by an outside contractor. The house tested positive for lead in paint dust throughout the house. Kennedy then determined that the house qualified for the Study.

10. Once a property qualified for the Study, Kennedy randomly divided the properties into three groups. Each group of properties was to undergo a different type of repair and maintenance intervention. Group One received the lowest level of repair. This level of intervention had a cost cap of \$1650. Group Two was given a slightly higher level of repair. This level of intervention had a cost

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cap of \$3500. Group Three was given the highest level of repair. This level of intervention had a cost cap of \$6000-\$7000. In addition to the repair and maintenance of these three groups, the study also included two other groups. These two additional groups included homes identified as having been previously abated of lead paint and modern urban dwellings constructed after 1980. Neither of these two groups was to receive any repair and maintenance and each was to serve as a control group.

11. 1906 E. Federal Street was randomly assigned a level two intervention. The intervention included replacing the entryway mat, reducing friction in the window sashes against the window jams, floors were made smooth and cleanable with some type of covering, re-hanging of doors to avoid scraping of the door and the door jamb, removal of loose and peeling paint to the limit of the funding budget and HEPA vacuuming to remove particles from the air. This treatment was not a full abatement of lead, and was limited in scope due to the funding limit of \$3500 from the Maryland Department of the Environment.

12. Kennedy's staff developed the plan for the specific repairs to the house and obtained agreement with the property owner and contractor with regard to the limited nature of these repairs.

13. Kennedy approved the Contractor Environmental Restorations, Inc. to perform the repairs developed by Kennedy. Kennedy performed a walk-through inspection of the property 1906 E. Federal Street at the inception of the Study and informed Lawrence Polakoff and Environmental Restorations, Inc. as to what needed to be done to conform to a level two intervention.

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14. The cost of repairs was paid for by special loan funds made available by the Maryland Department of Housing and Community Development. Lawrence Polakoff applied for the \$3500 loan fund and he personally did not expend any money for the repairs.

15. All repairs were completed to 1906 E. Federal Street in approximately April of 1994. Once repairs were completed Kennedy performed immediate post intervention samples of the dust. On May 17, 1994 Kennedy obtained this first post intervention dust sample.

A composite sample of dust from the first level floor was 533 micrograms per square foot that was above the Maryland clearance level of 200 micrograms per square foot. A composite sample of a first level windowsill was 2274 micrograms per square foot that was above Maryland clearance level of 500 micrograms per square foot. A composite sample of the interior entrance was 1530 micrograms per square foot that was also above the Maryland clearance level.

16. Pursuant to the Study protocol, once repairs were completed Lawrence Polakoff was required to lease the property to a family with at least one young child in order for Kennedy to evaluate the effects of the partial repairs on the child's health. Kennedy only wanted children to participate who did not have any type of mental retardation or severe handicap that would limit their physical movement. Kennedy did not want participating subjects to move from the home because Kennedy was interested in following the family over a period of years. Once the family moved into the home Kennedy sought to periodically test the lead

1940-1941	1941-1942	1942-1943	1943-1944	1944-1945	1945-1946	1946-1947	1947-1948	1948-1949	1949-1950	1950-1951	1951-1952	1952-1953	1953-1954	1954-1955	1955-1956	1956-1957	1957-1958	1958-1959	1959-1960	1960-1961	1961-1962	1962-1963	1963-1964	1964-1965	1965-1966	1966-1967	1967-1968	1968-1969	1969-1970	1970-1971	1971-1972	1972-1973	1973-1974	1974-1975	1975-1976	1976-1977	1977-1978	1978-1979	1979-1980	1980-1981	1981-1982	1982-1983	1983-1984	1984-1985	1985-1986	1986-1987	1987-1988	1988-1989	1989-1990	1990-1991	1991-1992	1992-1993	1993-1994	1994-1995	1995-1996	1996-1997	1997-1998	1998-1999	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	2030-2031	2031-2032	2032-2033	2033-2034	2034-2035	2035-2036	2036-2037	2037-2038	2038-2039	2039-2040	2040-2041	2041-2042	2042-2043	2043-2044	2044-2045	2045-2046	2046-2047	2047-2048	2048-2049	2049-2050	2050-2051	2051-2052	2052-2053	2053-2054	2054-2055	2055-2056	2056-2057	2057-2058	2058-2059	2059-2060	2060-2061	2061-2062	2062-2063	2063-2064	2064-2065	2065-2066	2066-2067	2067-2068	2068-2069	2069-2070	2070-2071	2071-2072	2072-2073	2073-2074	2074-2075	2075-2076	2076-2077	2077-2078	2078-2079	2079-2080	2080-2081	2081-2082	2082-2083	2083-2084	2084-2085	2085-2086	2086-2087	2087-2088	2088-2089	2089-2090	2090-2091	2091-2092	2092-2093	2093-2094	2094-2095	2095-2096	2096-2097	2097-2098	2098-2099	2099-2100	2100-2101	2101-2102	2102-2103	2103-2104	2104-2105	2105-2106	2106-2107	2107-2108	2108-2109	2109-2110	2110-2111	2111-2112	2112-2113	2113-2114	2114-2115	2115-2116	2116-2117	2117-2118	2118-2119	2119-2120	2120-2121	2121-2122	2122-2123	2123-2124	2124-2125	2125-2126	2126-2127	2127-2128	2128-2129	2129-2130	2130-2131	2131-2132	2132-2133	2133-2134	2134-2135	2135-2136	2136-2137	2137-2138	2138-2139	2139-2140	2140-2141	2141-2142	2142-2143	2143-2144	2144-2145	2145-2146	2146-2147	2147-2148	2148-2149	2149-2150	2150-2151	2151-2152	2152-2153	2153-2154	2154-2155	2155-2156	2156-2157	2157-2158	2158-2159	2159-2160	2160-2161	2161-2162	2162-2163	2163-2164	2164-2165	2165-2166	2166-2167	2167-2168	2168-2169	2169-2170	2170-2171	2171-2172	2172-2173	2173-2174	2174-2175	2175-2176	2176-2177	2177-2178	2178-2179	2179-2180	2180-2181	2181-2182	2182-2183	2183-2184	2184-2185	2185-2186	2186-2187	2187-2188	2188-2189	2189-2190	2190-2191	2191-2192	2192-2193	2193-2194	2194-2195	2195-2196	2196-2197	2197-2198	2198-2199	2199-2200	2200-2201	2201-2202	2202-2203	2203-2204	2204-2205	2205-2206	2206-2207	2207-2208	2208-2209	2209-2210	2210-2211	2211-2212	2212-
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in the dust and the lead level in the children's blood at close intervals to compare these levels.

17. During the Spring of 1994 Jacqueline Martin along with her friend Catina Higgins were looking for a home to reside with their several young children, including the Plaintiff, Ashley Partlow. She located the property 1906 E. Federal Street from an advertisement in the newspaper. The management company that rented the property to Ms. Martin and Ms. Higgins is Chase Realty. Chase Realty's principal is Lawrence Polakoff. Mr. Polakoff is a professional owner and operator of rental properties in Baltimore City who by 1994 had been in the rental business for many years and was active in the Property Owners Association. Chase Realty through its principal Lawrence Polakoff leased the property 1906 E. Federal Street to Ms. Martin and Ms. Higgins pursuant to requirements of the Study protocol as determined by Kennedy, Johns Hopkins Hospital, Johns Hopkins University School of Medicine and John Hopkins University School of Public Health.

18. Jacqueline Martin and Catina Higgins, along with their young children, including Ashley Partlow moved into 1906 E. Federal Street in May of 1994. At the time of moving into 1906 E. Federal Street Jacqueline Martin was unaware that the property ever contained lead-based paint. At the time of moving into 1906 E. Federal Street no one had ever informed Ms. Martin that this home was part of a research study.

19. Not until after the Martin and Higgins families moved into the property did agents, servants and employees of Kennedy approach the residents of 1906 E. Federal Street with Clinical Investigation Consent Forms (consent forms).

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Defendants enrolled Ms. Martin's younger daughter, Anquenette Partlow (DOB: 9/3/91) in the study as well as Ms. Higgins son Myron Higgins (DOB: 12/23/89) in the study through their mothers and guardians. Ms. Martin signed a consent form on her own behalf that allowed Defendants and their agents, servants and employees into the Study home to test the home and on behalf of her younger daughter Anquenette Partlow that allowed Defendants and their agents, servants and employees to test Anquenette Partlow's blood. To the best of Plaintiff's knowledge, information and belief, Kennedy did not obtain a signed consent form for Ashley Partlow, a minor child who resided in the Study home along with her mother and sister and who was also exposed to the toxic environment of the Study home.

20. Although the Consent Form states: "Lead poisoning in children is a problem in Baltimore City", the form never explained the specific dangers and risks associated with lead poisoning. It never listed the permanent injuries that children could be subject to by living in a home containing high levels of lead in paint and dust, including permanent cellular destruction and retardation of cellular development, permanent and severe brain damage, diminution in IQ, learning disabilities, extreme difficulty reading, shortened attention span, impulsivity, behavioral and hyperactivity disorder, visual and spatial motor control problems, diminution in stature, to name just a few.

21. The Consent form never stated that 1906 E. Federal Street contained lead-based paint and high levels of lead in dust. The form did not list the specific hazardous areas of the home that contained lead-based paint and leaded dust of

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which Kennedy, Johns Hopkins and their agents, servants and employees were aware from their extensive testing. Ms. Martin was not warned that by continually residing at this property it was foreseeable that her children may be exposed to lead-based paint and dust and they might develop lead poisoning. The Consent form never warned that by residing in the home her children might suffer any type of permanent and irreversible harm from exposure to the lead in the paint and dust.

22. The Consent form never stated the specific limited nature of the repairs to the home and that the Study's main purpose was to observe the effects of limited repair on children's health versus a more complete abatement of lead on children's health. The Informed Consent form failed to provide an adequate description of the different levels of repair and maintenance work to be done in the homes under the research protocol. Ms. Martin was never made aware that the other homes in the Study had received a much more extensive repair and some homes in the study were fully abated or modern dwellings without any lead. Ms. Martin was never made aware that children living in the home were being "studied" to observe whether they would receive a more harmful level of exposure to lead versus children residing in study homes with more extensive levels of lead abatement. Ms. Martin was never made aware that the limited nature of repairs made to her home was experimental in reducing a child's exposure to lead, and in fact no information existed as to whether these repairs would actually reduce exposure or in fact may increase lead in household dust. Ms. Martin was also never informed that an alternative and scientifically proven form of treatment to

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reduce children's lead exposure would be to remove them from the lead infested property and move into a fully abated or modern lead free home.

23. Kennedy and Johns Hopkins by their agents, servants and employees expressly promised in the Consent Form to, among other things, financially compensate the families for their participation in the Study; collect lead dust samples from the Study home; collect blood samples from children enrolled in the Study; analyze the samples; discuss the results with Ms. Martin, and discuss steps that could be taken which could reduce exposure to lead. Plaintiff Ashley Partlow as a minor child of Ms. Martin and a resident of the Study home was a third party beneficiary of this contractual obligation on the part of the Defendants.

24. While Defendants were aware that the home contained high levels of lead in paint from its XRF testing in December 1993, it never informed Ms. Martin or Ms. Higgins of this information.

25. Although prior to obtaining any Informed Consent Defendants were aware that they did not remove all the lead paint in the home and that the home still contained high levels of lead in dust above the clearance criteria in Maryland for abated homes, as evidenced by its post intervention testing on May 17, 1994, Defendants never informed Ms. Martin or Ms. Higgins of this pertinent information. To the contrary, letters Kennedy sent the families over one month after its dust testing, informing them of the results of the post intervention dust testing failed to warn Ms. Martin or Ms. Higgins or any areas containing lead dust and gave a misleading impression that the home did not contain any lead in the dust samples.

The following information is being provided for your information and is not to be used for any other purpose. The information is being provided for your information and is not to be used for any other purpose. The information is being provided for your information and is not to be used for any other purpose.

26. On July 25, 1994 Kennedy performed a second dust testing of the home and found many areas of the home to contain increases in lead dust from May 17, 1994. Kennedy did not send a warning letter to Ms. Martin or Ms. Higgins until four months after the family moved into the home on September 14, 1994. Nonetheless, only one area of the home was cited as containing lead dust. The letter failed to inform them of the other areas of the home containing lead dust as evidenced by Kennedy's testing, the significance of this increase in lead dust, the areas in the home of greatest exposure, nor did the letter inform them of the considerable health hazard to their young children from exposure to this increase in lead dust.

27. These significant new findings developed during the course of the research related to Ms. Martin's willingness to continue participation in the Study. At this point Defendants had an obligation to confirm the Informed Consent when serious findings came to light that likely effected her willingness to participate. Defendants failed to ever confirm the Informed Consent during its ongoing research.

28. Instead of getting adequate informed consent in a study with a known risk to human health and safety, Defendants gave the participants small incentives to participate. Families were given \$5.00 to allow testers into their home and \$15.00 every time they completed a questionnaire. The parents were informed that their home would be tested for free and their children enrolled in the Study would receive free blood-work. The children were given prizes, gifts, toys and clothing

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 2. development of the new system is the  
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 4. is done by the user and the system  
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 10. step is the testing of the system. This  
 11. is done by the user and the system  
 12. analyst. The fifth step is the  
 13. maintenance of the system. This is  
 14. done by the system analyst.

1. The first part of the document is a letter from the President of the United States to the President of the Senate, dated January 1, 1877. The letter is signed by Rutherford B. Hayes and is addressed to Charles Schreyer. The letter is a copy of a letter that was sent to the President of the Senate by the President of the United States.

1. The first step is to identify the problem or question that needs to be addressed. This involves understanding the context and the specific requirements of the task.

2. Next, it is essential to gather relevant information and data. This can be done through research, consultation with experts, or by analyzing existing resources.

3. Once the information is gathered, the next step is to develop a plan or strategy. This involves breaking down the problem into smaller, manageable parts and determining the best approach to solve each part.

4. After the plan is developed, it is time to implement the solution. This involves putting the plan into action and monitoring the progress to ensure that the solution is effective.

5. Finally, it is important to evaluate the results of the solution. This involves comparing the actual outcomes with the expected results and identifying any areas for improvement.

such as t-shirts in the summer and hats and gloves in the winter, and other types of incentives such as coupons for groceries were given to the families.

29. The Defendants, and their agents, servants and employees, as required by the Study protocol, exercised charge, care, and/or control over 1906 E. Federal Street during the tenancy of the Plaintiff. In order to carry out the Study, the Defendants were required to, and undertook to decide which homes, including 1906 E. Federal Street, would receive interventions and what type of interventions each home would receive, Defendants and/or their agents, servants and employees undertook to solicit bids from contractors to perform the interventions, inspect the interventions made, and, upon completion pay the contractors for the work performed. By controlling the decisions about the scope of the repairs, the manner and means of repairs and the level of interventions to be performed, the Defendants exercised charge, care, and/or control over 1906 E. Federal Street during the Plaintiff's tenancy. Pursuant to Article 13, Section 105(hh) of the Baltimore City Housing Code, (the Housing Code), those who exercise charge, care, and/or control of residential rental dwellings are operators.

30. Pursuant to Article 13, Section 310(a) of the Baltimore City Housing Code, the Defendants, as operators were responsible for ensuring 1906 E. Federal Street was maintained in compliance with all provisions of the Housing Code during the tenancy of the Plaintiff.

31. Environmental Restorations, Inc. is a corporation organized and existing under the laws of the state of Maryland, having its principal place of business in Baltimore City, Maryland, having its principal place of business in

[illegible]



Baltimore City, Maryland, which charter upon information and belief has been forfeited since October 2, 1997.

32. Under Kennedy Krieger Institute, Johns Hopkins Hospital, Johns Hopkins University School of Medicine, Johns Hopkins University School of Public Health, and their agents, servants and employees' direction and control work was done by Environmental Restorations, Inc. in order to bring the property to experimental standards set by these Defendants.

33. Kennedy Krieger Institute, Johns Hopkins Hospital, Johns Hopkins University School of Medicine, Johns Hopkins University School of Public Health, and Environmental Restorations, Inc. by their agents, servants and employees were negligent in undertaking to abate, paint and repair the premises prior to the minor Plaintiff's occupancy and doing so in an unreasonable, incomplete, unworkmanlike and/or illegal manner.

34. Kennedy Krieger Institute, Johns Hopkins Hospital, Johns Hopkins University School of Medicine, Johns Hopkins University School of Public Health, and Environmental Restorations, Inc. by their agents, servants and employees were negligent in performing the lead abatement in such a fashion as to increase rather than decrease the children's exposure to lead, including, but not limited to, performing the abatement using methods which foreseeably increased the lead dust in the premises, performing improper or inadequate abatement and cleanup, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

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35. Kennedy Krieger Institute, Johns Hopkins Hospital, Johns Hopkins University School of Medicine, Johns Hopkins University School of Public Health, and their agents, servants and employees knew or should have known that the partial abatement methods used in the R&M study were not sufficient to remove the lead-based paint hazards in as much as Defendants had previously conducted studies indicating that lead-based paint dust remained in homes and/or returned to homes which received only partial abatements.

36. All Defendants failed to warn the Plaintiff or the Plaintiff's guardian of the lead hazard, which Defendants or their agents, servants and employees knew or should have known, or had reason to know existed in the premises.

37. At all times mentioned herein and material hereto, the defendants Kennedy Krieger Institute Inc., Johns Hopkins Hospital, Johns Hopkins University School of Medicine, and Johns Hopkins University School of Public Health, by and through their separate and respective agents, servants, workmen, representatives, physicians, nurses, staff, contractors, medical personnel, medical assistants and employees of these institutions, each of them respectively, jointly and severally, were charged with the professional responsibility of protecting the safety, health and welfare of children residing in the Study home, as the Study was designed, reviewed, conducted and approved by these institutions, the Study home was controlled by these institutions, and these institutions undertook contractual obligations benefitting the residents of the Study home.

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38. To ensure the safety of the children residing in the Study home these Defendants and their agents, servants and employees were charged with assessing the protocols of the Study to determine whether the Study itself was appropriate, and safe, whether the consent procedures were adequate, whether the methods to be employed met proper ethical standards, codes and regulations, whether reporting requirements were sufficient and assessment of various other aspects of the research. These Defendants were further charged with conveying all foreseeable risks as they became known and stopping the experiment once it became known that the experiment may result in unreasonable harm to residents of the Study home.

39. That as a result of careless, negligent and reckless conduct of the Defendants, herein by breaching duties arising out of contract, special relationships and regulations and codes by instituting the study in the first instance, failing to adequately warn or inform the residents of the Study home of all the inherent risks of the Study and the experimental nature of the Study, and failing to timely notify the residents of the Study home of pertinent information about the condition of the home as it became known, and failing to protect the safety, health and welfare of children residing in the Study home, Ashley Partlow was caused to suffer harmful elevated blood lead levels from ingestion and consumption of the paint and paint dust in the dwelling.

40. Defendants together, and each of them respectively jointly and severely, by and through their separate and respective agents, servants, work

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men, representatives, physicians, nurses, staff, contractors, medical personnel, medical assistants and employees were careless, negligent and reckless in:

- a. designing a non-therapeutic research protocol that inherent in its design foreseeably may bring higher than minimal risk of harm to young children;

- b. instituting a non-therapeutic research protocol that exposed young children to greater than minimal risk;

- c. instituting a research protocol that anticipated the possible accumulation of lead in the blood of otherwise health children as a result of the experiment;

- d. designing a research study that measured the success of abatement procedures by measuring the extent to which children's blood was being contaminated with a neurotoxin;

- e. failing to conform their conduct to ethical guidelines in research established by International ethical codes, including but not limited to the Declaration of Helsinki, the Nuremberg code and the Belmont Report;

- f. failing to conform their conduct to the prescribed standard of care upon researchers;

- g. failing to reasonably and properly assess the risks and benefits of the research Study;

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h. failing to disclose all information to residents of the Study home about the true nature of the experiment and the knowledge the researchers were attempting to gain;

i. failing to adequately warn prospective residents of the Study home prior to moving into the Study home as to the true experimental nature of the Study , the purpose of the Study, the researchers hypothesis in conducting the Study, the various levels of intervention in the Study homes, the foreseeable risks of residing in the Study home, the specific dangers and risks of exposure to lead in paint and dust, and the actual existence of lead paint and dust in the Study home so as to allow the children's parents to make an informed decision as to the appropriateness of residing in the Study home and participation in the Study;

j. failing to obtain proper informed consent from the plaintiff's guardian;

k. failing to adequately inform the residents of the Study home as to significant new findings developed during the course of the research, which related to the subjects willingness to continue residing in the Study home and participation in the Study;

l. failing to give timely notice as to the elevated blood lead levels of children residing in the Study home and enrolled in

[illegible]

the Study and the significance of these levels to the plaintiff's health, safety and welfare;

m. failing to give timely notice as to the results of lead dust testing in the Study home and the significance of these results to the plaintiff's health, safety and welfare;

n. failing to stop the experiment and remove the plaintiff from the Study home when children residing in the Study home began to suffer lead poisoning;

o. approving the experiment under expedited review procedures when review of the research did not meet the requirements of expedited review because it involved greater than minimal risk to children residing in the Study home and involved the taking of blood from minor children;

p. approving the Study when it failed to meet the standards for obtaining informed consent;

q. approving the Study when the IRB lacked professional competence necessary to review the Study in that it lacked a pediatrician or anyone familiar with lead paint poisoning;

r. encouraging participation in the Study and continual residence in the Study home and failing to minimize the possibility of coercion or undue influence by offering incentives such as food, money and clothing to subjects of low socioeconomic status;

My dear Mr. [Name],

I have your letter of the [Date] and am glad to hear from you.

I am well and hope this finds you the same.

I have not had time to write you more fully.

I am, however, very interested in the [Topic].

I have been thinking about it a great deal.

I am sure you will find it very interesting.

I am, dear Mr. [Name], very truly yours,

[Signature]

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s. failing to consider the vulnerable nature of the children and their guardians necessitating special considerations when designing the Study and soliciting participants;

t. failing to exercise reasonable care under all of the circumstances, in accordance with the accepted practices and procedures in the research community in which the defendants practiced;

u. failing to follow and abide by guidelines set forth by various governmental agencies;

v. failing to gain approval for the Study from the judicial branch of Maryland State Government when the research put at risk the health, safety and welfare of young children in Maryland;

w. failing to provide the children residing in the Study home maximum protection against risk.

41. And the Defendants were otherwise negligent.

42. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs – spleen, liver, kidneys – and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused

[illegible]

permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. Lead is released from bone over years. Thus leaving aside the actual, period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

43. Because of the disruption of normal cellular processes during critical stage of development of the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

44. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.

[illegible]



45. As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earning and diminution of earning capacity.

46. As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

47. The infant was otherwise injured and damaged.

48. The infant Plaintiff avers that all of these damages were and are due solely to the fraudulent, intentional wanton, willful, outrageous conduct and wrongful and negligent acts and omissions of the Defendants.

WHEREFORE, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims of Defendants and each of them respectively, jointly and severally five million dollars compensatory damages and one hundred million dollars punitive damages.

TWENTY SIXTH COUNT  
(LACK OF INFORMED CONSENT)

1. Plaintiff incorporates by reference paragraphs 1 through 48 of Count 25 as is fully set forth at length herein.

2. Defendants, and each of them respectively, failed to inform the Plaintiff's guardian of the risks of the research Study so as to afford the Plaintiff's guardian the opportunity to make an informed decision as to the appropriateness of participation in the Study.

3. The lack of informed consent includes, but is not limited to:

1. The first part of the document is a list of names and addresses, which appears to be a directory or a list of contacts. The names are written in a cursive script, and the addresses are listed below them. The list includes names such as "John A. Smith", "Mary E. Jones", and "Robert L. Brown".

2. The second part of the document is a list of names and addresses, which appears to be a directory or a list of contacts. The names are written in a cursive script, and the addresses are listed below them. The list includes names such as "John A. Smith", "Mary E. Jones", and "Robert L. Brown".

3. The third part of the document is a list of names and addresses, which appears to be a directory or a list of contacts. The names are written in a cursive script, and the addresses are listed below them. The list includes names such as "John A. Smith", "Mary E. Jones", and "Robert L. Brown".

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9. The ninth part of the document is a list of names and addresses, which appears to be a directory or a list of contacts. The names are written in a cursive script, and the addresses are listed below them. The list includes names such as "John A. Smith", "Mary E. Jones", and "Robert L. Brown".

10. The tenth part of the document is a list of names and addresses, which appears to be a directory or a list of contacts. The names are written in a cursive script, and the addresses are listed below them. The list includes names such as "John A. Smith", "Mary E. Jones", and "Robert L. Brown".

1. General Information  
 a. Name of the individual: [Redacted]  
 b. Date of birth: [Redacted]  
 c. Social Security Number: [Redacted]  
 d. Current address: [Redacted]  
 e. Date of entry into the country: [Redacted]  
 f. Current status: [Redacted]

[illegible]

- a. failing to state the risks of the toxic effects of childhood exposure to lead-based paint and dust;
- b. failing to state the researchers hypothesis in conducting the Study;
- c. failing to state all procedures utilized in the Study;
- d. failing to state the various levels of intervention in the Study homes;
- e. failing to state the exact limited nature of the repairs to the Study home;
- f. failing to state the researchers' knowledge as to the existence of hazardous levels of lead-based paint and dust in the Study home;
- g. failing to state the true experimental nature of the Study;
- h. failing to state the purpose of the Study;
- i. failing to state the foreseeable risks to the minor Plaintiff of residing in the Study home;
- j. failing to state the specific dangers and risks of exposure to lead in paint dust in the Study home;
- k. misrepresenting the fact that the home had received "special repairs" that made the Study home safe to live in;

[illegible]

l. misrepresenting the direct benefits of residing in the Study home and failing to adequately describe the risks associated with residing in the Study home;

m. failing to adequately describe the purpose of the Study to find cheaper cost-effective ways to do minimal repair to lead infected homes to benefit property owners;

n. failing to adequately disclose the financial interest that the researchers and the institutions had in the research Study;

o. failing to adequately describe the extent to which the researchers and the institutions had a conflict of interest;

p. failing to state that the research to be conducted was designed, in significant part, to measure the success of the abatement procedures by measuring the extent to which the children's blood while residing in the study home was being contaminated by a neurotoxin;

q. failing to state that the research protocol anticipated the possible accommodation of lead in the blood of otherwise healthy children.

4. As a result of the intentional tortious conduct of all the defendants named herein, and each of them respectively, by and through their separate and respective agents, servants, workman, representatives, physicians, nurses, staff,

1. The first part of the report deals with the general situation of the country and the progress of the work during the year. It is divided into two main sections: the first section deals with the general situation and the second section deals with the progress of the work.

2. The second part of the report deals with the results of the work during the year. It is divided into two main sections: the first section deals with the results of the work in the field of research and the second section deals with the results of the work in the field of education.

3. The third part of the report deals with the financial situation of the institution during the year. It is divided into two main sections: the first section deals with the income and the second section deals with the expenditure.

4. The fourth part of the report deals with the personnel of the institution during the year. It is divided into two main sections: the first section deals with the staff and the second section deals with the students.

5. The fifth part of the report deals with the future plans of the institution for the next year. It is divided into two main sections: the first section deals with the general plans and the second section deals with the specific plans.

contractors, medical personnel and employees, the minor Plaintiff was caused to suffer severe and permanent personal injuries and pain and suffering.

5. That as a result thereof and of the ingestion and consumption by the infant Plaintiff, of the paint dust in the dwelling, the infant Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

6. That the Plaintiff was exposed to toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs – spleen, liver and kidneys – and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body, is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years.

Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

7. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff

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was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

8. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity and extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered, the Plaintiff has developed behavioral and emotional problems.

As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

9. The Plaintiff was otherwise injured and damaged.

1. The first step in the process of the investigation is the identification of the problem. This is done by the investigator who is responsible for the investigation. The investigator must identify the problem and the scope of the investigation.

100-443887-100

1. The first of these is the fact that the Commission has not yet received any information from the Government of the United Kingdom regarding the proposed changes to the law of the sea.

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1. Name of the person	2. Address	3. City	4. State	5. Zip
Mr. J. Edgar Hoover	2400 Wilson Building	Washington, D.C.	D.C.	20535

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10. The infant Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendants.

WHEREFORE, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claim of Defendants and each of them respectively, jointly and severally five million dollars compensatory damages and 100 million dollars punitive damages.

TWENTY SEVENTH COUNT  
(COMMON LAW FRAUD/ INTENTIONAL MISREPRESENTATION)

1. Plaintiff incorporates by reference paragraphs 1 through 48 of Count Twenty Five and paragraphs 1 through 10 of Count Twenty Six as fully set at length herein.

2. Defendants made the following intentional misrepresentations and committed common law fraud in:

a. intentionally misrepresenting the risks of the toxic effects of exposure to lead-based paint and lead dust in the Study home;

b. intentionally failing to state the researchers hypothesis in conducting the Study;

c. intentionally failing to state all procedures utilized in the Study;

d. intentionally failing to state the various levels of intervention in the Study homes;

e. intentionally failing to state the exact limited nature of the repairs to the Study home;

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f. intentionally failing to state the researchers knowledge as to the existence of hazardous levels of lead-based paint and lead dust in the Study home;

g. intentionally failing to state the true experimental nature of the Study;

h. intentionally failing to state the purpose of the Study;

i. intentionally failing to state the foreseeable risks to the Plaintiff of residing in the Study home;

j. intentionally failing to state the specific dangers and risks of exposure to lead in paint and dust in the Study home;

k. intentionally misrepresenting the fact that the home had received "special repairs" that made the home safe to live in;

l. intentionally misrepresenting the direct benefits to the Plaintiff of residing in the study home and failing to adequately describe the risks associated with residing in the study home;

m. intentionally failing to adequately describe the purpose of the Study to find cheaper cost-effective ways to do minimal repair to lead infested homes to benefit property owners;



n. intentionally failing to adequately disclose the financial interest that the researchers and the institutions had in the Research Study.

o. intentionally failing to adequately describe the extent to which the researchers and the institutions had a conflict of interest;

p. intentionally failing to state that the research to be conducted was designed, in significant part, to measure the success of the abatement procedures by measuring the extent to which the children's blood while residing in the study home was being contaminated by a neurotoxin;

q. intentionally failing to state that the research protocol anticipated the possible accumulation of lead in the blood of otherwise healthy children;

r. intentionally encouraging participation in the Study and maximizing the possibility of coercion or undue influence by offering incentives such as food, money and clothing to subjects of low socioeconomic status, rather than focusing on protection of children residing in the study home;

s. intentionally aiding researchers in not complying with regulations designed to protect children used as subjects in non-therapeutic research;

[illegible]



t. intentionally misrepresenting the characteristics of the Study in order to avoid the responsibility inherent in non-therapeutic research involving children;

u. intentionally suggesting to the researchers a way to miscast the characteristics of the Study in order to avoid compliance with regulations designed to protect children used as subjects in non-therapeutic research;

v. intentionally approving the Study under expedited review, and avoiding a full panel review, when it was known the Study did not meet the requirements of expedited review;

w. intentionally failing to inform the prospective residents of the study home about the research Study until after they moved into the Study homes;

x. intentionally misrepresenting to the Study subjects that the research was therapeutic and of direct benefit to residents of the study home rather than non-therapeutic and experimental in nature;

y. intentionally failing to follow the Study protocol to timely inform participants of results and to perform additional repairs if lead dust levels increase;

z. intentionally misrepresenting that the study home complied with all applicable statutes, codes and regulations at the inception and throughout Plaintiff's residency, that the

The first thing I noticed when I stepped  
 out of the car was the smell of the sea.  
 It was a salty, bracing scent that  
 seemed to fill the air. I had heard  
 that the coast was beautiful, but I  
 didn't realize how much it would mean  
 to me. The sun was shining brightly,  
 and the waves were crashing against the  
 shore. I felt a sense of peace and  
 freedom that I had never experienced  
 before. The people were friendly and  
 the food was delicious. I was in  
 luck. This was exactly what I needed.  
 I had been feeling stressed and  
 overwhelmed for weeks. But here,  
 in this beautiful place, everything  
 seemed to fall into place. I was  
 finally at home.

study home was fit for human habitation and that the study home was safe for the residents to reside therein.

3. The intentional misrepresentations set forth above were done with intent to deceive and to induce the Plaintiff's guardian to participate in the research study along with her minor children.

4. The intentional misrepresentations set forth above were done with intent to deceive to gain institutional and governmental approval of the Study and avoid compliance with regulations designed to protect children used as subjects in non-therapeutic research.

5. The misrepresentations set forth above were done with the knowledge that the misrepresentations were false when made.

6. The Plaintiff's guardian justifiably and detrimentally relied upon the misrepresentations set forth above in making the decision as to whether to continue residence in the study home with her minor children and participate in the research Study.

7. As a direct and proximate result of Defendants' intentional and material misrepresentations as set forth above, the Plaintiff's guardian continued to reside in the study home with her minor children and participated in the research Study which ultimately resulted in severe and permanent personal injury and pain and suffering to the Plaintiff.

WHEREFORE, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claim of Defendants and each of them respectively, jointly



and severally five million dollars compensatory damages and one hundred million dollars punitive damages.

TWENTY EIGHTH COUNT  
(ADDITIONAL GROUNDS FOR PUNITIVE DAMAGES)

1. Plaintiff incorporates by reference paragraphs 1 through 48 of Count 25, paragraphs 1 through 10 of Count 26 and paragraphs 1 through 7 of count 27, as is fully set forth at length.

2. Defendants' actions as set forth above were fraudulent, intentional, wanton, willful, knowing, deliberate, outrageous, and done with an intent to deceive. Defendants were grossly negligent, and acted with reckless disregard of and with deliberate, callous and reckless indifference to the rights, interests, welfare and safety of the Plaintiff.

3. Defendants fraudulent, intentional, wanton, willful, knowing, deliberate, deceptive and outrageous actions consisted of, but are not limited to:

- a. intentionally misrepresenting the risks of the toxic effects of exposure to lead-based paint and lead dust in the Study home;
- b. intentionally failing to state the researchers hypothesis in conducting the Study;
- c. intentionally failing to state all procedures utilized in the Study;
- d. intentionally failing to state the various levels of intervention in the Study homes;

e. intentionally failing to state the exact limited nature of the repairs to the Study home;

f. intentionally failing to state the researchers knowledge as to the existence of hazardous levels of lead-based paint and lead dust in the Study home;

g. intentionally failing to state the true experimental nature of the Study;

h. intentionally failing to state the purpose of the Study;

i. intentionally failing to state the foreseeable risks to the Plaintiff of residing in the Study home;

j. intentionally failing to state the specific dangers and risks of exposure to lead in paint and dust in the Study home;

k. intentionally misrepresenting the fact that the home had received "special repairs" that made the home safe to live in;

l. intentionally misrepresenting the direct benefits of residing in the Study home and failing to adequately describe the risks associated with residing in the Study home;

m. intentionally failing to adequately describe the purpose of the Study to find cheaper cost-effective ways to do minimal repair to lead infested homes to benefit property owners;

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n. intentionally failing to adequately disclose the financial interest that the researchers and the institutions had in the Research Study.

o. intentionally failing to adequately describe the extent to which the researchers and the institutions had a conflict of interest;

p. intentionally failing to state that the research to be conducted was designed, in significant part, to measure the success of the abatement procedures by measuring the extent to which the children's blood while residing in the study home was being contaminated by a neurotoxin;

q. intentionally failing to state that the research protocol anticipated the possible accumulation of lead in the blood of otherwise healthy children;

r. intentionally encouraging participation in the Study and maximizing the possibility of coercion or undue influence by offering incentives such as food, money, and clothing to subjects of low socioeconomic status, rather than focusing on protection of children residing in the study home.

s. intentionally aiding researchers in not complying with regulations designed to protect children used as subject in non-therapeutic research;



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t. intentionally misrepresenting the characteristics of the Study in order to avoid the responsibility inherent in non-therapeutic research involving children;

u. intentionally suggesting to the researchers a way to miscast the characteristics of the Study in order to avoid compliance with regulations designed to protect children used as subjects in non-therapeutic research;

v. intentionally approving the Study under expedited review, and avoiding a full panel review, when it was known the Study did not meet the requirements of expedited review;

w. intentionally failing to inform the prospective residents of the study home about the research Study until after they moved into the Study homes;

x. intentionally misrepresenting to the Study subjects that the research was therapeutic and of direct benefit to residents of the study home rather than non-therapeutic and experimental in nature;

y. intentionally failing to follow the Study protocol to timely inform participants of results and to perform additional repairs if lead dust levels increase.

z. intentionally failing to conform to standards, codes and regulations designed to protect children at risk in non-therapeutic research;

[illegible]

aa. intentionally failing to conform to universal ethical codes designed to protect children at risk in non-therapeutic research including but not limited to the Declaration of Helsinki, the Nuremberg Code and the Belmont report.;

bb. intentionally failing to obtain proper informed consent from the plaintiff's guardian.

4. The misrepresentations set forth above were done with actual malice, intent to deceive and the knowledge that the misrepresentations were false when made.

5. Defendants fraudulent, intentional, wanton, willful, knowing, deliberate, deceptive and outrageous conduct was the direct result of defendants decision to sacrifice the health, safety and welfare of the children residing in the subject home in exchange for the fame, glory and monetary remuneration which defendants anticipated obtaining if this Study and follow up studies were successful.

6. By reason of the fraudulent, intentional, wanton, willful, knowing, deliberate, deceptive and outrageous conduct of defendants, as aforesaid, the minor Plaintiff was caused to sustain severe and permanent personal injuries and pain and suffering.

WHEREFORE, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claim of Defendants and each of them respectively, jointly and severally five million dollars compensatory damages and one hundred million dollars punitive damages.

[illegible]

## TWENTY NINTH COUNT

1. Plaintiff incorporates by reference paragraphs 1 through 48 of Count 25, paragraphs 1 through 10 of Count 26 paragraphs 1 through 7 of count 27, and paragraphs 1 through 6 of count 28 as is fully set forth at length.

2. For that all of the time mentioned herein the Defendants, Kennedy Krieger Institute, Inc., The Johns Hopkins Hospital, Johns Hopkins University, Johns Hopkins University School of Medicine, and Johns Hopkins University School of Public Health, operated and/or controlled, either individually or by the use of agents, servants and/or employees, a lot of ground known as 1906 E. Federal Street, in the City of Baltimore, State of Maryland which the Defendants either individually or by agents, servants or employees, managed, supervised, maintained and rented to tenants.

3. The Defendants as required by the Study protocol, exercised charge, care and/or control over 1906 E. Federal Street prior to and during the tenancy of the Plaintiff.

4. Pursuant to Article 13, Section 310 (a) of the Baltimore City Housing Code, the Defendants, as operators were responsible for ensuring that 1906 E. Federal Street was maintained in compliance with all provisions of the Housing Code during the tenancy of the Plaintiff.

5. The mother of the Plaintiff, Jacqueline Martin, was a tenant of the Defendants in their capacity as an operator, manager and/or controller of the 1906 E. Federal Street dwelling and paying rental therefore, or was otherwise a lawful resident or invitee, and the Plaintiff, Ashley Partlow, born December 10,

[illegible]

1988, lived in the dwelling or frequented the dwelling as an invitee of the tenant during 1994 -1995.

6. Both before and after the time the Plaintiff moved into the dwelling, the Defendants had either caused or allowed the continued existence of paint containing lead pigment on its interior and exterior walls, doors, floors, ceilings and woodwork and knowingly allowed said paint to chip and flake thereby rendering the dwelling dangerous and unfit for human habitation, especially for children of tender years.

7. During the time the Plaintiff resided in the dwelling, the Plaintiff ingested and consumed paint and dust containing lead and lead pigment thereby causing the Plaintiff to suffer the injuries, illness and infirmities herein alleged.

8. That the injuries, illness and infirmities of the Plaintiff were due alternatively or cumulatively to:

a) The negligence of the Defendants and/or the Defendants' agents, servants or employees in failing to warn the Plaintiffs of the lead hazard which the Defendants and/or the Defendants' agents, servants or employees knew or should have known or had reason to know existed in the premises.

b) The negligence of the Defendants in providing the premises to the Plaintiffs with already chipping, peeling and/or flaking surfaces in violation of the Baltimore City Housing Code and the Maryland Consumer Protection Act.

c) The negligence of the Defendants and/or the Defendants' agents in undertaking to paint and/or repair, and/or abate the premises prior to and/or during the child's occupancy and doing so in an unreasonable,



[illegible][illegible]

incomplete, unworkmanlike and/or illegal manner, which foreseeably resulted in the paint soon chipping, flaking and peeling or to remain chipping, flaking and peeling and exposing the child to the hazardous conditions complained of herein.

d) The negligence of the Defendants in failing to correct the condition of the loose, flaking paint in the dwelling, after notice either actual or constructive that the paint was in need of repair, when the Defendants or his agents knew or had reason to know that the paint was lead based paint and the Defendants or his agents had a reasonable opportunity to perform these repairs.

e) The negligence of the Defendants and/or the Defendants' agents in failing to completely and safely eradicate a lead paint hazard on the premises of which the Defendants and/or the Defendants' agents had been advised or was aware or should have been aware either personally or through agents.

f) The negligence of the Defendants in failing to promptly abate the lead hazard after notice, actual or constructive, of the same.

g) The negligence of the Defendants and/or the Defendants' agents in performing the lead abatement in such a fashion as to increase, rather than decrease, the child's exposure to lead, including, but not limited to, performing the abatement while the Plaintiff was still in the dwelling, failing to warn the Plaintiff or the Plaintiff's adult caretaker of the danger of the abatement and the need to vacate the dwelling, using abatement methods which foreseeably increased the lead dust in the premises, performing improper or

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inadequate clean up, leaving lead debris on the premises or in the vicinity of the premises accessible to the child.

h) The Defendants and/or the Defendants' agents failing to properly maintain the common areas of the dwelling so as to be free of loose, flaking lead based paint, or lead paint easily accessible to children.

j) The Defendants failed to obey the provisions of the Maryland Lead Poisoning Prevention Act, Maryland Code Environment 6-801 et seq.

9. At all times mentioned herein the Defendants or the agent, servant or employee of the Defendants who operated the property for the Defendants was aware of the dangers of lead paint and that older houses often contain lead paint and that the instant premises was an older house.

Further, at the time of the child's poisoning the general state of knowledge was such - as a result of legislative enactments, medical research announcements, public health education undertaken by Federal, State and Local governments and public health organizations, general media publicity in print, radio and television, publicity by trade and professional organizations of property owners and publicity and insurance premium adjustments by the insurance industry - that landlords in general knew or had reason to know or should have known of the dangers of lead based paint in older houses to children.

The Defendant was also aware of these dangers as a result of prior lead violations at this property, at other properties; as a result of prior or other lead paint claims or lead paint suits; and as a result of personal exposure to all of the sources of knowledge listed above in the preceding paragraph. Or the

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Defendant's agents possessed such knowledge as a result of all the sources listed preceding.

In addition the Defendant and/or workmen/agents of the Defendant visited the premises before and/or during the time the Plaintiff was there and at that time loose, flaking deteriorated paint was obvious and easily visible to a passerby on the interior and/or exterior of the dwelling and was seen or should have been seen by the person or persons visiting the dwelling.

Complaints regarding the deteriorated paint were also made to the Defendants and/or his agents before and/or after the child was poisoned and adequate repairs were not made in response in a timely and workmanlike fashion.

10. And the Defendant was otherwise negligent.

11. That as a result thereof and of the ingestion and consumption by the Plaintiff, of the paint and paint dust in the dwelling, the Plaintiff contracted and was caused to suffer harmful elevated blood lead levels.

12. That the Plaintiff was exposed to the toxic conditions complained of herein on each and every instance in which the Plaintiff was present at the property. Each and every instance of exposure resulted in the introduction of lead into the Plaintiff's bloodstream. This lead in the Plaintiff's bloodstream caused immediate permanent cellular damage in each instance. Lead was deposited in the Plaintiff's internal organs - spleen, liver, kidneys - and in the Plaintiff's brain and bones. In addition to the aforesaid immediate injury, the lead also caused permanent continuing chronic injury. Lead, once introduced into the human body,

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is very, very slowly eliminated. There is medical evidence from autopsy that in the brain it is never eliminated. Lead is released from bone over years. Thus, leaving aside the actual period of exposure, even after exposure ceased the Plaintiff continued with lead throughout the Plaintiff's body and during that entire following period the Plaintiff continued to suffer injury, disruption of normal bodily functions, and cellular destruction and retardation.

13. Because of the disruption of normal cellular processes during critical stages of development the Plaintiff suffered severe and permanent brain damage. The Plaintiff suffered physical pain and mental anguish. The Plaintiff was hospitalized and separated from home and family at a time in the Plaintiff's development when the Plaintiff was vulnerable to permanent psychological injury as a result. And such injury did result. The Plaintiff was subjected to a harrowing course of medical therapy by painful deep muscle needle injection over the course of many days. The Plaintiff required treatment by physicians and follow-up care necessitating time and expense.

14. Throughout the period after the Plaintiff's lead exposure the Plaintiff has endured the pains and humiliations and anguish caused by abnormal brain development and function as a result of brain damage from lead. The Plaintiff is not the person dictated by the Plaintiff's genetic and societal potential. The Plaintiff suffers a learning disability, shortened attention span, impulsivity, hyperactivity, extreme difficulty reading. The Plaintiff's IQ has been diminished significantly. As a direct and proximate result of the underlying physical brain damage suffered the Plaintiff has developed behavioral and emotional problems.



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As a result of the preceding the Plaintiff's employment prospects have been permanently altered resulting in lifetime loss of earnings and diminution of earning capacity.

As a result of all the preceding the Plaintiff suffered and suffers loss of the expected enjoyment of life and permanent alteration of reasonable pre-injury life expectations.

15. The Plaintiff was otherwise injured and damaged.

16. The Plaintiff avers that all of these damages were and are due solely to the wrongful and negligent acts and omissions of the Defendants.

WHEREFORE, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claim of Defendants and each of them respectively, jointly and severally five million dollars compensatory damages and 100 million dollars punitive damages.

#### THIRTIETH COUNT

1. The Plaintiff, Ashley Partlow, born December 10, 1988, incorporates herein the pertinent allegations of the preceding counts.

2. The Maryland Consumer Protection Act, Annotated Code of Maryland, Subtitle 3, Section 13-301 prohibits unfair or deceptive trade practices.

3. The representation that consumer realty has a characteristic, use or benefit that it does not have; or that it is of a particular standard or grade which it is not is an unfair or deceptive trade practice.

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4. The Defendants, Kennedy Krieger Institute, Inc., The Johns Hopkins Hospital, Johns Hopkins University, Johns Hopkins University School of Medicine, and Johns Hopkins University School of Public Health, by marketing through agents, servants and/or employees and otherwise making available to the public for lease, the dwelling described herein impliedly represented that the dwelling was in compliance with the Housing Code and other Public Local Laws of Baltimore City and statutes of the state of Maryland and of the United States and thus was fit for human habitation and contained no flaking, loose or peeling paint or plaster, or lead based paint accessible to children.

5. At the time the said dwelling was leased to the Plaintiff's mother, Jacqueline Martin, the Defendants and/or the Defendants' agents knew that the dwelling was not of such quality and contained flaking, loose or peeling paint or plaster or lead based paint accessible to children.

6. The Defendants therefore violated the Consumer Protection Act.

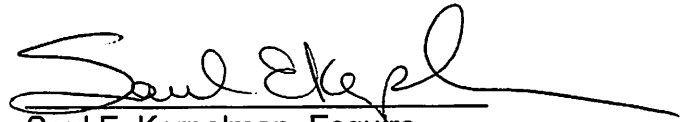
7. Section 13-408 of that act provides a cause of action for damages for violations of the act.

8. The injuries set out in the preceding counts resulted from the Defendants' violations of the act.

Wherefore, the Plaintiff, Ashley Partlow, born December 10, 1988, brings this action and claims of Defendants each of them respectively, jointly and severely

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 change is increasing. This is due to  
 a number of factors, including the  
 rapid growth of the world economy,  
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 environment, and the growing influence  
 of the Internet. These factors are  
 all contributing to a world that is  
 becoming more interconnected and  
 more complex than ever before.

five million dollars compensatory damages and one hundred million dollars punitive damages.



Saul E. Kerpelman, Esquire  
10 North Calvert Street, Suite 600  
Baltimore, MD 21202  
(410) 547-0202



Ashley Partlow	*	IN THE
Plaintiff	*	CIRCUIT COURT
v.	*	FOR
Ruth M. Mayo, et al.	*	BALTIMORE CITY
Defendants	*	

\* \* \* \* \*

SUMMONS

Mr. Clerk:

Please issue a Summons for each of the named Defendant(s) in

Ruth Marie Mayo, Individually and as Trustee  
Of the George and Marie Mayo Living Trust  
231 N. Duncan Street  
Baltimore, MD 21231

and

The Estate of Ruth Marie Mayo  
Serve on: Personal Representative  
231 N. Duncan Street  
Baltimore, MD 21231

and

George A. Mayo, Individually and as  
Trustee of the George and Marie Mayo  
Living Trust  
231 N. Duncan Street  
Baltimore, MD 21231

and

The Estate of George A. Mayo  
Serve on: Personal Representative  
231 N. Duncan Street  
Baltimore, MD 21231

and

George and Marie Mayo Living Trust  
231 N. Duncan Street





Baltimore, MD 21231

and

Linden Lakeview Properties, Inc.  
Serve on: Max Slaybough, R.A.  
2517 Linden Avenue  
Baltimore, MD 21217

and

Linden Lakeview Properties, Inc.  
Serve on: Ann Slaybough, R.A.  
2517 Linden Avenue  
Baltimore, MD 21217

and

Max Slaybough, Individually and as  
President of Linden-Lakeview  
Properties, Inc.  
2517 Linden Avenue  
Baltimore, MD 21217

and

The Estate of Max Slaybough  
Serve on: Personal Representative  
2517 Linden Avenue  
Baltimore, MD 21217

and

Lawrence M. Polakoff  
1906 E. Federal Street  
Baltimore, MD 21213

and

CFOD-2 Limited Partnership  
Serve on: Lawrence M. Polakoff  
1906 E. Federal Street  
Baltimore, MD 21213

and

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Chase Management Inc.  
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1906 E. Federal Street  
Baltimore, MD 21213

and

CFSP Limited Partnership  
Serve on: Lawrence M. Polakoff  
1906 E. Federal Street  
Baltimore, MD 21213

and

Kennedy Krieger Institute, Inc.  
(a Maryland Corporation)  
Serve on: James M. Anders, R.A.  
707 N. Broadway  
Baltimore, MD 21205

Environmental Restorations, Inc.  
Serve on: John S. Cobb, R.A.  
401 Washington Avenue, Suite 302  
Baltimore, MD 21204

and

The Johns Hopkins Hospital  
Serve on: Joanne Pollak, Esq., R.A.  
600 N. Wolfe Street  
Baltimore, MD 21205

and

Johns Hopkins University  
Serve on: Steven S. Durham, R.A.  
3400 N. Charles Street  
Baltimore, MD 21218

and

Johns Hopkins University School  
of Medicine  
Serve on: Steven S. Durham, R.A.  
3400 N. Charles Street  
Baltimore, MD 21218

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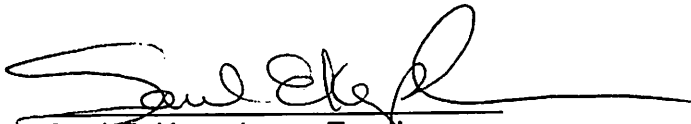
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and

Johns Hopkins University School  
of Public Health  
Serve on: Steven S. Durham, R.A.  
3400 N. Charles Street  
Baltimore, MD 21218

A handwritten signature in black ink, appearing to read "Saul E. Kerpelman", with a long horizontal flourish extending to the right.

Saul E. Kerpelman, Esquire  
Suite 600, The Equitable Building  
10 North Calvert Street  
Baltimore, Maryland 21202  
(410) 547-0202



Ashley Partlow

Plaintiff

v.

Ruth M. Mayo, et al.

Defendants

\*

\*

\*

\*

\*

IN THE

CIRCUIT COURT

FOR

BALTIMORE CITY

\* \* \* \* \*

ELECTION FOR JURY TRIAL

Clerk:

The Plaintiffs in the above-entitled case elect to have their case tried before a Jury.



Saul E. Kerpelman, Esquire  
10 North Calvert Street  
Suite 600, Equitable Bldg.  
Baltimore, Maryland 21202  
(410)547-0202



