

**IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO**

THE ESTATE OF JAMES WRIGHT
By Andrea Wright, Estate Representative
c/o Eadie Hill Trial Lawyers
3100 E. 45th St. Suite 400
Cleveland, Ohio 44127

Plaintiff,

vs.

OAKWOOD HEALTH CARE SERVICES, INC.
dba HERITAGE NURSING AND
REHABILITATION CENTER dba GRANDE
OAKS NURSING & REHABILITATION
c/o Registered Agent ERIC M. SIMON
200 PUBLIC SQUARE, SUITE 3500
CLEVELAND, OH 44114

and

EMBASSY HEALTHCARE MANAGEMENT,
INC. dba EMBASSY HEALTHCARE
c/o Registered Agent ERIC M. SIMON
200 PUBLIC SQUARE, SUITE 3500
CLEVELAND, OH 44114

and

EMBASSY HEALTHCARE, INC.
c/o Registered Agent ERIC M. SIMON
200 PUBLIC SQUARE, SUITE 3500
CLEVELAND, OH 44114

and

THE AVENUE CARE AND
REHABILITATION CENTER, a/k/a
PROGRESSIVE INTERCHANGE
HEALTHCARE LLC and AVENUE AT
WARRENSVILLE
c/o Registered Agent DHP Landerbrook, Inc.
5910 Landerbrook Ste 200
Mayfield Heights, Oh 44124

) **CASE NO.**

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(Refiled Case No. CV-18-892376)

JUDGE DAVID T MATIA

COMPLAINT

**With Jury Demand and Affidavit
of Merit**

and)
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 PROGRESSIVE QUALITY CARE, INC.)
 5553 Broadview Road)
 Parma, Ohio 44134)
)
 and)
)
 PROGRESSIVE INTERCHANGE LLC)
 c/o Registered Agent)
 DHP Landerbrook, Inc.)
 5910 Landerbrook Ste 200)
 Mayfield Heights, Oh 44124)

Defendants

The Estate of James Wright, by and through its administrator and next-of-kin of James Wright, Andrea Wright, for its Complaint against the above-captioned Defendants, states and avers upon information and belief:

INTRODUCTION

1. The Avenue and Grande Oaks Nursing Homes neglected James Wright so severely he developed bedsores, sepsis, and eventually leg amputation.
2. Plaintiff requests a trial by jury.
3. Plaintiff brings this action on behalf of the Estate of James Wright (Cuyahoga County Probate Court Case Number 2018EST234136), the next of kin of James Wright, and anyone else entitled to compensation for the harms and losses sustained as the result of the negligence and recklessness described herein or discovered during the litigation.
4. Plaintiff seeks punitive damages in an amount necessary to punish the above-named Defendants and deter them from engaging in similar conduct in the future.
5. Plaintiff also requests attorneys’ fees and the costs of this litigation.

6. James Wright became cognitively disabled and required a guardian, Andrea Wright, to be appointed, which appointment occurred on April 18, 2017. During the time of his cognitive impairment—which preceded appointment of the guardian—James Wright was incompetent and any statute of limitations period for any claims he had at the time he became incompetent were tolled through the time of his death on December 22, 2017. Plaintiff filed the original Complaint in this matter on January 31, 2018.

7. Defendants received, on or after August 7, 2017, notice pursuant to Ohio Revised Code section 2305.113 that James Wright possessed a medical, dental, optometric, or chiropractic claim against them and/or their agents, and was considering bringing an action upon that claim, which action could be commenced at any time within 180 days after the notice was given. Plaintiff filed the original Complaint in this matter on January 31, 2018, within 180 days of that notice being given.

8. This is a Re-Filed case, the original case number being 18-892376, and is being filed within 1 year of the dismissal without prejudice of that matter.

JURISDICTION AND VENUE

9. This Court has Jurisdiction over the Defendants because, among other things, all Defendants do, and all times relevant did, reside or have their domicile in the State of Ohio, purposefully avail themselves of the laws of the state of Ohio, and/or commit tortious acts within the state of Ohio.

10. Venue is proper in Cuyahoga County under Civil Rule 3 because, among other reasons: (a) Defendants reside, domicile, carry on their principal place of business, or practice medicine/nursing, in this county; and (b) part of the claim for relief arose in this county, in which county Plaintiff's Decedent was injured and died.

11. Pursuant to Ohio Civil Rule 10(D)(2), an Affidavit of Merit is attached.

VICARIOUS LIABILITY

12. The Defendants employ the care providers who were responsible for ensuring James Wright's care and safety.

13. Defendants manage, control, and/or employ the nursing staff at Grande Oaks and the Avenue at Warrensville.

14. James Wright and his family looked to the Defendants for care based upon their representations.

15. The Defendants are vicariously liable for the negligent actions of their employees and agents (*respondeat superior* and agency liability) and/or independent contractors (*Clark v. Southview* agency by estoppel), including visiting physicians and nurse practitioners contracted with any of the Defendants and / or provided to residents as default or house care providers.

CORPORATE MANAGEMENT OF NURSING FACILITIES LIKE GRANDE OAKS AND AVENUE AT WARRENSVILLE TO MAXIMIZE PROFIT

16. Defendants Oakwood Health Care Services, Inc. dba Heritage Nursing and Rehabilitation Center dba Grande Oaks Nursing & Rehabilitation, Embassy Healthcare Management, Inc. dba Embassy Healthcare, and Embassy Healthcare Inc. (the "Embassy Defendants") are Ohio for-profit corporations owned and controlled by Defendant Embassy Healthcare Inc. ("Embassy Healthcare"), responsible for providing care and services to residents of Grande Oaks, including James Wright.

17. Defendants the Avenue Care and Rehabilitation Center, A/K/A Progressive Interchange Healthcare LLC and Avenue at Warrensville, Progressive Quality Care, Inc., and Progressive Interchange LLC (the "Progressive Quality Defendants") are Ohio for-profit corporations owned and controlled by Defendant Progressive Quality Care Inc.

(“Progressive Quality Care”), responsible for providing care and services to residents of Avenue at Warrensville, including James Wright.

18. Progressive Quality Care and Embassy Healthcare are private, for-profit companies that hold themselves out to the public as providing skilled nursing & rehabilitative care to Ohio residents at their respective facilities.

19. Progressive Quality Care and Embassy Healthcare’s for-profit model means their primary goal is to maximize profit, measured by revenues (from residents and patients) minus expenses (the largest of which is staffing costs).

20. For nursing homes generally, the largest individual revenue source is residents (filling beds), and the largest individual expense is the cost of employing nursing staff to provide care to those residents. This creates a financial incentive to take on more residents with greater care needs than the nursing staff can properly care for, a violation of federal nursing home regulations regarding staffing levels.

21. Progressive Quality Care uses its for-profit model to manage nursing homes, including the amount and degree of care available, at numerous facilities throughout Ohio, including:

- a. Amherst Meadows Senior Community (1610 First Street N.E., Massillon, Ohio 44646)
- b. Avenue at Aurora (425 South Chillicothe Road, Aurora, OH 44202)
- c. Avenue at Medina (699 East Smith Rd, Medina, OH 44256)
- d. Avenue Care and Rehabilitation Center (4120 Interchange Corporate Ctr Rd., Warrensville Heights, OH 44128-5631)
- e. Avenue at Macedonia (9730 Valley View Road, Macedonia, Ohio 44056)
- f. Glendora Health Care Center (1552 North Honeytown Road, Wooster, Ohio 44691)

- g. Green Meadows Care Center (7770 Columbus Road N.E., Louisville, Ohio 44641)
- h. Parma Care Center (5553 Broadview Road, Parma, Ohio 44134)
- i. Pearl View Care Center (4426 Homestead Drive, Brunswick, Ohio 44212)
- j. Schoenbrunn Health Care (2594 East High Ave., New Philadelphia, Ohio 44663)

22. Embassy Healthcare uses its for-profit model to manage nursing homes, including the amount and degree of care available, at numerous facilities throughout Ohio, including:

- a. Autumnwood Nursing & Rehabilitation (275 E Sunset Dr., Rittman, OH, 330-927-2060)
- b. Broadway Care Center Nursing & Rehabilitation (16231 Broadway Ave., Maple Heights, OH, 216-662-0551)
- c. Carlisle Manor Nursing & Rehabilitation (730 Hillcrest Ave, Carlisle, OH, 937-746-2662)
- d. Crystal Care Center of Ashland Nursing & Rehabilitation (1251 E Main St., Ashland, OH, 419-281-9595)
- e. Forest Hills Center Nursing & Rehabilitation (2841 E Dublin Granville Rd., Columbus, OH, 614-891-1111)
- f. Grande Oaks Nursing & Rehabilitation (24579 Broadway Ave., Oakwood Village, OH, 440-439-7976)
- g. Grande Pavilion Nursing & Rehabilitation (24613 Broadway Ave, Oakwood Village, OH, 440-439-1448)
- h. Longmeadow Nursing & Rehabilitation (565 Bryn Mawr St., Ravenna, OH, 330-297-5781)
- i. Madison Healthcare Nursing & Rehabilitation (7600 S Ridge Rd., Madison, OH, 440-428-1492)
- j. Medina Meadows Nursing & Rehabilitation (550 Miner Dr, Medina, OH, 330-725-1550)
- k. The Northridge Health Center Nursing & Rehabilitation (35990 Westminister Ave, North Ridgeville, OH, 440-327-8511)

- l. Oak Hills Nursing & Rehabilitation (3650 Beavercrest Dr, Lorain, OH, 440-282-9171)
- m. Oakhill Manor Nursing & Rehabilitation (4466 Lynnhaven Avenue Northeast, Louisville, OH, 330-875-5060)
- n. Parkside Nursing & Rehabilitation (908 Symmes Rd., Fairfield, OH, 513-868-6500)
- o. Royal Oak Nursing & Rehabilitation (6973 Pearl Rd, Middleburg Heights, OH, 440-884-9191)
- p. Seasons Nursing & Rehabilitation (456 Seasons Rd., Stow, OH, 330-688-5553)
- q. Shady Lawn Nursing & Rehabilitation (15028 Old Lincoln Way, Dalton, OH, 330-828-2278)
- r. Shaker Gardens Nursing & Rehabilitation (3550 Northfield Rd, Shaker Heights, OH, 216-752-5600)
- s. Shaker Gardens Assisted Living (3550 Northfield Rd, Shaker Heights, OH, 216-752-5600)
- t. Solon Pointe Nursing & Rehabilitation (5625 Emerald Ridge Pkwy, Solon, OH, 440-498-3000)
- u. The Oaks at Shady Lawn Assisted Living (15028 Old Lincoln Way, Dalton, OH, 330-828-2278)
- v. The Woods at Solon Pointe Assisted Living (5625 Emerald Ridge Pkwy, Solon, OH, 440-498-3000)
- w. Willow Park Nursing & Rehabilitation (18810 Harvard Ave., Cleveland, OH, 216-752-3600)

23. Progressive Quality Care and Embassy Healthcare exercise actual control over their facilities' management and operations to maximize profits.

24. Through this control, they make decisions that affect the day-to-day care of residents at their facilities, including James Wright, making them responsible for the foreseeable harm that results from careless decisions while voluntarily exercising that control.

25. Progressive Quality Care has more than 100 employees.
26. Embassy Healthcare has more than 100 employees.

NURSING HOME MANDATORY REPORTING OF FACILITY RESIDENT CARE NEEDS (“RUG SCORES”), FINANCES, AND STAFFING LEVELS

27. Every nursing home receiving Medicare or Medicaid funding—including those at issue in this case—is required to report significant amounts of data to the federal agency that oversees operations of nursing homes receiving federal or state funding, the Centers for Medicare and Medicaid Services, or “Medicare.”

28. The data Defendants submit to Medicare regarding its facility includes data on its residents (numbers, care needs, and bed days), its finances, and its nurse and nursing aide staffing levels as compared to resident care needs.

29. This information is contained in “Minimum Data Set” evaluations of residents’ care needs and treatment, and “cost reports” containing information on the facilities’ staffing levels, pay scales, hours worked, payments to companies treated as commonly owned (called “related-party transactions”), and more.

30. Medicare uses some of this data submitted by Defendants to produce its nursing home 5-star rating system, also known as “Nursing Home Compare,” which the Defendants use to market their facilities, and upon which the public may rely in selecting or evaluating nursing homes.

31. This data is certified correct by the Defendants and/or submitted under penalty of perjury and/or civil or criminal penalties.

32. Nursing homes provide detailed information regarding the health status, care and treatment, and services provided to each resident in the facility using a standardized electronic questionnaire called the **Minimum Data Set**, or **MDS**.

33. This evaluation is done for all nursing home residents regardless of whether their care is being paid for by Medicare.

34. Nursing homes are required to evaluate every resident using the Minimum Data Set questionnaire shortly after the time of admission, every 90 days thereafter, when a resident has a significant improvement or decline in health (physical, mental, or psychosocial), and upon discharge.

35. Based on this Minimum Data Set, each resident's individual care needs (called "acuity level") are assigned into a group signifying how much nursing or staff care the resident requires, called a **Resource Utilization Group** score, or **RUG score**.

36. Each resident's Resource Utilization Group score is contained in section Z of their Minimum Data Set evaluations, meaning the total care needs of the residents in any facility at a specific time is available by totaling the residents' Resource Utilization Group scores from their Minimum Data Set evaluations.

37. Medicare has commissioned and made available to every nursing home studies and data showing the number of minutes of nursing and nursing aide care a person at a specific RUG level should be expected to require, which Medicare calls "expected staffing."

38. When these Resource Utilization Group scores are combined for all residents in a nursing home facility, the nursing home knows exactly how many minutes of nursing and nursing aide care should be provided, on average, to meet the expected care needs of their residents.

39. Despite this information, Defendants intentionally understaff the facilities to make more money, with the predictable outcome being increased preventable resident

injuries and deaths from things like falls, dehydration, malnutrition, bedsores (pressure ulcers), and infections like urinary tract infections.

**SYSTEMIC UNDERSTAFFING COVERED UP BY
MISLEADING ADVERTISING**

40. To persuade the families of patients to become customers, and other health care providers to refer them residents, Defendants make promises to the families of such potential residents that they will provide a level of care that they know they are incapable of providing.

41. Contrary to their claims, they systemically understaff facilities, making provision of adequate care to residents impossible.

42. Systemic understaffing leads to poor outcomes because the nursing staff is overworked and unable to provide needed care to all residents, such as turning and positioning (leading to bedsores), changing incontinent residents (leading to bedsores and infections), toileting residents (leading to increased falls and other issues), and assisting residents with eating and drinking (leading to dehydration, malnutrition, choking, and other complications).

43. The Defendants were on notice of the types of failures of care occurring at their facilities, but consciously disregarded their residents' (including James Wright's) rights and safety with a great probability of causing substantial harm.

44. The intent and outcome of their misleading advertising is to cause residents, their families, and external care providers to believe the nursing facility is much better staffed than it is, while they drastically limit the budget and overhead needed to run a safe facility to maximize profits and syphon resources at the expense of patient safety.

45. This systemic understaffing is part of Progressive Quality Care and Embassy Healthcare's approach to maximizing profits for its owners, as evidenced by similar poor staffing levels at some of their other Ohio nursing homes.

SYSTEMIC UNDERSTAFFING HARMED JAMES WRIGHT

46. Progressive Quality Care failed to ensure, through their operational, budgetary, consultation and managerial decisions and actions, that Avenue at Warrensville was sufficiently staffed to meet the individual needs of James Wright.

47. Embassy Healthcare failed to ensure, through their operational, budgetary, consultation and managerial decisions and actions, that Grande Oaks was sufficiently staffed to meet the individual needs of James Wright.

48. Defendants engaged in a systemic practice to understaff the nursing home facilities to maximize its profits at the expense of residents' care.

49. This lack of sufficient staff directly resulted in James Wright not receiving basic and necessary services to prevent, among other things, neglect leading to injuries and death.

PROGRESSIVE QUALITY CARE DEFENDANTS' NEGLIGENCE AND RECKLESSNESS WITH JAMES WRIGHT'S CARE

50. Defendants received James Wright as a nursing home resident at the Avenue at Warrensville in June, 2016, and agreed to provide care to him in exchange for monetary payment.

51. At the time of accepting James Wright, he had no skin breakdowns, called bedsores or pressure ulcers.

52. James Wright needed assistance with turning and repositioning to avoid skin breakdowns, getting medications, staying clean, providing care and treatment to

wounds, observing for significant changes in condition, and preventing wounds from becoming infected.

53. Avenue at Warrensville failed to meet these care needs.

54. Avenue at Warrensville's lack of care included:

- a. Failing to respond to call lights for James Wright and other residents in a timely way;
- b. Causing James Wright to develop multiple pressure ulcers; and
- c. Causing James Wright to suffer from urinary tract infections.

55. The Avenue allowed James to get Stage 2 pressure sores on his coccyx, stage 2 wounds on his right and left heels, and deep tissue injuries on his genitals.

56. On August 11, 2016 James was transferred to Select Specialty Hospital, Cleveland Fairhill location, where they discovered an unstageable Sacral decubitus ulcer measuring 8 x 8.5 x 0.2 cm, covered with 40% yellowish dead tissue ("slough"); a Stage 2 pressure ulcer on the right heel measuring 0.7 x 3 x 0.1 cm ; an unstageable Left heel pressure ulcer measuring 4.5 x 6 cm and covered with dry, black, hard necrotic tissue ("eschar") about 40% of the wound; and a wound over his perianal area measuring 0.5 x 0.5 x 0.1 cm.

57. During the month he was there, Select Specialty cared for James Wright and treated his pressure sores. All his sores improved.

EMBASSY HEALTHCARE DEFENDANTS' NEGLIGENCE AND RECKLESSNESS WITH JAMES WRIGHT'S CARE

58. The Embassy Defendants received James Wright as a nursing home resident at Grande Oaks in September, 2016, and agreed to provide care to him in exchange for monetary payment.

59. At the time of accepting James Wright, he had bedsores (also called pressure ulcers) that had been treated and were healing.

60. James Wright needed assistance with turning and repositioning to avoid skin breakdowns, getting medications, staying clean, providing care and treatment to wounds, observing for significant changes in condition, and preventing wounds from becoming infected.

61. Grande Oaks failed to meet these care needs.

62. Grande Oaks's lack of care included:

- a. Failing to respond to call lights for James Wright and other residents in a timely way;
- b. Causing James Wright's bedsores to worsen significantly, eventually causing the need for amputation;
- c. Causing James Wright to become septic;
- d. Causing James Wright to become dehydrated and suffer an acute kidney injury; and
- e. Causing James Wright to suffer from urinary tract infections.

63. James Wright died as the result of lack of adequate care on December 22, 2017.

FIRST CAUSE OF ACTION
(SURVIVORSHIP / NEGLIGENCE / RECKLESSNESS)

64. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

65. James Wright depended on the Defendants, and their respective nursing and medical staff, for medical and nursing care, treatment, evaluation, and assistance.

66. The Defendants, including their medical and nursing staff, failed to provide proper care and treatment to James Wright, which they knew or should have known he required, resulting in his injury and December 22, 2017 death.

67. The Defendants' failure to provide proper care and treatment included, but is not limited to:

- a. Choosing to put inadequate prevention and response interventions in place to prevent or treat bedsores and infections;
- b. Choosing to provide inadequate resident observation, supervision, and monitoring to prevent or treat bedsores and infections;
- c. Choosing to provide too few, and / or underqualified nursing staff members for the resident needs at the facility to protect and provide adequate care to residents like James Wright;
- d. Choosing to not provide accurate, adequate, or timely information to James Wright's family;
- e. Choosing to violate state and federal regulations governing care and staffing levels in nursing home facilities by which residents like James Wright are a member of the class of persons intended to be protected from injuries like those he suffered; and
- f. Such other acts or omissions described in this Complaint or discovered in litigation.

68. The Defendants and their medical and nursing staff provided care to James Wright that fell below the standard of care expected of medical care and nursing home organizations, under the same or similar circumstances.

69. As a direct and proximate result of the negligence described above, James Wright sustained permanent injury and loss including, but not limited to, conscious pain and suffering, disability, and significant medical expenses and these physical injuries caused his untimely and wrongful death on December 22, 2017.

70. WHEREFORE, Plaintiff demands judgment against the Defendants, jointly, in an amount more than Twenty-Five Thousand Dollars (\$25,000.00), for conscious pain

and suffering, medical expenses, loss of enjoyment, together with costs of suit, attorney's fees and expenses, punitive and exemplary damages, and any other relief to which the decedent may be entitled to and/or that the court finds is appropriate and/or equitable.

SECOND CAUSE OF ACTION
(WRONGFUL DEATH, ORC 2125.01 ET SEQ.)

71. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

72. Plaintiff brings this Cause of Action pursuant to Ohio's Wrongful Death Statute for the benefit of James Wright's heirs and next of kin who have suffered loss and damage due to James Wright's wrongful and untimely death on December 22, 2017.

73. As a direct and proximate result of the negligence/recklessness described above, James Wright sustained physical injuries that caused his untimely and wrongful death on December 22, 2017.

74. Plaintiff and James Wright's additional next-of-kin suffered damages as set forth in the Ohio Wrongful Death statute, including mental anguish and grief, medical and funeral expenses, and loss of decedent's support, services, society and companionship.

75. WHEREFORE, Plaintiff demands judgment against the Defendants, jointly, in an amount more than Twenty-Five Thousand Dollars (\$25,000.00) to compensate the decedent's next of kin and heirs at law, together with costs of suit, attorney's fees and expenses, exemplary damages, and any other relief the court finds is appropriate and/or equitable.

THIRD CAUSE OF ACTION
(NURSING HOME RESIDENT RIGHTS VIOLATION R.C. 3721.13)

76. Plaintiff incorporates all other paragraphs of this Complaint as if fully rewritten herein.

77. Defendants, directly or through their employees or agents, violated James Wright's rights as a resident of the Defendants' facilities, as enumerated in R.C. 3721.13, including, but not limited to, the right to adequate and appropriate medical treatment and nursing care.

78. These violations constitute negligence *per se* and give rise to a statutory cause of action.

79. As a direct and proximate result of Defendants' violations of R.C. 3721.13, James Wright endured conscious pain and suffering and disability, incurred medical expenses, suffered his untimely death on December 22, 2017, and was otherwise harmed.

80. WHEREFORE, Plaintiff demands judgment against the Defendants, jointly, in an amount more than Twenty-Five Thousand Dollars (\$25,000.00), together with costs of suit, attorney's fees and expenses, punitive and exemplary damages, and any other relief to which the court finds is appropriate and/or equitable.

A TRIAL BY JURY IS HEREBY DEMANDED.

/s/ William B. Eadie

WILLIAM B. EADIE (0085627)

MICHAEL A. HILL (0088130)

EADIE HILL TRIAL LAWYERS

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Counsel for Plaintiff

STATE OF OHIO

CUYAHOGA COUNTY

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AFFIDAVIT OF MERIT

Affiant MARK SHOAG, M.D., having been first duly sworn, states:

1. I am an adult, with no known disability preventing my truthful testimony, and have personal knowledge of the matters contained within this affidavit.

2. I am a full-time practicing physician in the fields of Geriatric and Internal Medicine, licensed in the state of Ohio, board certified in Internal Medicine, and a medical director of a long-term acute care hospital, spending more than 50% of my professional time providing direct patient care.

3. Through my specialized knowledge, skill, training, experience, and education, I am familiar with the standard of care applicable to the medical and nursing care and treatment that was provided to James Wright while he was a resident of The Avenue Care and Rehabilitation Center and Grande Oaks Nursing & Rehabilitation Center.

4. I have reviewed all medical records reasonably available to the Estate of James Wright concerning the allegations of negligence causing his injuries.

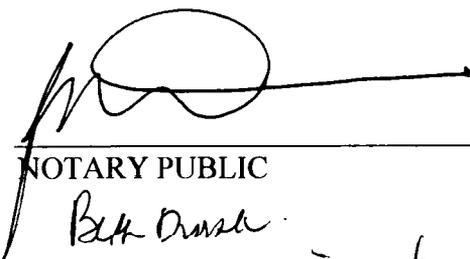
5. To a reasonable degree of medical probability, it is my opinion that the medical and nursing care and treatment provided to James Wright by The Avenue Care and Rehabilitation Center and Grande Oaks Nursing & Rehabilitation Center deviated from the established standard of care and the breach caused injury to James Wright, including his death.

FURTHER AFFIANT SAYETH NAUGHT.



MARK SHOAG, M.D.

SWORN TO BEFORE ME and subscribed in my presence this 22 day of April, 2019.



NOTARY PUBLIC

Beth Orsak

My commission expires 12/31/19

Present to RC §147.03



NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113

Court of Common Pleas

New Case Electronically Filed:
May 28, 2019 08:16

By: WILLIAM B. EADIE 0085627

Confirmation Nbr. 1720419

THE ESTATE OF JAMES WRIGHT

CV 19 915928

vs.

OAKWOOD HEALTH CARE SERVICES, INC., ET AL

Judge: DAVID T. MATIA

Pages Filed: 17