

VIRGINIA :

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

K.E.E., *et al.*,

Plaintiffs,

v.

Case No. CL20005209-00

CUMBERLAND HOSPITAL, LLC d/b/a
CUMBERLAND HOSPITAL FOR CHILDREN
AND ADOLESCENTS, ET AL.,

Defendants.

ANSWER OF DEFENDANTS

DANIEL N. DAVIDOW AND DANIEL M. DAVIDOW, M.D., P.C.

Come now, defendants Daniel N. Davidow, M.D. and Daniel N. Davidow, M.D., P.C., ("Davidow defendants") by counsel, and state the following for their Answer to Plaintiffs' Complaint:

1. The allegations in Paragraph 1 are not factual, but call for a legal conclusion to which no response is required. To the extent an answer is deemed necessary, the allegations are denied for the reasons set forth in the Davidow defendants contemporaneously filed Motion to Sever Misjoined Parties.

2. It is admitted that there are more than six plaintiffs as alleged in Paragraph 2. The Davidow defendants deny that these plaintiffs are properly joined.

3. The allegations in Paragraph 3 are denied.

4. The allegations in Paragraph 4 are denied.

5. The allegations in Paragraph 5 are denied.

6. The allegations in Paragraph 6 are denied.

7. The allegations in Paragraph 7 are denied.

8. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 8 and, therefore, the allegations are denied and strict proof is demanded.

9. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 9 and, therefore, the allegations are denied and strict proof is demanded.

10. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 10 and, therefore, the allegations are denied and strict proof is demanded.

11. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 11 and, therefore, the allegations are denied and strict proof is demanded. The allegations

12. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 12 and, therefore, the allegations are denied and strict proof is demanded.

13. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 13 and, therefore, the allegations are denied and strict proof is demanded.

14. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 14 and, therefore, the allegations are denied and strict proof is demanded.

15. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 15 and, therefore, the allegations are denied and strict proof is demanded.

16. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 16 and, therefore, the allegations are denied and strict proof is demanded.

17. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 17 and, therefore, the allegations are denied and strict proof is demanded.

18. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 18 and, therefore, the allegations are denied and strict proof is demanded.

19. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 19 and, therefore, the allegations are denied and strict proof is demanded.

20. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 20 and, therefore, the allegations are denied and strict proof is demanded.

21. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 21 and, therefore, the allegations are denied and strict proof is demanded.

22. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 22 and, therefore, the allegations are denied and strict proof is demanded.

23. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 23 and, therefore, the allegations are denied and strict proof is demanded.

24. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 24 and, therefore, the allegations are denied and strict proof is demanded.

25. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 25 and, therefore, the allegations are denied and strict proof is demanded.

26. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 26 and, therefore, the allegations are denied and strict proof is demanded.

27. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 27 and, therefore, the allegations are denied and strict proof is demanded.

28. The allegations in Paragraph 28 are not factual, but call for a legal conclusion, to which no response is required. To the extent an answer is deemed required, the allegations are denied. The Davidow defendants reserve the right to move the court for the party plaintiffs to proceed without anonymity.

29. The allegations in Paragraph 29 do not pertain to the Davidow defendants and, therefore, no response is required.

30. The allegations in Paragraph 30 do not pertain to the Davidow defendants and, therefore, no response is required.

31. The allegations in Paragraph 31 do not pertain to the Davidow defendants and, therefore, no response is required.

32. The allegations in Paragraph 32 do not pertain to the Davidow defendants and, therefore, no response is required.

33. The allegations in Paragraph 33 do not pertain to the Davidow defendants and, therefore, no response is required.

34. The allegations in Paragraph 34 do not pertain to the Davidow defendants and, therefore, no response is required.

35. The allegations in Paragraph 35 do not pertain to the Davidow defendants and, therefore, no response is required.

36. The allegations in Paragraph 36 do not pertain to the Davidow defendants and, therefore, no response is required.

37. The allegations in Paragraph 37 do not pertain to the Davidow defendants and, therefore, no response is required.

38. The allegations in Paragraph 38 are admitted.

39. The allegations in Paragraph 39 are admitted.

40. Defendant Davidow admits he has been the Medical Director at Cumberland Hospital since 1998. The remaining allegations in Paragraph 40 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

41. The allegations in Paragraph 41 do not pertain to the Davidow defendants and, therefore, no response is required.

42. The allegations in Paragraph 42 do not pertain to the Davidow defendants and, therefore, no response is required.

43. The allegations in Paragraph 43 are not factual, but call for a legal conclusion, to which no response is required. To the extent an answer is deemed required, the Davidow defendants do not challenge or contest personal jurisdiction.

44. The allegations in Paragraph 44 do not pertain to the Davidow defendants and, therefore, no response is required.

45. The allegations in Paragraph 45 are not factual, but call for a legal conclusion, to which no response is required. To the extent an answer is deemed required, the allegations are denied.

46. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 46.

47. The allegations in Paragraph 47 do not pertain to the Davidow defendants and, therefore, no response is required.

48. The allegations in Paragraph 48 do not pertain to the Davidow defendants and, therefore, no response is required.

49. The allegations in Paragraph 49 do not pertain to the Davidow defendants and, therefore, no response is required.

50. The allegations in Paragraph 50 do not pertain to the Davidow defendants and, therefore, no response is required.

51. The allegations in Paragraph 51 do not pertain to the Davidow defendants and, therefore, no response is required.

52. The allegations in Paragraph 52 do not pertain to the Davidow defendants and, therefore, no response is required.

53. The allegations in Paragraph 53 do not pertain to the Davidow defendants and, therefore, no response is required.

54. The allegations in Paragraph 54 do not pertain to the Davidow defendants and, therefore, no response is required.

55. The allegations in Paragraph 55 do not pertain to the Davidow defendants and, therefore, no response is required.

56. The allegations in Paragraph 56 do not pertain to the Davidow defendants and, therefore, no response is required.

57. The allegations in Paragraph 57 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is deemed necessary, the allegations are not factual but require expert testimony and, as such, they are denied and strict proof is demanded.

58. The allegations in Paragraph 58 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is deemed necessary, the allegations are not factual but require expert testimony and, as such, they are denied and strict proof is demanded.

59. The allegations in Paragraph 59 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is deemed necessary, the allegations are not factual but require expert testimony and, as such, they are denied and strict proof is demanded.

60. The allegations in Paragraph 60 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is deemed necessary, the allegations are not factual but require expert testimony and, as such, they are denied and strict proof is demanded.

61. The allegations in Paragraph 61 do not pertain to the Davidow defendants and, therefore, no response is required.

62. The allegations in Paragraph 62 do not pertain to the Davidow defendants and, therefore, no response is required.

63. To the extent that the allegations in Paragraph 63 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

64. To the extent that the allegations in Paragraph 64 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

65. To the extent that the allegations in Paragraph 65 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

66. To the extent that the allegations in Paragraph 66 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

67. To the extent that the allegations in Paragraph 67 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

68. To the extent that the allegations in Paragraph 68 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

69. To the extent that the allegations in Paragraph 69 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

70. To the extent that the allegations in Paragraph 70 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

71. To the extent that the allegations in Paragraph 71 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

72. To the extent that the allegations in Paragraph 72 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

73. To the extent that the allegations in Paragraph 73 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

74. The allegations in Paragraph 74 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is deemed necessary, the allegations are denied and strict proof is demanded.

75. The allegations in Paragraph 75 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is deemed necessary, the allegations are denied and strict proof is demanded.

76. The allegations in Paragraph 76 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is deemed necessary, the allegations are denied and strict proof is demanded.

77. The allegations in Paragraph 77 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is deemed necessary, the allegations are denied and strict proof is demanded.

78. The allegations in Paragraph 78 do not pertain to the Davidow defendants and, therefore, no response is required.

79. The allegations in Paragraph 79 do not pertain to the Davidow defendants and, therefore, no response is required.

80. The allegations in Paragraph 80 do not pertain to the Davidow defendants and, therefore, no response is required.

81. The allegations in Paragraph 81 do not pertain to the Davidow defendants and, therefore, no response is required.

82. The allegations in Paragraph 82 do not pertain to the Davidow defendants and, therefore, no response is required.

83. The allegations in Paragraph 83 appear to be a partial quote from a portion of a document; and the full document speaks for itself.

84. The allegations in Paragraph 84 do not pertain to the Davidow defendants and, therefore, no response is required.

85. The allegations in Paragraph 85 appear to be a partial quote from a portion of a document; and the full document speaks for itself.

86. To the extent that the allegations in Paragraph 86 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

87. To the extent that the allegations in Paragraph 87 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

88. To the extent that the allegations in Paragraph 88 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

89. To the extent that the allegations in Paragraph 89 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

90. To the extent that the allegations in Paragraph 90 are directed to the Davidow defendants, the allegations are denied.

91. To the extent that the allegations in Paragraph 91 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

92. The allegations in Paragraph 92 do not pertain to the Davidow defendants and, therefore, no response is required.

93. To the extent that the allegations in Paragraph 93 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

94. To the extent that the allegations in Paragraph 94 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

95. The allegations in Paragraph 95 do not pertain to the Davidow defendants and, therefore, no response is required.

96. To the extent that the allegations in Paragraph 96 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

DANIEL N. DAVIDOW

97. The Davidow defendants admit that Defendant Davidow, at all relevant times herein, held a license to practice medicine in Virginia. Dr. Davidow

has a specialty in Adolescent Medicine. The remaining allegations in Paragraph 97 are denied and strict proof is demanded.

98. The Davidow defendants admit that Defendant Davidow assumed the role of Medical Director for Cumberland Hospital in 1998 and held such position until 2020. The remaining allegations in Paragraph 98 are denied and strict proof is demanded.

99. Defendant Davidow admits that during his time at Cumberland Hospital he was involved with patient admission(s).

100. Defendant Davidow admits that he gave multiple lectures in Grand Rounds format across the country, and he could often follow up on discharged patients at those times.

101. The Davidow defendants admit that during Defendant Davidow's time at Cumberland Hospital he was involved in the admission of a substantial number of patients. Further answering, the Davidow defendants are without knowledge of the identity of the plaintiffs and are, therefore, without information sufficient to admit or deny whether defendant Davidow performed admission exams on all plaintiffs.

102. The Davidow defendants admit that an admission exam was part of the admission process for new patients at Cumberland Hospital and that Defendant Davidow routinely performed such exams.

103. The allegations of Paragraph 103 are denied and strict proof is demanded.

104. The allegations of Paragraph 104 are denied and strict proof is demanded.

105. The allegations of Paragraph 105 are denied and strict proof is demanded.

106. The allegations of Paragraph 106 are denied and strict proof is demanded.

107. The allegations of Paragraph 107 are denied and strict proof is demanded.

108. To the extent that the allegations in Paragraph 108 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

109. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 109 and, therefore, the allegations are denied and strict proof is demanded. The Davidow defendants further deny that Defendant Davidow committed any acts of sexual abuse.

110. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 110 and, therefore, the allegations are denied and strict proof is demanded. The Davidow defendants further deny that Defendant Davidow committed any acts of sexual abuse.

111. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 111 and, therefore, the allegations are denied and strict proof is demanded. The Davidow defendants further deny that Defendant Davidow committed any acts of sexual abuse.

112. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 112 and, therefore, the allegations are denied

and strict proof is demanded. The Davidow defendants further deny that any sexual abuse occurred.

113. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 113 and, therefore, the allegations are denied and strict proof is demanded. The Davidow defendants deny that the admission exam was different for males and females with respect to checking femoral pulses and further deny that any sexual abuse occurred at any time on any patient.

114. To the extent that the allegations in Paragraph 114 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. Further, the Davidow defendants deny that any sexual abuse occurred.

115. To the extent that the allegations in Paragraph 115 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. Further, the Davidow defendants deny that any sexual abuse occurred.

116. To the extent that the allegations in Paragraph 116 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. Further, the Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or that he was a danger to patients.

117. To the extent that the allegations in Paragraph 117 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. Further, the Davidow defendants deny that any sexual abuse occurred.

K.E.E.

118. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 118 and, therefore, the allegations are denied and strict proof is demanded.

119. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 119 and, therefore, the allegations are denied and strict proof is demanded.

120. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

121. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

122. To the extent that the allegations in Paragraph 122 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are

without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

123. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 123 and, therefore, the allegations are denied and strict proof is demanded.

M.J.M.

124. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 124 and, therefore, the allegations are denied and strict proof is demanded.

125. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 125 and, therefore, the allegations are denied and strict proof is demanded.

126. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

127. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 127 and, therefore, the allegations are denied and strict proof is demanded.

128. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 128 and, therefore, the allegations are denied and strict proof is demanded.

129. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 129 and, therefore, the allegations are denied and strict proof is demanded.

130. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 130 and, therefore, the allegations are denied and strict proof is demanded.

131. To the extent that the allegations in Paragraph 131 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

132. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 132 and, therefore, the allegations are denied and strict proof is demanded.

M.M.A.

133. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 133 and, therefore, the allegations are denied and strict proof is demanded.

134. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 134 and, therefore, the allegations are denied and strict proof is demanded.

135. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

136. To the extent that the allegations in Paragraph 136 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

137. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 137 and, therefore, the allegations are denied and strict proof is demanded.

S.M.F.

138. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 138 and, therefore, the allegations are denied and strict proof is demanded.

139. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 139 and, therefore, the allegations are denied and strict proof is demanded.

140. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

141. To the extent that the allegations in Paragraph 141 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

142. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 142 and, therefore, the allegations are denied and strict proof is demanded.

A.C.J.

143. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 143 and, therefore, the allegations are denied and strict proof is demanded.

144. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 144 and, therefore, the allegations are denied and strict proof is demanded.

145. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

146. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 146 and, therefore, the allegations are denied and strict proof is demanded. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts and strict proof is demanded.

147. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 147 and, therefore, the allegations are denied and strict proof is demanded. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts and strict proof is demanded.

148. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patients and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any

additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

149. To the extent that the allegations in Paragraph 149 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

150. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 150 and, therefore, the allegations are denied and strict proof is demanded.

J.E.H.

151. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 151 and, therefore, the allegations are denied and strict proof is demanded.

152. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 152 and, therefore, the allegations are denied and strict proof is demanded.

153. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any

additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

154. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

155. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 155 and, therefore, the allegations are denied. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts and strict proof is demanded.

156. To the extent that the allegations in Paragraph 156 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

157. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 157 and, therefore, the allegations are denied and strict proof is demanded.

C.V.M.

158. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 158 and, therefore, the allegations are denied and strict proof is demanded.

159. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 159 and, therefore, the allegations are denied and strict proof is demanded.

160. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

161. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

162. To the extent that the allegations in Paragraph 162 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

163. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 163 and, therefore, the allegations are denied and strict proof is demanded.

S.K.P.

164. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 164 and, therefore, the allegations are denied and strict proof is demanded.

165. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 165 and, therefore, the allegations are denied and strict proof is demanded.

166. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 166 and, therefore, the allegations are denied and strict proof is demanded.

167. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 167 and, therefore, the allegations are denied and strict proof is demanded.

168. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 168 and, therefore, the allegations are denied and strict proof is demanded.

169. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 169 and, therefore, the allegations are denied and strict proof is demanded.

170. To the extent that the allegations in Paragraph 170 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

171. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 171 and, therefore, the allegations are denied and strict proof is demanded.

C.L.K.

172. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 172 and, therefore, the allegations are denied and strict proof is demanded

173. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 173 and, therefore, the allegations are denied and strict proof is demanded

174. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

175. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

176. To the extent that the allegations in Paragraph 176 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

177. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 177 and, therefore, the allegations are denied and strict proof is demanded.

H.G.B.

178. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 178 and, therefore, the allegations are denied and strict proof is demanded.

179. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 179 and, therefore, the allegations are denied and strict proof is demanded.

180. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 180 and, therefore, the allegations are denied and strict proof is demanded.

181. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 181 and, therefore, the allegations are denied and strict proof is demanded.

182. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 182 and, therefore, the allegations are denied and strict proof is demanded.

183. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 183 and, therefore, the allegations are denied and strict proof is demanded.

184. The allegations in Paragraph 184 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

185. The allegations in Paragraph 185 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

186. The allegations in Paragraph 186 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

187. To the extent that the allegations in Paragraph 187 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

188. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 188 and, therefore, the allegations are denied and strict proof is demanded.

B.C.P.

189. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 189 and, therefore, the allegations are denied and strict proof is demanded.

190. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 190 and, therefore, the allegations are denied and strict proof is demanded.

191. The allegations in Paragraph 191 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

192. To the extent that the allegations in Paragraph 192 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

193. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 193 and, therefore, the allegations are denied and strict proof is demanded.

K.M.J.

194. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 194 and, therefore, the allegations are denied and strict proof is demanded.

195. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 195 and, therefore, the allegations are denied and strict proof is demanded.

196. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

197. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants further answer that at all relevant times defendant Davidow was never alone with patients when performing exams. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

198. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants further answer that at all relevant times defendant Davidow was never alone with patients when performing exams. The Davidow defendants are without knowledge of the

plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

199. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants further answer that at all relevant times defendant Davidow was never alone with patients when performing exams. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

200. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants further answer that at all relevant times defendant Davidow was never alone with patients when performing exams. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

201. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate

acts on any patient and strict proof is demanded. The Davidow defendants further answer that at all relevant times defendant Davidow was never alone with patients when performing exams. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

202. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants further answer that at all relevant times defendant Davidow was never alone with patients when performing exams. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

203. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants further answer that at all relevant times defendant Davidow was never alone with patients when performing exams. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining

portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

204. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

205. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

206. To the extent that the allegations in Paragraph 206 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

207. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 207 and, therefore, the allegations are denied and strict proof is demanded.

D.T.A.

208. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 208 and, therefore, the allegations are denied and strict proof is demanded.

209. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 209 and, therefore, the allegations are denied and strict proof is demanded.

210. The allegations in Paragraph 210 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, The Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

211. The allegations in Paragraph 211 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, The Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

212. The allegations in Paragraph 212 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, The Davidow defendants are without information sufficient to admit or

deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

213. The allegations in Paragraph 213 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, The Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

214. The allegations in Paragraph 214 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, The Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

215. To the extent that the allegations in Paragraph 215 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

216. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 216 and, therefore, the allegations are denied and strict proof is demanded.

K.A.M.

217. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 217 and, therefore, the allegations are denied and strict proof is demanded.

218. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 218 and, therefore, the allegations are denied and strict proof is demanded.

219. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

220. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 220 and, therefore, the allegations are denied and strict proof is demanded. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded.

221. To the extent that the allegations in Paragraph 221 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or

deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

222. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 222 and, therefore, the allegations are denied and strict proof is demanded.

223. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 223 and, therefore, the allegations are denied and strict proof is demanded. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded.

224. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 224 and, therefore, the allegations are denied and strict proof is demanded.

225. To the extent that the allegations in Paragraph 225 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

A.J.S.

226. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 226 and, therefore, the allegations are denied and strict proof is demanded.

227. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 227 and, therefore, the allegations are denied and strict proof is demanded.

228. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

229. To the extent that the allegations in Paragraph 229 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

230. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 230 and, therefore, the allegations are denied and strict proof is demanded.

J.L.K.

231. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 231 and, therefore, the allegations are denied and strict proof is demanded.

232. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 232 and, therefore, the allegations are denied and strict proof is demanded.

233. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

234. The allegations in Paragraph 234 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

235. The Davidow defendants deny that Defendant Davidow committed any acts of physical abuse, sexual abuse, or any other improper or inappropriate acts on any patient and strict proof is demanded. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

236. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 236 and, therefore, the allegations are denied and strict proof is demanded.

237. To the extent that the allegations in Paragraph 237 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

238. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 238 and, therefore, the allegations are denied and strict proof is demanded.

K.E.H.

239. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 239 and, therefore, the allegations are denied and strict proof is demanded.

240. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 240 and, therefore, the allegations are denied and strict proof is demanded.

241. The allegations in Paragraph 241 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or

deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

242. To the extent that the allegations in Paragraph 242 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

243. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 243 and, therefore, the allegations are denied and strict proof is demanded.

C.T.K.

244. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 244 and, therefore, the allegations are denied and strict proof is demanded.

245. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 245 and, therefore, the allegations are denied and strict proof is demanded.

246. The allegations in Paragraph 246 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

247. The allegations in Paragraph 247 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

248. The allegations in Paragraph 248 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

249. To the extent that the allegations in Paragraph 249 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

250. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 250 and, therefore, the allegations are denied and strict proof is demanded.

J.A.H.

251. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 251 and, therefore, the allegations are denied and strict proof is demanded.

252. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 252 and, therefore, the allegations are denied and strict proof is demanded.

253. The allegations in Paragraph 253 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

254. The allegations in Paragraph 254 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

255. The allegations in Paragraph 255 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

256. The allegations in Paragraph 256 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

257. The allegations in Paragraph 257 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

258. To the extent that the allegations in Paragraph 258 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

259. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 259 and, therefore, the allegations are denied and strict proof is demanded.

M.M.

260. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 260 and, therefore, the allegations are denied and strict proof is demanded.

261. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 261 and, therefore, the allegations are denied and strict proof is demanded.

262. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 262 and, therefore, the allegations are denied and strict proof is demanded.

263. The allegations in Paragraph 263 do not pertain to the Davidow defendants and, therefore, no response is required. To the extent a response is required, the Davidow defendants are without information sufficient to admit or deny the allegations and, therefore, the allegations are denied and strict proof is demanded.

264. To the extent that the allegations in Paragraph 264 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants are without knowledge of the plaintiff who asserts the claim in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, deny any other remaining allegations are denied and strict proof is demanded.

265. The Davidow defendants are without information sufficient to admit or deny the allegations in Paragraph 265 and, therefore, the allegations are denied and strict proof is demanded.

COUNT I

ASSAULT AND BATTERY

266. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 266.

267. The Davidow defendants deny the allegations of Paragraph 267. The Davidow defendants deny that Defendant Davidow committed any acts that constitute assault and/or battery. The Davidow defendants are without knowledge of the plaintiffs who assert the claims in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

268. The Davidow defendants deny the allegations of Paragraph 268. The Davidow defendants deny that Defendant Davidow committed any sexual acts with any patients at Cumberland Hospital at any time. The Davidow defendants further deny that Defendant Davidow committed any act which resulted in harmful or offensive contact with any patients at Cumberland Hospital. The Davidow defendants are without knowledge of the plaintiffs who assert the claims in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

269. The Davidow defendants deny the allegations of Paragraph 269. The Davidow defendants deny that Defendant Davidow committed any act which caused injury to any patient at Cumberland Hospital. The Davidow defendants further deny that Defendant Davidow subjected any patient to offensive and harmful touching, imminent battery, or intentionally invaded anyone's rights to be free from offensive and harmful conduct. The Davidow defendants are without knowledge of the plaintiffs who asserts the claims in this Paragraph and are, therefore, without any

additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

270. The Davidow defendants deny the allegations of Paragraph 270. The Davidow defendants deny that Defendant Davidow assaulted and battered any patient at Cumberland Hospital. The Davidow defendants further deny that Defendant Davidow committed any acts of nonconsensual or unwanted touching against any patient of Cumberland Hospital. The Davidow defendants are without knowledge of the plaintiffs who asserts the claims in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

271. The Davidow defendants deny the allegations of Paragraph 271. The Davidow defendants deny that Defendant Davidow made any unconsented contact with any patient at Cumberland Hospital. The Davidow defendants are without knowledge of the plaintiffs who asserts the claims in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

272. The allegations in Paragraph 272 do not pertain to the Davidow defendants and, therefore, no response is required.

273. The allegations in Paragraph 273 do not pertain to the Davidow defendants and, therefore, no response is required.

274. The Davidow defendants deny the allegations of Paragraph 274. The Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts and therefore, the Davidow Defendant deny that any patient Cumberland Hospital suffered, or will continue to suffer, any pain, injury, or damages, of any type, or any disruption of their activities or daily life. The Davidow defendants are without knowledge of the plaintiffs who assert the claims in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph, and, therefore, any other remaining allegations are denied and strict proof is demanded.

275. The allegations in Paragraph 275 do not pertain to the Davidow defendants and, therefore, no response is required.

COUNT II

NEGLIGENCE, GROSS NEGLIGENCE, AND RECKLESS DISREGARD- BREACH OF COMMON LAW DUTY OF SUPERVISION AND CARE

276. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 276.

277. The allegations in Paragraph 277 do not pertain to the Davidow defendants and, therefore, no response is required.

278. The allegations in Paragraph 278 do not pertain to the Davidow defendants and, therefore, no response is required.

279. The allegations in Paragraph 279 do not pertain to the Davidow defendants and, therefore, no response is required.

280. The allegations in Paragraph 280 do not pertain to the Davidow defendants and, therefore, no response is required.

281. The allegations in Paragraph 281 do not pertain to the Davidow defendants and, therefore, no response is required.

282. The allegations in Paragraph 282 do not pertain to the Davidow defendants and, therefore, no response is required.

283. The allegations in Paragraph 283 do not pertain to the Davidow defendants and, therefore, no response is required.

284. The allegations in Paragraph 284 do not pertain to the Davidow defendants and, therefore, no response is required.

COUNT III

NEGLIGENCE, GROSS NEGLIGENCE, AND RECKLESS DISREGARD- BREACH OF DUTY ARISING FROM SPECIAL RELATIONSHIP

285. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 285.

286. The allegations in Paragraph 286 do not pertain to the Davidow defendants and, therefore, no response is required.

287. The allegations in Paragraph 287 do not pertain to the Davidow defendants and, therefore, no response is required.

288. The allegations in Paragraph 288 do not pertain to the Davidow defendants and, therefore, no response is required.

289. The allegations in Paragraph 289 do not pertain to the Davidow defendants and, therefore, no response is required.

290. The allegations in Paragraph 290 do not pertain to the Davidow defendants and, therefore, no response is required.

291. The allegations in Paragraph 291 do not pertain to the Davidow defendants and, therefore, no response is required.

292. The allegations in Paragraph 292 do not pertain to the Davidow defendants and, therefore, no response is required.

293. The allegations in Paragraph 293 do not pertain to the Davidow defendants and, therefore, no response is required.

294. The allegations in Paragraph 294 do not pertain to the Davidow defendants and, therefore, no response is required.

295. The allegations in Paragraph 295 do not pertain to the Davidow defendants and, therefore, no response is required. However, the Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts and therefore, the Davidow defendants deny that any patient at Cumberland Hospital suffered, or will continue to suffer, any pain, injury, or damages, of any type, or any disruption of their activities or daily life, as a result of any acts on the part of Dr. Davidow.

296. The allegations in Paragraph 296 do not pertain to the Davidow defendants and, therefore, no response is required. However, the Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts and deny that Defendant Davidow was a person likely to harm patients. The Davidow defendants further deny that any patient at Cumberland Hospital suffered, or will continue to

suffer, any pain, injury, or damages, of any type, or any disruption of their activities or daily life, as a result of any acts on the part of Defendant Davidow.

297. The allegations in Paragraph 297 do not pertain to the Davidow defendants and, therefore, no response is required. However, the Davidow defendants deny that any patient at Cumberland Hospital suffered, or will continue to suffer, any harm as a result of any acts on the part of Dr. Davidow.

298. The allegations in Paragraph 298 do not pertain to the Davidow defendants and, therefore, no response is required. However, the Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse.

299. The allegations in Paragraph 299 do not pertain to the Davidow defendants and, therefore, no response is required. However, the Davidow defendants deny that any patient at Cumberland Hospital required protection from Defendant Davidow.

300. The allegations in Paragraph 300 do not pertain to the Davidow defendants and, therefore, no response is required. However, the Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts and, therefore, the Davidow defendants deny that any patient at Cumberland Hospital suffered, or will continue to suffer, any pain, injury, or damages, of any type, or any disruption of their activities or daily life, as a result of any acts on the part of Dr. Davidow.

COUNT IV

NEGLIGENCE, GROSS NEGLIGENCE, AND RECKLESS DISREGARD- BREACH OF
ASSUMED DUTY OF CARE

301. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 301.

302. The allegations in Paragraph 302 do not pertain to the Davidow defendants and, therefore, no response is required.

303. The allegations in Paragraph 303 do not pertain to the Davidow defendants and, therefore, no response is required.

304. The allegations in Paragraph 304 do not pertain to the Davidow defendants and, therefore, no response is required.

COUNT IV

NEGLIGENCE, GROSSLY NEGLIGENT, AND RECKLESS RETENTION

305. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 305.

306. The allegations in Paragraph 306 do not pertain to the Davidow defendants and, therefore, no response is required. The Davidow Defendants deny that Defendant Davidow was a dangerous employee or likely to harm others.

307. The allegations in Paragraph 307 do not pertain to the Davidow defendants and, therefore, no response is required. The Davidow Defendants deny that Defendant Davidow sexually abused any patient and further deny that he sexually abused, or had the propensity to sexually abuse, minors.

308. The allegations in Paragraph 308 do not pertain to the Davidow defendants and, therefore, no response is required. The Davidow Defendants deny that Defendant Davidow posed any harm to any patient or patients. The Davidow Defendants also deny that Defendant Davidow was placed on administrative leave by Defendant Cumberland or Defendant UHS; he voluntarily took leave.

309. The allegations in Paragraph 309 do not pertain to the Davidow defendants and, therefore, no response is required. However, the Davidow defendants deny that Defendant Davidow committed any acts of sexual abuse, sexual penetration, or any other improper or inappropriate acts and, therefore, the Davidow defendants deny that any patient at Cumberland Hospital suffered, or will continue to suffer, any pain, injury, or damages, of any type, or any disruption of their activities or daily life, as a result of any acts on the part of Dr. Davidow.

COUNT VI

FALSE IMPRISONMENT

310. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 310.

311. To the extent that the allegations in Paragraph 311 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

312. To the extent that the allegations in Paragraph 312 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

313. To the extent that the allegations in Paragraph 313 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

314. To the extent that the allegations in Paragraph 314 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

315. To the extent that the allegations in Paragraph 315 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

COUNT VII

VICARIOUS LIABILITY

316. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 316.

317. Defendant Davidow admits that he assumed the role of Medical Director for Cumberland Hospital in 1998 and held such position until 2020. The remaining allegations in Paragraph 317 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

318. Defendant Davidow admits that he assumed the role of Medical Director for Cumberland Hospital in 1998 and held such position until 2020. The remaining allegations in Paragraph 318 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

319. Defendant Davidow admits that he assumed the role of Medical Director for Cumberland Hospital in 1998 and held such position until 2020. The remaining allegations in Paragraph 319 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied. The Davidow defendants deny that Defendant Davidow committed any tortious or negligent conduct.

320. To the extent that the allegations in Paragraph 320 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

321. To the extent that the allegations in Paragraph 321 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required. The Davidow defendants deny that Defendant Davidow committed any breaches of duty.

322. The Davidow defendants deny that Defendant Davidow committed any negligent, grossly negligent, or reckless acts or omissions concerning on involving patients at Cumberland Hospital. As to the allegations directed to the remaining defendants, no response is required.

323. The allegations in Paragraph 323 do not pertain to the Davidow defendants and, therefore, no response is required.

324. The allegations in Paragraph 324 do not pertain to the Davidow defendants and, therefore, no response is required.

325. The allegations in Paragraph 325 do not pertain to the Davidow defendants and, therefore, no response is required.

326. The allegations in Paragraph 326 do not pertain to the Davidow defendants and, therefore, no response is required.

327. The allegations in Paragraph 327 do not pertain to the Davidow defendants and, therefore, no response is required.

328. The allegations in Paragraph 328 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

329. The allegations in Paragraph 329 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

330. The Davidow defendants deny that Defendant Davidow engaged in any acts of misconduct, negligence, gross negligence, or reckless conduct. The remaining allegations in Paragraph 330 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

331. The allegations in Paragraph 331 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

332. The Davidow defendants deny that Defendant Davidow breached any duty to any patient of Cumberland Hospital. The remaining allegations in Paragraph 332 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied. The Davidow defendants are without knowledge of the plaintiffs who assert these claims

and are, therefore, without any additional information that would be required to admit or deny any remaining allegations and, therefore, the allegations are denied.

333. The Davidow defendants deny that Defendant Davidow engaged in any acts of misconduct, negligence, gross negligence, or reckless conduct. The remaining allegations in Paragraph 333 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

334. The Davidow defendants deny that Defendant Davidow engaged in any acts of misconduct, negligence, gross negligence, or reckless conduct. The Davidow defendants further deny that Defendant Davidow caused any patients to suffer or continue to suffer any harm, pain, injury, or damage as a result of such alleged acts. The remaining allegations in Paragraph 334 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

COUNT VIII

VIOLETIONS OF THE VIRGINIA CONSUMER PROTECTION ACT

335. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 335.

336. The allegations in Paragraph 336 do not pertain to the Davidow defendants and, therefore, no response is required.

337. The allegations in Paragraph 337 do not pertain to the Davidow defendants and, therefore, no response is required.

338. The allegations in Paragraph 338 do not pertain to the Davidow defendants and, therefore, no response is required.

339. To the extent that the allegations in Paragraph 339 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

340. To the extent that the allegations in Paragraph 340 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

341. The allegations in Paragraph 341 do not pertain to the Davidow defendants and, therefore, no response is required.

342. The allegations in Paragraph 342 do not pertain to the Davidow defendants and, therefore, no response is required.

343. The allegations in Paragraph 343 do not pertain to the Davidow defendants and, therefore, no response is required.

344. The allegations in Paragraph 344 do not pertain to the Davidow defendants and, therefore, no response is required.

345. To the extent that the allegations in Paragraph 345 are directed to the Davidow defendants, the allegations are denied. As to the allegations directed to the remaining defendants, no response is required.

346. The allegations in Paragraph 346 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

347. The allegations in Paragraph 347 are not factual, but set forth legal conclusions to which no response is required. To the extent a response is deemed necessary, the allegations are denied.

COUNT IX

NEGLIGENCE, GROSS NEGLIGENCE, AND RECKLESS DISREGARD- BREACH OF ASSUMED DUTY OF CARE

348. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 348.

349. The allegations in Paragraph 349 do not pertain to the Davidow defendants and, therefore, no response is required.

350. The allegations in Paragraph 350 do not pertain to the Davidow defendants and, therefore, no response is required.

351. The allegations in Paragraph 351 do not pertain to the Davidow defendants and, therefore, no response is required.

352. The allegations in Paragraph 352 do not pertain to the Davidow defendants and, therefore, no response is required.

353. The allegations in Paragraph 353 do not pertain to the Davidow defendants and, therefore, no response is required.

354. The allegations in Paragraph 354 do not pertain to the Davidow defendants and, therefore, no response is required.

DAMAGES

355. The Davidow defendants adopt and incorporate by reference, as if fully set forth herein, the responses to each of the forgoing paragraphs in response to the allegations in Paragraph 355.

356. To the extent that the allegations in Paragraph 356 are directed to the Davidow defendants, the allegations are denied, including all claims for monetary relief as alleged in subparagraphs A through U. The Davidow defendants are without knowledge of the plaintiffs who assert the claims in this Paragraph and are, therefore, without any additional information that would be required to admit or deny any remaining portions of the allegations in this Paragraph. As to the allegations directed to the remaining defendants, no response is required.

357. The Davidow defendants deny each and every allegation not specifically admitted herein.

358. The Davidow defendants deny any and all allegations of negligence, assault, battery, false imprisonment, sexual or physical abuse, fraud, breach of duty, or breach of contract by either Defendant Davidow or Defendant Davidow, P.C.

AFFIRMATIVE DEFENSES

1. All, or some, of plaintiffs' claims are barred by the applicable statute of limitations.

2. The Davidow defendants aver that this action falls within the Virginia Medical Malpractice Act ("Act") and reserve the right to assert all other defenses, privileges, limitations, and protections available under the Act.

3. All, or some, of plaintiffs' claims are barred as Defendant Davidow's conduct was within the scope of his provision of medical care and such conduct comported with the applicable standard of care.

4. All, or some, of plaintiffs' claims are barred as Defendant Davidow had valid and appropriate consent to conduct medical examinations of his patients.

5. Plaintiffs have failed to allege facts sufficient to impose joint and several liability among all defendants.

6. Any claims involving fraud fail as plaintiffs have failed to plead fraud with the requisite specificity.

7. Defendant Davidow, P.C. avers that it had no control over any acts of Defendant Davidow which fell within the scope of the practice of medicine.

8. The alleged acts of Defendant Davidow which form the basis for Count VII were not within the scope of Defendant Davidow's duties of employment or in the execution of the service for which Defendant Davidow was engaged by Defendant Davidow, P.C.

9. Plaintiffs have not pled an adequate basis for the award of punitive damages alleged in the Complaint.

TRIAL BY JURY IS DEMANDED

DANIEL N. DAVIDOW, M.D.
DANIEL N. DAVIDOW, M.D., P.C.

By: 
Of Counsel

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CERTIFICATE OF SERVICE

This is to certify that a true and accurate copy of the foregoing was sent via standard mail, postage prepaid, this 23rd day of November, 2020, to:

Kevin Biniazan, Esquire (VSB #92109)
Jeffrey A. Breit, Esquire (VSB #18876)
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d/b/a Cumberland Hospital for Children and Adolescents,
Universal Health Services, Inc., (By Special Appearance),
UHS of Delaware, Inc., (By Special Appearance) and
UHS Children Services, Inc. (By Special Appearance).*

Herschel C. Harden, III
6284 St. Johns Wood
Williamsburg, Virginia 23188

A handwritten signature in dark ink, appearing to read "Herschel C. Harden, III", is written over a horizontal line.